ADMIN

MEMO

AGENDA

MINUTES

EXPERT PANEL MEETING
MARCH 12-13, 2026

Cosmetic Ingredient Review

Commitment & Credibility since 1976

MEMORANDUM

To: The Expert Panel for Cosmetic Ingredient Safety Members and Liaisons
From: Bart Heldreth, Ph.D., Executive Director, Cosmetic Ingredient Review
Subject: 175th Meeting of the Panel — Thursday and Friday, March 12th - 13th, 2026
Date: February 17th, 2026

Welcome to the first Panel Meeting of 2026! The agenda and accompanying materials for the 175th Expert Panel Meeting, to be held on March 12th - 13th, 2026, are now available. ***The location is the same as the one in September*** – and it is virtual via MS Teams. ***The meeting will start on both days at 9:30 AM EST***, for the benefit of our colleagues in the west. Invitations (3) to join the meeting will arrive separately in your email inbox. Panel members and liaisons will be registered automatically. However, other interested parties may register to attend in advance of the meeting at the meeting page:

https://www.cir-safety.org/meeting/175th-expert-panel-meeting

The meeting agenda includes the consideration of 10 reports advancing in the review process, including 2 draft final reports, 4 draft tentative reports, and 4 draft reports (two of which are re-opened reviews). Also on the agenda is 1 rereview summary; ***for this summary, the Panel is only being asked for editorial changes, if any.*** There are also 3 administrative items, including a proposal for a Use table SOP, a proposal for conclusions on ingredients used in airbrush devices, and clarification on certain types of genotoxicity studies. Because it has been since September that the Panel has met, changes/comments/data added leading up to the postponed December meeting are highlighted in yellow and changes/comments/data added between then and this mailing are highlighted in blue.

Due to the receipt of a late-breaking final opinion of the EU SCCS (relative to the preparation of these dossiers), the CIR staff need more time to evaluate and incorporate this information into the Prostaglandins dossier. Accordingly, the review of that dossier will be postponed to a future meeting of the Panel, in line with current scheduling demands.

Day 1 will start with presentations, followed by the traditional team breakout sessions. Our first presenter is Dr. Donna MacMillan, Director of Outreach and Capacity Building, ICCS, who will provide us with an overview of the ICCS Skin Sensitization Best Practice Guidance and walk us through a case study thereof. This guidance utilizes the integration of in silico, in chemico, and in vitro methods, including those aligned with OECD Test Guidelines. The full guidance is freely available here:

https://www.iccs-cosmetics.org/education/best-practice-guidance/bpg-skin-sensitization-assessment-using-new-approach-methods

Our second presenter is Dr. George Daston, VMS Research Fellow, P&G, who will provide us with insights on data interpretation relevant to the report on phthalates and endocrine activation.

CIR will also provide a very brief presentation on the year in review.

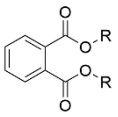
As we continue with our efforts to reduce the quantity of late-breaking information, we are making a

cutoff for most information sent to the Panel. The exception to this cutoff is any pertinent information relevant to a Draft Final Report. (For this meeting, the reports that fall into this category are 2-Bromo-2-Nitropropane-1,3-Diol and Cocoyl Hydrolyzed Collagens.) ***Submissions received on non-final reports, but not in time for inclusion in the Wave 2 supplement on March 2nd, will be held back until the next Panel review of those reports.***

Lastly, CIR is excited to announce our newest Scientific Analyst, Litta Paulson. She has a BS in biology and an MS in public health, both from the Virginia Commonwealth University. Welcome Litta!

Draft Reports - There are 4 draft reports for review. Sufficient data to proceed to a tentative conclusion, or issue an Insufficient Data Announcement (IDA)?

1. Phthalates – DAR (Christina) – ***Dr. Belsito reports on day 2*** – The Panel first published the Final Report of the Safety Assessment of Dibutyl Phthalate, Dimethyl Phthalate, and Diethyl Phthalate in 1985, and concluded that these ingredients are safe for topical application in the present practices of use and concentration in cosmetics. Upon re-review in 2002, the Panel reaffirmed the original conclusion, as published in 2005. In December 2012, the Panel deliberated on studies separately concerning endocrine disruption and diabetes and Dibutyl Phthalate, Diethyl Phthalate, Dimethyl Phthalate, and Butyl Benzyl Phthalate; however, the Panel chose not to re-open the safety assessment of these ingredients and published their discussion as a re-review summary in 2017. The data from the original report and from the re-review evaluated by the Panel prior to publishing the 2005 re-review summary have been summarized in the Draft Amended Report. However, Dibutyl Phthalate was placed on the 2024 Priorities List following nomination by the FDA for cause. As mentioned above, Dr. Daston will provide us with insights on data interpretation relevant to this report and endocrine activation.

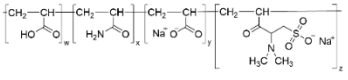


   The frequency of use has been updated in both text and the use table with Registration and Listing Data (RLD) that were received in 2025. Diethyl Phthalate is used in 284 formulations, with most of the uses reported in fragrance preparations. This is an increase from the uses reported in 2024. Additionally, the RLD reported Dibutyl Phthalate is used in 2 “other” preparations (changed from 2 manicuring preparations previously) and Dimethyl Phthalate is used in 2 skin care preparations (no uses were reported in 2024). Voluntary Cosmetic Registration Program (VCRP) survey data received in 2023 reported Diethyl Phthalate was used in 1 skin care formulation; no uses were reported for Dibutyl Phthalate or Dimethyl Phthalate. When comparing the VCRP data received in 2023 to that received in 2001, the frequencies of use for these phthalate ingredients have greatly decreased since the 2005 re-review was published; in 2001, Dibutyl Phthalate was reported to have 150 uses (most in manicuring preparations), Diethyl Phthalate was reported to have 73 uses (most in fragrance preparations), and Dimethyl Phthalate was reported to have 12 uses (most in non-coloring hair preparations).

   The results of the concentration of use survey conducted by the Council in 2025 indicate Diethyl Phthalate has a maximum concentration of use range of 0.1 - 0.15%, with 0.15% reported in leave-on face and neck products. No concentrations of use were reported for Dibutyl Phthalate or Dimethyl Phthalate; however, responses to the survey indicated that Dibutyl Phthalate and Diethyl Phthalate may be present in cosmetics as impurities. In the 2005 re-review, the maximum concentration of use range for Dibutyl Phthalate was 0.0038 - 15% (with 15% reported in manicuring preparations). Diethyl Phthalate was reported to have a maximum concentration of use range of 0.00003 - 11% (11% was reported in perfumes), and Dimethyl Phthalate was reported to have a maximum concentration of use range of 0.00002 - 2% (2% was reported in hair spray).

   If no further data are needed, the Panel should formulate an updated Discussion and issue a Tentative Amended Report. However, if additional data are required, the Panel should be prepared to identify those needs and issue an IDA.

2. Polyacrylate-13 – DR (Temima) – ***Dr. Cohen reports on day 2*** – This is the first time the Panel is seeing this safety assessment. The Scientific Literature Review (SLR) was issued by CIR on September 24, 2025.



Please note, now included in the March Panel version of the report are updated RLD that were received in 2025. The results of the most recent concentration of use survey, which was conducted in 2025 using the Modernization of Cosmetics Regulation Act (MoCRA) product categories, reported the highest reported concentration of use resulting in leave-on exposure was 3.4% in leave-on non-spray face and neck products. Polyacrylate-13 is used in products that are applied near the eye (e.g., eyelash and eyebrow preparations up to 1.8%), that can be incidentally ingested (e.g., lipsticks and lip glosses; concentration of use not reported), and in products that are used near mucous membranes (e.g., bath soaps and body washes; concentration of use not reported). Additionally, Polyacrylate-13 is used in sprays (e.g., perfumes; concentration of use not reported) and powders (e.g., face powders; concentration of use not reported) and could therefore be incidentally inhaled.

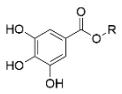
If no further data are needed, the Panel should formulate an updated Discussion and issue a Tentative Report. However, if additional data are required, the Panel should be prepared to identify those needs and issue an IDA.

3. *Salix alba* (Willow) – DR (Priya) – ***Dr. Belsito reports on day 2*** – This is the first time the Panel is reviewing this report on the following 6 ingredients: Salix Alba (Willow) Bark Extract, Salix Alba (Willow) Bark Powder, Salix Alba (Willow) Bark Water, Salix Alba (Willow) Extract, Salix Alba (Willow) Flower Extract, and Salix Alba (Willow) Leaf Extract.

According to RLD frequency of use (FOU) and Council survey concentration of use data received in 2025, Salix Alba (Willow) Bark Extract has the highest frequency and concentration of use. This ingredient is used in 3060 formulations at up to 1.1% (in leave-on face non-spray and neck products). These ingredients may be incidentally ingested as they are used in products used in the mouth (e.g., Salix Alba (Willow) Bark Extract is used in mouthwashes and breath fresheners; concentration not reported). In addition, these ingredients may result in mucous membrane exposure (e.g., Salix Alba (Willow) Bark Extract is used in bath soaps and body washes at 0.004%). These ingredients are reported to be used in baby products (e.g., Salix Alba (Willow) Bark Extract is used in other baby products; concentration not reported). Lastly, these ingredients may be incidentally inhaled as they are used in spray (Salix Alba (Willow) Bark Extract is used in hair spray; concentration not reported) and powder formulations (Salix Alba (Willow) Bark Extract is used in face powders; concentration not reported).

If no further data are needed, the Panel should formulate an updated Discussion and issue a Tentative Report. However, if additional data are required, the Panel should be prepared to identify those needs and issue an IDA.

4. Alkyl Gallates – DAR (Priya) – ***Dr. Cohen reports on day 2*** – This Panel first published a review of the safety of Propyl Gallate in 1985, and concluded that it is safe as a cosmetic ingredient at concentrations not exceeding 1%. In 2007, after the review of new data indicating positive patch test results at 0.5% Propyl Gallate, a Final Amended Report was published on Propyl Gallate with the conclusion that Propyl Gallate is safe in the present practices of use as described in that safety assessment at concentrations less than or equal to 0.1%. The Panel reconsidered the safety of Propyl Gallate in June 2024 and determined to re-open this safety assessment due to new toxicity data and for the inclusion of other in-use alkyl gallates that have not been reviewed by the Panel (Caprylyl Gallate, Dodecyl Gallate, and Ethylhexyl Gallate).

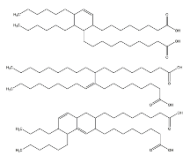


According to 2002 and 2023 VCRP data, Propyl Gallate was used in 164 and 86 formulations, respectively. The maximum reported concentration of use in 2003 for Propyl Gallate was 0.1% in other personal cleanliness products; in 2024, it was reported to be used at up to 0.2% in face and neck products (leave-on, not spray). RLD submitted by the FDA in 2025 indicate Propyl Gallate is used in 1127 total formulations (all other ingredients are reported to be used in 21 formulations or less; no concentrations of use were reported for the other alkyl gallates reviewed in this report).

If no further data are needed, the Panel should formulate an updated Discussion and issue a Tentative Amended Report. However, if additional data are required, the Panel should be prepared to identify those needs and issue an IDA.

Draft Tentative Reports - There are 4 draft tentative reports for consideration. Issue a tentative conclusion?

1. Dimer Dilinoleates – TR (Christina) – ***Dr. Belsito reports on day 2*** – At the June 2025 meeting, the Panel issued an IDA for these 7 ingredients. The additional data needs are:



   - Structures for all ingredients
   - Method of manufacturing for all ingredients
   - Impurities/composition data for all ingredients
   - Repeated oral-dose toxicity data for Dimer Dilinoleyl Dimer Dilinoleate at maximum concentration of use
   - Developmental and reproductive toxicity data
   - Ocular irritation data
   - Dermal irritation and sensitization data at maximum concentration of use for Octyldodecyl/PPG-3 Myristyl Ether Dimer Dilinoleate and Stearyl/PPG-3 Myristyl Ether Dimer Dilinoleate

   Since the IDA, CIR staff have received some of the requested data and more details on some of the data that was already in the report. The following data have been incorporated into the Draft Tentative Report: 1) study submissions of the acute and ocular toxicity data that were received as brief summaries prior to the June 2025 meeting (and a summary thereof), and 2) additional generic method of manufacturing and impurities data.

   The frequency of use has been updated with 2025 RLD in both the text and the use table; of note, Bis-Behenyl/ Isostearyl/Phytosteryl Dimer Dilinoleyl Dimer Dilinoleate went from having no uses in the 2024 RLD to having uses in 2474 formulations. Increases were also observed in several of the other ingredients.

   A draft Abstract and Discussion have been included in this report version. The Panel should carefully consider and discuss the data (or lack thereof), and issue a Tentative Report with a safe, safe with qualifications, insufficient data, unsafe, or split conclusion, and identify any additional items for inclusion in the Discussion.

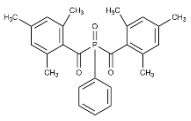
2. Oxyquinoline – TAR (Priya) – ***Dr. Belsito reports on day 2*** – At the December 2024 meeting, the Panel determined to re-open this safety assessment to evaluate new data and to correct the conclusion from the 2006 report. Accordingly, the Draft Amended Report was prepared and evaluated at the June 2025 meeting. At that meeting the Panel issued an IDA for Oxyquinoline and Oxyquinoline Sulfate with the following insufficiencies:

   - Impurities data on Oxyquinoline
   - Phototoxicity data on Oxyquinoline
   - Maximum concentration of use data on Oxyquinoline
   - Dermal absorption data on Oxyquinoline
   - DART data, including an NOAEL on Oxyquinoline (suitable for margin of exposure calculation)
   - Clarification on the type of use around the eyes
     - In 2024, RLD indicated Oxyquinoline Sulfate is used in eyelash and eyebrow preparations (primers, conditioners, serums, fortifiers); the Panel was concerned that these preparations were miscategorized, and may instead be eyelash and eyebrow dyes

   Since the issuing of the IDA, no new data regarding the IDA requests have been received. However, updated concentration of use data have been incorporated into the report. In addition, 2025 RLD have been received and incorporated. Compared to 2024 RLD, the frequency of use for both ingredients reviewed in this report has increased. Use categories between 2024 and 2025 RLD were similar.

   A draft Abstract and Discussion have been included in this report version. The Panel should carefully consider and discuss the data (or lack thereof), and issue a Tentative Amended Report with a safe, safe with qualifications, insufficient data, unsafe, or split conclusion, and identify any additional items for inclusion in the Discussion.

3. Phosphinate Ingredients – TR (Priya) – ***Dr. Cohen reports on day 2*** – At the June 2025 meeting, the Read-Across-Working Group (RAWG) determined that 2 additional ingredients from the 2026 draft priorities list – Bis-Trimethylbenzoyl Phenylphosphine Oxide and Ethyl Trimethylbenzoyl Phenylphosphinate – should be added to this report due to structural similarity to Trimethylbenzoyl Diphenylphosphine Oxide. When the Draft Report that was reviewed at the March 2025 meeting, Trimethylbenzoyl Diphenylphosphine Oxide was the only ingredient included in that assessment. At that meeting, the Panel issued an IDA for the following data:



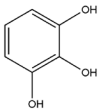
   - Concentration of use in non-nail products
   - Dermal irritation and sensitization data at maximum use concentration for the skin
   - Ocular irritation data (preferably at concentrations for products resulting in eye exposure, once received)
   - Margin of exposure (MOE) calculation
   - Phototoxicity/photosensitization data

   Since the IDA was issued, CIR has not received any of the requested data; however, updated (2025) concentration of use data on Trimethylbenzoyl Diphenylphosphine Oxide have been received. These data state that this ingredient is now used at up to 5% in nail polish and enamel. Because this value aligns with that used in the SCCS MOE calculation on Trimethylbenzoyl Diphenylphosphine Oxide, the same MOE calculation was retained in the report. In addition, an MOE calculation was performed by CIR staff for Ethyl Trimethylbenzoyl Diphenylphosphine Oxide, which is used at concentrations up to 6.2% in nail polish and enamel. In addition, 2025 RLD have been received and incorporated into the report.

   It should be noted that, according to the EU, Trimethylbenzoyl Diphenylphosphine Oxide is classified as a carcinogenic, mutagenic, or toxic for reproduction (CMR) category 1B substance (toxic for reproduction), that is prohibited in cosmetics. Bis-Trimethylbenzoyl Phenylphosphine Oxide and Ethyl Trimethylbenzoyl Phenylphosphinate are not listed as restricted or prohibited under the EU Cosmetics Regulation and are permitted for use, subject to general safety and labeling requirements.

   A draft Abstract and Discussion have been included in this report version. The Panel should carefully consider and discuss the data (or lack thereof), and issue a Tentative Report with a safe, safe with qualifications, insufficient data, unsafe, or split conclusion, and identify any additional items for inclusion in the Discussion.

4. Pyrogallol – TAR (Christina) – ***Dr. Cohen reports on day 2*** – At the June 2025 meeting, the Panel issued a second IDA for this hair dye ingredient. The additional data needs are:



   - Maximum concentration of use
   - Genotoxicity studies, with metabolic activation, that test for damage to DNA adducts
   - Dermal irritation and sensitization at maximum concentration of use for non-hair dye uses
   - Clarification on the type of use around the eyes
   - Ocular irritation data at maximum concentration of use for products used around the eyes

   Since the IDA, CIR has received no unpublished data. An updated literature search identified one additional relevant reference, which has been incorporated into the report. The frequency of use has been updated with 2025 RLD in both the text and the use table of this March 2026 report version; only one additional use was reported in “other” eye makeup preparations.

   A draft Abstract and Discussion have been included in this report version. The Panel should carefully consider and discuss the data (or lack thereof) and be prepared to issue a Tentative Amended Report with a safe, safe with qualifications, insufficient data, unsafe, or split conclusion, and identify any additional items for inclusion in the Discussion.

Draft Final Reports - There are 2 Draft Final Reports for consideration. Review these drafts, especially the rationale provided in the Discussion sections, and issue final reports, as appropriate.

1. 2-Bromo-2-Nitropropane-1,3-Diol – FAR (Monice/Litta) – ***Dr. Cohen reports on day 2*** – At the June 2025 meeting, the Panel issued a Tentative Amended Report with the conclusion that 2-Bromo-2-Nitropropane-1,3-Diol is safe in cosmetics in the present practices of use and concentration described in this safety assessment.

   Although no new unpublished data were received, many published studies (primarily retrospective studies) were added to the Clinical Use section to provide a complete profile of the sensitization rate to 2-Bromo-2-Nitropropane-1,3-Diol throughout the years since the last re-review was issued. Also now included in the March Panel version of the report are updated RLD that were received in 2025. The Panel should carefully review the Abstract, Discussion, and Conclusion, and issue a Final Amended Report.

2. Cocoyl Hydrolyzed Collagen – FAR (Monice/Litta) – ***Dr. Belsito reports on day 2*** – At the June 2025 meeting, the Panel issued a Tentative Amended Report with the conclusion that the 4 cocoyl hydrolyzed collagen ingredients are safe in cosmetics in the present practices of use and concentrations described in this safety assessment. For 2 ingredients, there are currently no concentrations of use reported; therefore, it is noted that the expectation is that if to be in use, they would be used at concentrations comparable to others in this group. Also now included in the March Panel version of the report are updated RLD that were received in 2025.

   An update to the concentration of use survey was received and incorporated. The Panel should carefully review the Abstract, Discussion, and Conclusion, and issue a Final Amended Report.

Administrative Items - there is 1 re-review summary and 2 administrative items.

1. Fossil Waxes – RRsum – (Temima) – ***Dr. Belsito reports on day 2*** – The Panel should carefully consider the rereview summary and finalize it.
2. Non-OECD Genotoxicity Testing – Admin (Jinqiu) – ***Dr. Cohen reports on day 2*** - At recent meetings and in follow-up communications, concerns were raised by the Panel regarding the interpretability and regulatory relevance of certain genotoxicity assays historically included in CIR safety assessments. In light of this, it is recommended that CIR adopt a standard disclaimer for use in reports whenever these assays are mentioned. Should such a disclaimer be stated in the genotoxicity section of CIR reports wherein the endpoint summaries of such studies are included, or dealt with elsewhere in the reports? Additionally, the Panel is requested to discuss whether to adopt a boilerplate disclaimer for the outdated assays, or to develop such a statement as part of an internal SOP. In addition, further consideration should be given to the appropriate role of NAMs in CIR safety evaluations moving forward.
3. Use Tables – Admin (Monice) – ***Dr. Belsito reports on day 2*** – In the past, the Use tables in the CIR reports were based on the categories used in the VCRP. However, with the advent of MoCRA, there have been changes, updates, and additions to the product categories. Accordingly, CIR has updated the Use table template. We are asking for Panel input as to whether the updated table meets the needs of the Panel.
4. Airbrush Conclusion – Admin (Monice) – ***Dr. Cohen reports on day 2*** – Prior to the mandatory reporting of ingredients used in formulations that employ airbrush application, the Panel acknowledged in the Discussion that the data are insufficient to support the safe use of cosmetic ingredients applied via an airbrush delivery system. However, we now have reported uses that employ airbrush devices as indicated in the RLD. ***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 RLD or in response to the Council concentration of use survey.***

Full Panel Meeting

The Panel will consider 2 dossiers to potentially issue as Final Amended Reports, followed by the remaining reports advancing in the process (i.e., the Tentative Reports and Draft Reports). In addition, a consensus should be reached for the re-review summary, use tables, airbrush conclusion, and non-OECD genotoxicity testing.

Please remember, the meeting starts at 9:30 AM EST on day 1 and day 2.

Looking forward to seeing you all ***virtually***!

Agenda
175th Meeting of the Expert Panel for Cosmetic Ingredient Safety
March 12-13, 2026

Virtual via Microsoft Teams

Thursday, March 12, 2026

9:30 AM EST	**WELCOME TO THE 175th EXPERT PANEL TEAM MEETINGS**	**Drs. Bergfeld/Heldreth**
9:35 AM	**PRESENTATION – NAMs For Assessing Skin Sensitization; Best Practices**	**Dr. Donna MacMillan ICCS, Director, Outreach and Capacity Building**
10:35 AM	**PRESENTATION - Phthalates and Endocrine Activation**	**Dr. George Daston P&G, VMS Research Fellow**
11:30 AM	**PRESENTATION – CIR Update**	**Dr. Bart Heldreth**
12 PM – 1 PM	**Lunch break**	
1 PM - 6 PM	**TEAM MEETINGS**	**Drs. Belsito/Cohen**

Dr. Belsito's Team

DAR (CB)	Phthalates
TAR (CB)	Pyrogallol
TR (CB)	Dimer Dilinoleates
TR (PF)	Phosphinates
TAR (PF)	Oxyquinoline
DR (PF)	Willow
DAR (PF)	Alkyl Gallates
FAR (MF|LP)	Cocoyl Hydrolyzed Collagens
FAR (MF|LP)	2-Bromo-2-Nitropropane-1,3-Diol
Admin (MF)	Use Tables
Admin (MF)	Airbrush Conclusion
Admin (JZ)	Genotoxicity assays
DR (TN)	Polyacrylate-13
RRSum (TN)	Fossil Waxes

Dr. Cohen's Team*

DR (TN)	Polyacrylate-13
RRSum (TN)	Fossil Waxes
FAR (MF|LP)	Cocoyl Hydrolyzed Collagens
FAR (MF|LP)	2-Bromo-2-Nitropropane-1,3-Diol
Admin (MF)	Use Tables
Admin (MF)	Airbrush Conclusion
Admin (JZ)	Genotoxicity assays
DAR (CB)	Phthalates
TAR (CB)	Pyrogallol
TR (CB)	Dimer Dilinoleates
TR (PF)	Phosphinates
TAR (PF)	Oxyquinoline
DR (PF)	Willow
DAR (PF)	Alkyl Gallates

The purpose of the Cosmetic Ingredient Review and the Expert Panel for Cosmetic Ingredient Safety is to determine those cosmetic ingredients for which there is a reasonable certainty, in the judgment of competent scientists, that the ingredients are safe under intended conditions of use.

FR: Final Report || FAR: Final Amended Report || TR: Tentative Report || TAR: Tentative Amended Report || DR: Draft Report || DAR: Draft Amended Report || RR: Re-Review || RRsum: Re-Review Summary || Rev: Revised || SM: Strategy Memo || Admin: Administrative item

BH: Bart Heldreth || MF: Monice Fiume || CB: Christina Burnett || PF: Priya Ferguson || TN: Temima Nguyen || LP: Litta Paulson || JZ: Jinqiu Zhu

*Team moves to the breakout room. For the virtual component of this meeting, that is a separate MS Teams meeting room.

Cosmetic Ingredient Review

Friday, March 13, 2026			
9:30 AM EST	**WELCOME TO THE 175th FULL EXPERT PANEL MEETING**		**Dr. Bergfeld**
9:40 AM	Admin **MINUTES OF THE SEPTEMBER 2025 EXPERT PANEL MEETING**		**Dr. Bergfeld**
9:45 AM	**DIRECTOR'S REPORT**		**Dr. Heldreth**
10:00 AM	**FINAL REPORTS, REPORTS ADVANCING TO THE NEXT LEVEL, OTHER ITEMS**		
	Final Reports		
	FAR (MF|LP)	Cocoyl Hydrolyzed Collagens – ***Dr. Belsito reports***	
	FAR (MF|LP)	2-Bromo-2-Nitropropane-1,3-Diol – ***Dr. Cohen reports***	
	Reports Advancing		
	DAR (CB)	Phthalates – ***Dr. Belsito reports***	
	TAR (CB)	Pyrogallol – ***Dr. Cohen reports***	
	TR (CB)	Dimer Dilinoleates – ***Dr. Belsito reports***	
	TR (PF)	Phosphinate Ingredients – ***Dr. Cohen reports***	
	TAR (PF)	Oxyquinoline – ***Dr. Belsito reports***	
	DAR (PF)	Alkyl Gallates – ***Dr. Cohen reports***	
	DR (PF)	*Salix alba* (Willow)-derived ingredients – ***Dr. Belsito reports***	
	DR (TN)	Polyacrylate-13 – ***Dr. Cohen reports***	
	Other Items		
	RRSum (TN)	Fossil & Synthetic Waxes – ***Dr. Belsito reports***	
	Admin (MF)	Airbrush Conclusion - ***Dr. Cohen reports***	
	Admin (MF)	Use Tables – ***Dr. Belsito reports***	
	Admin (JZ)	Genotoxicity assays – ***Dr. Cohen reports***	

ADJOURN – – *The next meeting will be held in-person on Monday and Tuesday,* ***June 15-16, 2026****, at The Darcy Hotel, 1515 Rhode Island Avenue, NW, Washington, DC 20005. Please check the CIR website for details as the meeting approaches.*

On the basis of all data and information submitted, and after following all of the Procedures (https://www.cir-safety.org/supplementaldoc/cir-procedures), the Expert Panel shall determine whether each ingredient, under each relevant condition of use, is safe, safe with qualifications, unsafe, or there are insufficient data or information to make a determination of safety. Upon making such a determination, the Expert Panel shall issue a conclusion and/or announcement.

FR: Final Report || FAR: Final Amended Report || TR: Tentative Report || TAR: Tentative Amended Report || DR: Draft Report || DAR: Draft Amended Report || RR: Re-Review || RRsum: Re-Review Summary || Rev: Revised || SM: Strategy Memo || Admin: Administrative item

BH: Bart Heldreth || MF: Monice Fiume || CB: Christina Burnett || PF: Priya Ferguson || TN: Temima Nguyen || LP: Litta Paulson || JZ: Jinqiu Zhu

ONE HUNDRED SEVENTY-FOURTH MEETING

OF THE

EXPERT PANEL FOR COSMETIC INGREDIENT SAFETY

September 8-9, 2025

Microsoft Teams Virtual Meeting

Expert Panel Members

Wilma F. Bergfeld, M.D., Chairperson

Donald V. Belsito, M.D., Teamleader

David E. Cohen, M.D., Teamleader

Samuel M. Cohen, M.D., Ph.D.

Curtis D. Klaassen, Ph.D.

Allan E. Rettie, Ph.D., RAWG leader

David Ross, Ph.D.

Paul W. Snyder, D.V.M., Ph.D.

Susan Tilton, Ph.D.

Liaison Representatives

Consumer

Courtney Griffin, J.D.

Industry

Kimberly Norman, Ph.D. (Acting)

Government

Prashiela Manga, Ph.D. (Acting)

Jannavi Srinivasan, Ph.D.

Janet Zang, Ph.D.

Hong Xie, Ph.D.

Adopted (Date)

Wilma F. Bergfeld, M.D.

CIR Staff

Administration
Bart Heldreth, PhD - Executive Director

Monice Fiume, MBA - Senior Director

Carla Jackson - Administrative Coordinator

Subject Matter Expertise
Jinqiu Zhu, PhD, DABT, ERT, DCST - Toxicologist

Analysis
Christina L. Burnett, MSES - Senior Scientific Analyst

Priya Ferguson, MS - Senior Scientific Analyst

Temima Nguyen, MS - Scientific Analyst

Information Services
Kevin Stone Fries, MLS - Information Services Manager

Other Virtual Attendees

Name	Organization
Nan An	FDA
Christina Awada	Combe, Inc.
John Bailey	EAS Consulting Group
Jennifer Cazabon	Arxada
Azita Cuevas	Combe, Inc.
Carol Eisenmann	Personal Care Products Council
Matt Georgacakis-Nurre	Stepan Co.
Enrico Gilberti	L'Oreal & CIR SSC
Linda Giles	Transcription Etc.
Dave Gossai	L'Oreal
Kristin Hauge-Nilsen	Evonik
Sandra James-Yi	Nu Skin
Miao Li	FDA
Holly Hannah Maguire	Arxada
Arimatsu Makie	Shiseido
Lauren Nardella	HBW Insight
Jeff Nicoloi	J Nicoloi Law
Allison Schafer	Procter & Gamble
Alexandra Gorman Scranton	Women's Voices for the Earth
Rui Shen	Stepan Co.
Kathy Stanton	Personal Care Products Council
Patra Volarath	FDA
Zemin Wang	FDA
Teresa Washington	FDA
Zhenning Yang	Henkel Corp.
Mimura Yoshikazu	Shiseido

CHAIRPERSON'S OPENING REMARKS

Dr. Bergfeld welcomed the attendees to the 174th meeting of the Expert Panel for Cosmetic Ingredient Safety. Dr. Bergfeld noted that the Read-Across Working Group met on the first day of the meeting to discuss Fatty Acid Amphocarboxylates. The Panel reviewed 13 documents at this meeting and comments from Women's Voice for the Earth.

Dr. Bergfeld thanked the CIR staff, the Council, the CIR Science and Support Committee, and the Panel for all of their efforts in preparing for this meeting.

APPROVAL OF MINUTES

The minutes of the June 9-10, 2025 (173rd) Expert Panel meeting were approved.

DIRECTOR'S REPORT

Dr. Heldreth thanked the members of, and liaisons to, the Panel for their tireless efforts to protect consumers. He also thanked Dr. Enrico Gilberti for stepping up to fill the seat of Chair of the CIR Science and Support Committee after the retirement of Dr. Don Bjerke. Dr. Heldreth announced the retirement of Alex Kowcz as the Vice President of Science at the Council and an open vacancy at CIR for a Scientific Analyst/Writer.

Dr. Heldreth noted that in the upcoming meetings, additional educational presentations on New Approach Methodologies (NAMs) will be offered to the Panel.

FINAL SAFETY ASSESSMENTS

4-Chloro-2-Aminophenol

The Panel issued a Final Amended Report with the conclusion that 4-Chloro-2-Aminophenol is unsafe for use as a cosmetic ingredient. The Panel determined that while absorption data are lacking, it is likely that this aromatic amine will absorb to some extent. Positive genotoxicity results were observed, specifically in Ames tests, and bladder tumors were observed in an oral carcinogenicity study in rats.

4-Nitro-*o*-Phenylenediamine

The Panel issued a Final Amended Report with the conclusion that 4-Nitro-*o*-Phenylenediamine is safe for use as a hair dye ingredient in the present practices of use and concentration described in the safety assessment.

4-Nitro-*o*-Phenylendiamine is reported to function as an oxidative and direct hair dye in hair coloring products. The Panel recognizes that hair dyes containing this ingredient, as coal tar hair dye products, are exempt from certain adulteration and color additive provisions of the Federal FD&C Act when the label bears a caution statement and patch test instructions for determining whether the product causes skin irritation. The Panel expects that following this procedure will identify prospective individuals who would have an irritation/sensitization reaction and allow them to avoid significant exposures.

Basic Blue 7

The Panel issued a Final Report with the conclusion that the available data are insufficient to make a determination of safety for Basic Blue 7 under the intended conditions of use as a hair dye ingredient. In order to come to a conclusion of safety for this hair dye ingredient, the following information is required:

- Chemical properties data
- Method of manufacturing
- Composition/impurities data
- Concentration of use
- Dermal absorption data or 28-d dermal toxicity data o If absorbed, additional data, including developmental and reproductive toxicity data are needed
- Genotoxicity data

The Panel noted that Basic Blue 7 has been reported in non-coloring hair preparations and nail polishes and enamels. However, this ingredient is exempt from certain adulteration and color additive provisions of the FD&C Act only when it is used as a coal tar hair dye ingredient. Accordingly, because Basic Blue 7 is not an approved color additive in cosmetic products, use in non-coloring hair preparations and nail products is not permitted.

Octoxynols

The Panel reviewed the following 25 octoxynol ingredients and issued a Final Report with the conclusion that these ingredients are safe in cosmetics in the present practices of use and concentration described in the safety assessment when formulated to be non-irritating.

Octoxynol-1	Octoxynol-11
Octoxynol-3	Octoxynol-12
Octoxynol-5	Octoxynol-13
Octoxynol-6	Octoxynol-16
Octoxynol-7	Octoxynol-20
Octoxynol-8	Octoxynol-25
Octoxynol-9	Octoxynol-30
Octoxynol-10	Octoxynol-33

Octoxynol-40
Octoxynol-70
Octoxynol-9 Carboxylic Acid
Octoxynol-20 Carboxylic Acid
Potassium Octoxynol-12 Phosphate
Sodium Octoxynol-2 Ethane Sulfonate
Sodium Octoxynol-2 Sulfate
Sodium Octoxynol-6 Sulfate
Sodium Octoxynol-9 Sulfate

The Panel considered comments from Women's Voices of the Earth (WVE) regarding the use of these ingredients in vaginal and baby product formulations; however, such uses are not reported in the Registration and Listing Data (RLD) that were received by CIR from the Food and Drug Administration (FDA) in 2024, and the concentrations of octoxynols in these products are unknown, as such uses were not reported in response to the PCPC concentration of use survey in 2025. Accordingly, uses not reported in the RLD or in response to the concentration of use survey do not fall within the scope of the Panel's conclusion of safety, in that the conclusion is based on the present practices and concentration of use described in the safety assessment.

Baby product use was reported in the 2022 concentration of use survey, with Octoxynol-9 being used at 0.1% in certain baby products; the Panel concluded that, when formulated to be non-irritating, concerns for such are mitigated. The Panel also noted that these ingredients are reported to be used in products that may result in mucous membrane exposure (e.g., disposable wipes). Again, products containing these ingredients should be formulated to be non-irritating to avoid adverse effects.

Finally, the Panel acknowledged that octoxynols can exhibit spermicidal activity. The use of these ingredients as spermicides is considered a non-cosmetic use and is outside the Panel's purview. The Panel does not expect that spermicidal activity would occur with the intended cosmetic use of octoxynols.

***Lactobacillus* Ferment Ingredients**

The Panel reviewed the report on Lactobacillus Ferment, Lactobacillus Ferment Lysate, Lactobacillus Ferment Lysate Filtrate, and Lactobacillus Ferment Filtrate, and issued a Final Report with the conclusion that these ingredients are safe as used in cosmetics, in the present practices of use and concentration, as described in the safety assessment. According to 2023 VCRP data and 2024 RLD, Lactobacillus Ferment is reported to have the highest number of uses among the four ingredients reviewed in this report (266 and 2106 formulations, respectively). Results of a 2025

concentration of use survey conducted by the Council indicate that Lactobacillus Ferment had the highest concentration of use (it is used at up to 5.6% in leave-on products).

***Nelumbo nucifera*-Derived Ingredients**

The Panel issued a Final Report with the conclusion that the following 12 *Nelumbo nucifera* ingredients are safe in cosmetics in the present practices of use and concentration described in this safety assessment:

Nelumbo Nucifera Extract
Nelumbo Nucifera Flower Extract
Nelumbo Nucifera Flower/Leaf/Stem Juice
Nelumbo Nucifera Flower Oil
Nelumbo Nucifera Flower Water
Nelumbo Nucifera Germ Extract
Nelumbo Nucifera Leaf Extract
Nelumbo Nucifera Root Extract
Nelumbo Nucifera Root Water
Nelumbo Nucifera Seed Extract
Nelumbo Nucifera Seed Powder
Nelumbo Nucifera Stamen Extract

The Panel also concluded that the available data are insufficient to make a determination of safety for 2 ingredients, i.e., Nelumbo Nucifera Callus Culture Extract and Nelumbo Nucifera Phytoplacenta Culture Extract, under the intended conditions of use in cosmetic formulations. The Panel stated that to conclude on the safety of these ingredients, the following data are needed:

For Nelumbo Nucifera Callus Culture Extract

- 28-d dermal toxicity data o if positive, additional data may be needed (e.g., development and reproductive toxicity data)
- Ultraviolet (UV) absorption data
    - if absorbed, phototoxicity/photosensitization data

For Nelumbo Nucifera Phytoplacenta Culture Extract

- 28-d dermal toxicity data o if positive, additional data may be needed (e.g., development and reproductive toxicity data)
- UV absorption data o if absorbed, phototoxicity/photosensitization data
- Dermal irritation and sensitization data at maximum concentration of use

Although the tentative conclusion for all 14 ingredients was insufficient data, the Panel determined that the additional data received since the last meeting either answered the data needs for specific ingredients, or, provided information that could be used to evaluate safety of the other non-culture ingredients, due to similarity of composition among plant parts. The Panel considered the food uses of *Nelumbo nucifera* (which would result in much higher exposures than could be expected from cosmetic use) and determined that the historical safety of these uses mitigated the need for systemic toxicity data (including genotoxicity data) for the non-culture ingredients in this report.

TENTATIVE SAFETY ASSESSMENTS

Butoxyethanol

The Panel issued a Tentative Amended Report for public comment with the conclusion that the available data are insufficient to make a determination of safety for Butoxyethanol. The additional data needed to determine the safety of this ingredient are:

- Maximum concentration of use in hair dye formulations
- Maximum concentration of use in non-hair dye formulations

Although effects were observed in 2-yr inhalation studies in mice and rats, the Panel noted that rodents are more susceptible than humans to developing hemangiosarcomas and that tumors in the forestomach, a rodent-specific organ, are typically due to local irritation or high-dose exposure via gavage. Given the species-specific differences in mode-of-action, the Panel concluded that these findings in rodents have limited relevance for human risk assessment.

2-Nitro-*p*-Phenylenediamine

The Panel issued a Tentative Amended Report for public comment with the conclusion that the available data are insufficient to make a determination of safety for 2-Nitro-*p*-Phenylenediamine. The additional data needed to determine the safety of this ingredient are:

- Maximum concentration of use in hair dye formulations
- A 90-d oral repeated dose study with a no-observable-adverse-effect level (NOAEL) that shows a dose-response relationship

The Panel recognizes that coal tar hair dye ingredients are exempt from certain provisions of the FD&C Act when the label bears a caution statement and patch test instructions for determining whether the product causes skin irritation. The Panel expects that following this procedure will identify prospective individuals who would have an irritation/sensitization reaction and allow them to avoid significant exposures. The Panel considered concerns that such self-testing might induce sensitization, but agreed that there was not a sufficient basis for changing this advice to consumers at this time.

Fatty Amphocarboxylates

The Panel reviewed the following 11 fatty amphocarboxylates and issued a Tentative Report for public comment with the conclusion that these ingredients are safe as used in cosmetics when formulated to be nonsensitizing, which may be based on a quantitative risk assessment (QRA) or other appropriate methodology.

Disodium Cocoamphodiacetate
Disodium Cocoamphodipropionate
Disodium Lauroamphodiacetate
Disodium Wheatgermamphodiacetate
Sodium Arganamphoacetate
Sodium Cocoamphoacetate
Sodium Cocoamphopropionate
Sodium Cottonseedamphoacetate
Sodium Lauroamphoacetate
Sodium Olivamphoacetate
Sodium Sweetalmondamphoacetate

The Panel's concern regarding the cardiac findings reported in a developmental and reproductive toxicity (DART) study with Disodium Cocoamphodiacetate was mitigated by the absence of such findings in subsequently submitted DART studies; accordingly, the original observations were considered spurious. The Panel also determined that dermal absorption data were not required for the evaluation of these ingredients, given the absence of systemic toxicity in the endpoints of concern based on the available evidence.

The Panel discussed the potential presence of residual amine impurities, such as amidoamines (amido hydroxyethyl ethylenediamines), to be present in these ingredients. These impurities are of toxicological concern because they may contribute to dermal sensitization. The Panel advises industry to continue minimizing the concentrations of the sensitizing impurities, and utilize a QRA (or other appropriate methodology) to demonstrate that the concentration, product type, and product usage will not result in exposures capable of inducing sensitization. These impurities could also act as precursors for *N*-nitrosamine formation under nitrosating conditions. To mitigate these risks, the Panel emphasized that these ingredients should not be used in cosmetic formulations containing N-nitrosating agents.

Acacia senegal-Derived Ingredients

The Panel issued a Tentative Amended Report for public comment with the conclusion that Acacia Senegal Gum and Acacia Senegal Gum Extract are safe in cosmetics in the present practices of use and concentration as described in the safety assessment. A robust data profile was available for Acacia Senegal Gum. Also, the Panel considered that gum arabic is a direct food substance generally recognized as safe (GRAS), particularly noting the maximum permitted usage level of 85% in soft candy; Acacia Senegal Gum is often referred to as gum arabic in the published literature. Although the profile was not as robust for Acacia Senegal Gum Extract, the Panel stated that the safety of the two ingredients was likely equivalent.

In part, this safety assessment was re-opened to reassess the risks of immunoglobulin E (IgE)-mediated hypersensitivity caused by these ingredients. However, the Panel observed that the reports of IgE responses to these ingredients are rare, and that almost all that do occur are occupational and related to exposure to high concentrations.

Additionally, the Panel noted that aflatoxin has been detected in Acacia senegal; because the Panel believes that aflatoxin should not be present in these ingredients, it has adopted the limits set by the US Department of Agriculture (USDA) corresponding to "negative" aflatoxin content. The Panel also expressed concern about heavy metals, pesticide residues, and other plant species that may be present in botanical ingredients and stressed that the cosmetics industry should continue to minimize impurities in cosmetic formulations according to limits set by the US FDA and the Environmental Protection Agency (EPA).

INSUFFICIENT DATA ANNOUNCEMENTS (IDA)

Alkonium Chlorides and Bromides

The Panel considered the Draft Amended Report on Behenalkonium Chloride, Benzalkonium Bromide, Benzalkonium Chloride, Cetearalkonium Bromide, Lauralkonium Chloride, and Stearalkonium Chloride and issued an IDA. The data needs include the following:

- Impurities data on Behenalkonium Chloride, Benzalkonium Bromide, Cetearalkonium Bromide, and Lauralkonium Chloride
- HRIPT on Benzalkonium Chloride at maximum concentration of use
- Concentration of use of Benzalkonium Chloride and Stearalkonium Chloride in baby products
- Concentration of use of Stearalkonium Chloride in products applied near the eye
- Ocular irritation data on Stearalkonium Chloride at maximum concentration of use

Boric Acid and Sodium Borate

The Panel considered the Draft Amended Report on Boric Acid and Sodium Borate and issued an IDA for these 2 ingredients. The following data are necessary to determine the safety of these ingredients:

- Margin of exposure (MOE) calculations for cosmetic uses that result in mucosal and vaginal exposures.
- Mucosal absorption data
- Vaginal absorption and total application surface area data
- Maximum concentration for Sodium Borate in products applied near the eye area, that result in mucous membrane exposure, and in douches
- Maximum concentration for Boric Acid when used in products applied near the eye

Kojic Acid

The Panel issued a second IDA for Kojic Acid. The additional data needed to determine the safety of this ingredient are:

- Maximum concentration of use for baby products and rinse-off skin care products
- MOE calculations for various exposure scenarios, specifically (e.g., in bath products at 0.05%, rinse-off product, whole-body, face and hands, etc.) and toxicity endpoints (developmental and reproductive toxicity, repeated-dose studies, etc.).

RE-REVIEWS

In accordance with its Procedures, the Panel evaluates the conclusions of previously-issued safety assessments approximately every 15 years. At this meeting, 1 re-review proposal was considered. The Panel elected not to reopen the assessment of 8 Fossil Waxes, and reaffirmed the conclusion reached therein. An expanded re-review summary will be presented to the Panel for review at a future meeting.

OTHER ITEMS & DOCUMENTS

Petition to Amend – Approved - Brown Algae

In September 2019, the Panel issued a final report on 82 brown algae-derived ingredients, with the conclusion that 68 of these ingredients were safe in the present practices of use and concentration. The Panel also concluded that the available data were insufficient to support a conclusion of safety for the remaining 14 ingredients. In 2019, ingredient data profiles were considered sufficient when either composition data, systemic toxicity data (via use in food, GRAS status, or oral toxicity), or sensitization data were available. In December 2024, data (e.g., composition, sensitization) were received on Cladosiphon Novae-Caledoniae Extract (a brown algae-derived ingredient that was previously found insufficient). This submission included a request for the Panel to reconsider the current conclusion on this ingredient. The Panel evaluated the newly received data and determined that the report should be administratively amended to include the new data, and to update the conclusion to state that Cladosiphon Novae-Caledoniae Extract is now considered safe as used in cosmetics.

Hair Dye Epidemiology Resource Document

The Panel reviewed the reformatted draft of the Resource Document prepared for journal submission and discussed the comments received. They emphasized the importance of maintaining the document as a living resource, noting that continued surveillance of emerging scientific evidence necessitates periodical reassessment of its conclusion. The Panel also discussed the potential issue of asymmetric evaluations of scientific evidence in the interpretation of epidemiological data on personal hair dye use and cancer risks. Given the existing methodological uncertainties, they noted the data should be interpreted with appropriate caution, and carefully considered approaches to promote balanced and transparent evaluation, consistent with their broader commitment to methodological robustness and objectivity.

The Panel agreed that the abstract, conclusion, and main body of the Resource Document should be revised to more explicitly capture their perspective on contemporary epidemiological evidence regarding personal (non-occupational) hair dye use and cancer risk. In particular, they highlighted the importance of distinguishing between earlier (pre-1980) and more recent hair dye formulations, as well as further investigating subgroup- and era-specific associations.

The Panel endorsed the inclusion of external scientific input, noting the plan for additional review by an independent epidemiologist to enhance credibility and address potential concerns about evidence interpretation. The Panel agreed that, following additional editorial refinements to meet journal requirements, the Resource Document be submitted to a high-impact peer-reviewed journal.

2026 Final Priorities

There are 16 reports docketed, covering 36 ingredients, on the 2026 Draft Final Priorities List. Three previously proposed ingredient reports (from the 2026 Draft Priorities in March) have been deleted for either inclusion in other reports or lack of relevant cosmetic use; three new ingredient reports are therefore now proposed herein. Additionally, the Hair Color Technical Committee nominated Basic Orange 31 for inclusion as the annual hair ingredient. Reports previously prioritized and on the CIR docket, as well as an extensive number of re-reviews of previous assessments, will supplement the total number of reports/ingredients to be assessed in 2026, and beyond.

Toluene-2,5-Diamine Sulfate is the Allergen of the Year for 2025 from the American Contact Dermatitis Society, and as it is a previously reviewed ingredient now due for rereview, the corresponding report will be docketed for Panel consideration. In the report published in 2010, the Panel concluded that Toluene-2,5-Diamine and Toluene-2,5-Diamine Sulfate are safe as hair dye ingredients in the present practices of use and concentrations but that there are insufficient data to determine the safety of Toluene-3,4-Diamine. Toluene-3,4-Diamine is not currently in use in cosmetic products in the US and has been transmuted to the "insufficient data-zero use" category. Thus, the rereview proposal will only include Toluene-2,5-Diamine and Toluene-2,5-Diamine Sulfate, for the Panel's consideration to reopen or affirm. Other rereviews to potentially be considered for reopening during 2026, based on time passed since last assessment, include:

Aloe-derived ingredients
Butylene Glycol, etc.
Capsaicin, etc.
Dimethicone Copolyol
Ethyl Methacrylate
Glycyrrhetinic Acid, etc.
Maleic Acid
Methacrylic Acid
p-Methylaminophenol
Niacinamide & Niacin
Orya sativa (rice0
PEGs Laurate
Sodium & Ammonium Lauryl Sulfate
Sodium *p*-Chloro-*m*-Cresol
Stearyl Alcohol, etc.
Tosylamide/Formaldehyde Resin
Urea

Interested parties are encouraged to submit pertinent data to the CIR, as soon as possible, for use in the development of the Scientific Literature Reviews (SLR) for these ingredients. Although the specific data needs vary for each safety assessment, the following are typical data that the Panel reviews for each safety assessment.

- Chemistry (including UV absorption), impurities, and method of manufacture
- Concentration of use
- Toxicokinetics data, specifically dermal absorption and/or penetration
- Repeated-dose toxicity data
- Inhalation toxicity data, if the ingredient is used in a product that can be incidentally inhaled
- Reproductive/developmental toxicity data
- Genotoxicity data; if positive, carcinogenicity data may be needed
- Dermal irritation and sensitization data at maximum concentration of use

For the review of botanical ingredients, the additional data needed include: species, plant part, extraction method, solvent, and data on component chemical characterization. It is important that these data are specific for the ingredient(s) as used in cosmetics.

2026 Final Priority List

Ingredient	Frequency of Use (FOU) RLD Year 2024
Per cause	
Basic Orange 31	**552**
Per FOU	
Hydroxycyclohexyl Phenyl Ketone	**2515**
3-*O*-Ethyl Ascorbic Acid	**1947**
Hydrolyzed Quinoa	**1786**
Ethyl Cyanoacrylate	**1659**
Thioglycerin	**1549**
Ceteth-10 Phosphate	**1484**
Hydroxypropyltrimonium Hyaluronate	**1379**
Vaccinium Myrtillus Fruit Extract	**1367**
Diethylhexyl Syringylidenemalonate	**1362**
Etocrylene	**1277**
Dimethyl Isosorbide	**1266**
Polyglyceryl-3 Methylglucose Distearate	**12277**
Chlorella Vulgaris Extract	**1182**
Rosin/Colophonium	**1179**
Asiaticoside	**1122**

RAWG: Fatty Amphocarboxylates – read-across discussion

The Read-Across Working Group (RAWG) convened to discuss newly received data on certain fatty amphocarboxylate ingredients and the utility of various read-across strategies. The RAWG agreed that read-across is complex and decisions related to read-across should be made on a case-by-case basis. They also agreed that read-across should be performed in a compound-specific and endpoint-specific manner. The RAWG, however, proposed for full Panel consideration that in the case of the fatty amphocarboxylates report, the data and accompanying strategies are sufficient to support the assessment.