
Safety Assessment of Alkanoyl Lactyl Lactate Salts as Used in Cosmetics

Status: Draft Final Report for Panel Review
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The 2019 Cosmetic Ingredient Review Expert Panel members are: Chair, Wilma F. Bergfeld, M.D., F.A.C.P.; Donald V. Belsito, M.D.; Ronald A. Hill, Ph.D.; Curtis D. Klaassen, Ph.D.; Daniel C. Liebler, Ph.D.; James G. Marks, Jr., M.D.; Ronald C. Shank, Ph.D.; Thomas J. Slaga, Ph.D.; and Paul W. Snyder, D.V.M., Ph.D. The CIR Executive Director is Bart Heldreth, Ph.D. This report was prepared by Wilbur Johnson, Jr., M.S., Senior Scientific Analyst.

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Memorandum

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

FROM: Alexandra Kowcz, MS, MBA
Industry Liaison to the CIR Expert Panel

DATE: January 11, 2019

SUBJECT: Tentative Report: Safety Assessment of Alkanoyl Lactyl Lactate Salts as Used in Cosmetics (release date January 4, 2019)

The Council respectfully submits the following comments on the tentative report, Safety Assessment of Alkanoyl Lactyl Lactate Salts as Used in Cosmetics.

Chemistry - The color scheme used in Figures 1 and 2 should be the same. Currently, the oxygen connecting the alkanoyl group to the lactyl lactate is the same color (red) as the lactyl lactate group in Figure 1, but a different color (black) than the alkanoyl group (blue) and the lactyl lactate group (red) in Figure 2.

Cosmetic Use - Since the VCRP and the Council survey are not comprehensive, it would be more appropriate to state that no uses of three ingredients were reported (rather than that the three ingredients "are not being used in cosmetic products in the US").

Summary - Although the USP now publishes the *Food Chemical Codex*, the Summary should indicate that the specifications are from the *Codex* rather than the "United States Pharmacopoeial Convention". If there are USP specifications, they should be added earlier in the report.

Discussion - Please state the range of EC₃ values reported for the LLNAs.

Table 6 - Since the *in vitro* study of Sodium Stearoyl Lactylate (reference 19) predicted that it would be an allergen, perhaps this study should be moved to the sensitization section of this table. Did the authors (reference 19) conclude anything about the irritation potential of Sodium Stearoyl Lactylate?