

ADMIN

Strategy Memo – Re-Reviews with Low  
Frequency of Use (FOU)

EXPERT PANEL MEETING  
September 26-27, 2022



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**Memorandum**

To: Expert Panel for Cosmetic Ingredient Safety Members and Liaisons;  
CIR Science and Support Committee (SSC)  
From: Monice M. Fiume *MMF*  
Senior Director, CIR  
Date: September 1, 2022  
Subject: Re-Reviews with low/no frequency of use

As we have started looking at the large volume of reports that have come due for re-review, it has come to our attention that several of the ingredients that were reviewed 15+ years ago now have no or very low frequency of use (FOU). (Please see page 2 of this memo for a listing of these ingredients.) It should be noted that some of the ingredients named were previously part of a larger family.

According to the [Procedures](#):

*The Expert Panel may, in its discretion or at the request of the Chair of the Steering committee, consider a re-review of any Final Report.*

- (1) Consideration of such a re-review may be based upon new data and information or the passage of substantial time since publication of the Final Report.*
- (2) If the Expert Panel concludes that a re-review is warranted, such re-review shall follow the process established in these procedures for the initial review of the ingredient.*
- (3) If the Expert Panel concludes, after considering any new data and information that have become available since publication of the Final Report, that a re-review is not warranted, the Expert Panel may issue a statement of its reasons for that conclusion in a Re-Review Summary for publication.*
- (4) The Executive Director shall give advance public notice that the Expert Panel is considering the re-review of an ingredient and invite public comment and participation.*

Part (3) states “If the Expert Panel concludes, after considering any new data and information that have become available since publication of the Final Report, that a re-review is not warranted, the Expert Panel may issue a statement of its reasons for that conclusion in a Re-Review Summary for publication.” Lack of use is considered new data. Therefore, accordingly:

**CIR is asking the Panel and the CIR SSC whether, in their opinion, that simply the knowledge of a lack of reported use, or very low use, could be a reason to not re-open the report at this time.** If so, a re-review summary would be developed explicit to that fact. (As a reminder, if any interested party believes a decision is incorrect, they may petition to have that decision amended.)

**Also, if in fact a “low” number of uses is a valid reason to not re-open an assessment, what would that cut-off be?** Please note, in that hair dyes typically have low reported FOU, it should be considered whether they are an exception.

Ingredient(s)	FOU (2022)
<b>NO USES REPORTED</b>	
Glyceryl Monoesters (Glyceryl Collagenate, Glyceryl Isostearates, Glyceryl Sesquioleate; Glyceryl/Sorbitol Oleate/Hydroxystearate; Glyceryl Stearate/Acetate; Glyceryl Stearate/Maleate; Glyceryl Thiopropionate)*	0
Peanut Glycerides*	0
<b>1-10 USES REPORTED</b>	
Benzaldehyde	7
Laneth-10 Acetate & Laneth-9 Acetate*	Laneth-10 Acetate - 1
Maleic Acid	4
Methacrylic Acid	1
Methyl Alcohol	3
MIBK	1
Polyamino Sugar Condensate	1
Potassium Cocoyl Hydrolyzed Collagen & TEA-Cocoyl Hydrolyzed Collagen	Potassium Cocoyl Hydrolyzed Collagen –6 TEA-Cocoyl Hydrolyzed Collagen - 2
Zinc Phenolsulfonate	1
<b>11 -20 USES REPORTED</b>	
Benzethonium Chloride & Methylbenzethonium Chloride	Benzethonium Chloride - 11
Butoxyethanol	11
Ethyl Methacrylate	20
Prunus Amygdalus Dulcis (Sweet Almond) Seed Meal *	14
Toluene	13
Tosylamide/Formaldehyde Resin	19
<b>20 - 30 USES REPORTED</b>	
VA/Crotonates Copolymer	26

\*part of a larger group of ingredients at the time of the original review