

---

## Amended Safety Assessment of Benzophenones as Used in Cosmetics

---

Status: Draft Final Amended Report for Panel Review  
Release Date: February 16, 2021  
Panel Date: March 11-12, 2021

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.; Daniel C. Liebler, Ph.D.; Lisa A. Peterson, Ph.D.; Ronald C. Shank, Ph.D.; Thomas J. Slaga, Ph.D.; and Paul W. Snyder, D.V.M., Ph.D. Previous Panel member involved in this assessment: James G. Marks, Jr., M.D. The Cosmetic Ingredient Review (CIR) Executive Director is Bart Heldreth, Ph.D. This report was prepared by Wilbur Johnson, Jr., M.S., Senior Scientific Analyst/Writer, CIR and Jinqiu Zhu, Ph.D., Toxicologist, CIR.



*Commitment & Credibility since 1976*

---

### Memorandum

**To:** Expert Panel for Cosmetic Ingredient Safety Members and Liaisons

**From:** Wilbur Johnson, Jr.  
Senior Scientific Analyst/Writer, CIR

**Date:** February 16, 2021

**Subject:** Amended Safety Assessment of Benzophenones as Used in Cosmetics

Enclosed is the Draft Final Amended Report on Benzophenones as Used in Cosmetics (*benzop032021rep*). At the September 2020 meeting of the Expert Panel for Cosmetic Ingredient Safety (Panel), the Panel issued a Tentative Amended Report with the conclusion that Benzophenone-1, -2, -3, -4, -5, -6, -8, -9, -10, -11, and -12 are safe in cosmetics in the present practices of use and concentration described in this safety assessment. The document has been revised to address comments (*benzop032021pcpc*, enclosed) on the Tentative Amended Report that were received from the Council.

It should be noted that the Panel published a safety assessment of benzophenones with the following conclusion in 1983: On the basis of the available animal data and clinical human experience presented in this report, the Panel concluded that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics. During the same year, the Panel also published an addendum to this published safety assessment, having concluded that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic and that the published conclusion on Benzophenones-1, -3, -4, -5, -9, and -11 is applicable to these 3 ingredients. The published final report and addendum (*benzop03021orig1* and *benzop032021orig2*, respectively) are included for your reference. The Panel elected to defer its next rereview of these ingredients until the National Toxicology Program (NTP) completed an assessment of benzophenone carcinogenicity. An NTP oral carcinogenicity study on Benzophenone-3 was published in May of 2020, and results from this study (included in this safety assessment) were reviewed by the Panel at their September 2020 meeting. The NTP oral carcinogenicity study on Benzophenone-3 reviewed by the Panel involved rats and mice. Results indicated equivocal evidence of carcinogenicity in rats and no evidence of carcinogenicity in mice. Based on these results, the Panel did not express any concern over the carcinogenic potential of benzophenones in cosmetic products. Thus, the Panel's published safety assessment on the benzophenones was reopened at the September meeting, and the Panel determined that the safety of the benzophenones (Benzophenones 1-12) included in the earlier safety assessments combined, except for Benzophenone-7, would be evaluated.

Benzophenones-7, -10, and -12 are included in the original published safety assessment on benzophenones, but that these ingredients are not mentioned in the conclusion of that report. At the September meeting, Benzophenone-7 was excluded from the reopened safety assessment because the Panel noted that it is a chlorinated compound and likely would have a metabolic pathway that is different from the other benzophenones that are being considered. Furthermore, the Panel noted that there is no indication that Benzophenone-7 is being used in cosmetics. The Panel determined that Benzophenones-10 and -12 should be included in the reopened safety assessment. Since the September meeting, a study relating to the tumor promotion potential of Benzophenone-3 was found in the published literature. This study is highlighted in the report text for the Panel's review.

Summary statements relating to 2021 FDA VCRP data (*benzop032021FDA* - enclosed) on benzophenones that were received are also highlighted in the report text. These data are presented in full in Table 3, and substantial changes in ingredient use frequencies are apparent. For example, the use frequency of Benzophenone-2 (299 uses total), which was the highest use frequency reported in the 1983 report, decreased to a value of 55 in 2021. The use frequency of

Benzophenone-4 (240 uses) in the 1983 original report increased substantially to a value of 1226 in 2021. When the 2021 FDA VCRP data are compared with the 2020 data that were reviewed at the September 2020 Panel meeting, decreased use frequencies are apparent. Uses of Benzophenone-2 in 2020 (103 uses) decreased to 55 in 2021, whereas uses of Benzophenone-4 in 2020 (2259 uses) decreased to 1226 in 2021.

Also included in this package for your review are the report history (*benzop032021hist*), flow chart (*benzop032021flow*), literature search strategy (*benzop032021strat*), meeting minutes relating to the original reviews as well as issuance of the Tentative Amended Report (*benzop032021min*), and the ingredient data profile (*benzop032021prof*). This profile identifies information from the original report as well as any new information that was identified since that original report was issued.

After reviewing these documents, as well as the Abstract and Discussion section of the report, the Panel should be prepared to issue a Final Amended Report with the conclusion stated in the first paragraph above.



CIR History of:

**Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12**

**Panel: June of 1981**

The Panel agreed there were sufficient data to make a safety determination on Benzophenones-1, -3, -4, -5, -7, -9, -10, -11, and -12. However, there was discussion of the need for additional mutagenicity testing on Benzophenones-2, -6, and -8.

It was suggested the report be reconsidered by the Panel after the additional testing is done by industry; however, if testing is not done, the report would have to be separated, and Benzophenones-2, -6, and -8 deleted from the recommendation. An insufficient data report would be issued for Benzophenones -2, -6, and -8.

**Tentative Report, Panel: November of 1981**

The following conclusion was unanimously accepted: "On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenone-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics."

Benzophenones-7, -10, and -12 were deleted from the approved safety recommendation and from the title of the report since they are not used in cosmetics. However, data on Benzophenones-7, -10, and -12 were left in the report as useful information because they are chemically similar to the other Benzophenones.

The Panel agreed that, subject to minor revisions, the document will be issued as a Tentative Report for a 90-day comment period.

With regard to Benzophenones-2, -6, and -8, the Panel recommended an Insufficient Data Report. The Panel reviewed the available mutagenesis data on Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12, and found that the available data on Benzophenones-2, -6, and -8 were equivocal. Additional mutagenic testing is required for these three ingredients in a mammalian system, with Benzophenone-1 to be included in the study as a control.

It should be noted that the Panel published a final report on benzophenones with the following conclusion in 1983: On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenones -1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics.

**Final Report Addendum, Panel: December of 1982**

The Expert Panel evaluated the mutagenicity data submitted in response to the Insufficient Data Report of November 25, 1981 on Benzophenones-2, -6, and -8, and found them to be adequate for an assessment of safety. The following conclusion of the report was unanimously approved: "The Panel concludes that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic, and that the conclusion for the Final Report on the Safety Assessment of 1, -3, -4, -5, -9, and -11 which states 'on the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenone-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics' is also applicable to these ingredients."

It should be noted that the Panel published an addendum to the final report (in 1983), having concluded that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic and that the published conclusion on Benzophenones -1, -3, -4, -5, -9, and -11 is applicable to these 3 ingredients.

**Re-review, Teams/Panel: September of 2001**

The Panel determined to not reopen the 1983 published safety assessment until results from National Toxicology Program (NTP) carcinogenicity studies on Benzophenones are available.

### **Draft Amended Report, Teams/Panel: September 14-15, 2020**

The Draft Amended Report also contains use concentration data that were received from the Council and results from the 2020 NTP oral carcinogenicity study on Benzophenone-3.

The Panel published a safety assessment of benzophenones with the following conclusion in 1983: On the basis of the available animal data and clinical human experience presented in this report, the Panel concluded that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics. During the same year, the Panel also published an addendum to this published safety assessment, having concluded that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic and that the published conclusion on Benzophenones-1, -3, -4, -5, -9, and -11 is applicable to these 3 ingredients.

The Panel elected to defer its next rereview of these ingredients until the National Toxicology Program (NTP) completed an assessment of benzophenone carcinogenicity. An NTP oral carcinogenicity study on Benzophenone-3 was published in May 2020, and results from this study have been reviewed by the Panel, along with other safety test data on this ingredient and the other ingredients in this report that have been identified in the published literature since the original safety assessment was published in 1983. The NTP oral carcinogenicity study on Benzophenone-3 reviewed by the Panel involved rats and mice. Results indicated equivocal evidence of carcinogenicity in rats and no evidence of carcinogenicity in mice. Based on these results, the Panel did not express any concern over the carcinogenic potential of benzophenones in cosmetic products. Thus, the Panel's published safety assessment on the benzophenones was reopened at this meeting, and the Panel determined that the safety of the benzophenones (Benzophenones 1-12) included in the earlier safety assessments combined, except for Benzophenone-7, would be evaluated.

It should also be noted that data on Benzophenones-7, -10, and -12 are included in the original published safety assessment on benzophenones, but that these ingredients are not mentioned in the conclusion. At the September meeting, Benzophenone-7 was excluded from the reopened safety assessment because the Panel noted that it is a chlorinated compound and likely would have a metabolic pathway that is different from the other benzophenones that are being considered. Furthermore, the Panel noted that there is no indication that Benzophenone-7 is being used in cosmetics. The Panel determined that Benzophenones-10 and -12 should be included in the reopened safety assessment.

The Panel concluded that the following benzophenone ingredients are safe in cosmetics in the present practices of use and concentration described in this safety assessment, and issued a Tentative Amended Report:

Benzophenone-1	Benzophenone-5	Benzophenone-10*
Benzophenone-2	Benzophenone-6*	Benzophenone-11*
Benzophenone-3	Benzophenone-8*	Benzophenone-12*
Benzophenone-4	Benzophenone-9	

*\* 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 product categories and at concentrations comparable to others in this group*

### **Draft Final Report, Teams/Panel: March 11-12, 2021**

The report has been revised to include comments on the tentative amended report that were received from the Council.

**Benzophenones Data Profile\* - March 11-12, 2021 Panel - Wilbur Johnson, Jr.**

	Use		Method of Mfg	Impurities	Toxicokinetics			Acute Tox			Repeated Dose Tox			DART		Genotox		Carcin		Dermal Irritation			Dermal Sensitization			Phototoxicity		Ocular Irritation		Clinical Studies				
	New Rpt	Old Rpt			log P/log K <sub>ow</sub>	Dermal Penetration	ADME	Dermal	Oral	Inhalation	Dermal	Oral	Inhalation	Dermal	Oral	In Vitro	In Vivo	Dermal	Oral	In Vitro	Animal	Human	In Vitro	Animal	Human	In Vitro	Animal	Retrospective/Multicenter	Case Reports					
Benzophenone-1	168	142		O		X					O	X			X	O	X																	
Benzophenone-2	55	299		O		X	X								X	X	O	X	O					O	X						X			
Benzophenone-3	376	47		O		X	O	X			X	O	X		X	X	O	X	X					O	X	O	X		O	X	X	X		
Benzophenone-4	1226	240		O		X	X					X			X										O	X					X			
Benzophenone-5	10	10																																
Benzophenone-6	0	90				X									O	X	O																	
Benzophenone-7	0	0																																
Benzophenone-8	0	4		O		X									O	X	O															X		
Benzophenone-9	13	123		O																														
Benzophenone-10	0	0																															X	
Benzophenone-11	0	168		O											O																		O	
Benzophenone-12	0	0				O									O	X																	O	X

\* "X" indicates that new data were available in this category for the ingredient; "O" indicates that data from the original assessment were available

**BENZOPHENONES – 03/25/2020;6/17-22/2020; 1/12/2021**

Ingredient	CAS #	InfoBase	SciFinder	PubMed**	TOXNET	FDA	EU	ECHA	IUCLID	SIDS	HPVIS	NICNAS	NTIS	NTP	WHO	FAO	ECE-TOC	Web
Benzophenone-1	131-56-6	Yes		92/19			No	Yes	Yes (REACH dossier)	No	No	No	No	No	No	No	No	
Benzophenone-2	131-55-5	Yes		96/32		Yes	No	No	No	No	No	No	No	No	No	No	No	
Benzophenone-3	131-57-7	Yes		547/120			Yes	Yes	Yes (REACH dossier)	No	No	No	No	Yes	Yes	No	No	
Benzophenone-4	4065-45-6	Yes		124/17			Yes	Yes	Yes (REACH dossier)	No	No	No	No	No	Yes	No	No	
Benzophenone-5	6628-37-1	Yes		35/2			Yes	No	No	No	No	No	No	No	No	No	No	
Benzophenone-6	131-54-4	Yes		6/1			No	Yes	Yes (REACH dossier)	No	No	No	No	No	No	No	No	
Benzophenone-7*	85-19-8	Yes		0			No	No	Yes (REACH dossier)	No	No	No	No	No	No	No	No	
Benzophenone-8	131-53-3	Yes		25/1			No	Yes	Yes (REACH dossier)	No	No	No	No	No	No	No	No	
Benzophenone-9	76656-36-5	Yes		2/1			No	No	No	No	No	No	No	No	No	No	No	
Benzophenone-10*	1641-17-4	Yes		9/6			No	No	No	No	No	No	No	No	No	No	No	
Benzophenone-11	1341-54-4	Yes		0			No	No	No	No	No	No	No	No	No	No	No	
Benzophenone-12*	1843-05-6	Yes		4/1		Yes	No	Yes	Yes (REACH dossier)	No	No	No	No	No	No	No	No	

\*Search all years; remaining ingredient searches (2002 forward)

\*\*PubMed + toxline archive searched

**Search Strategy**

[document search strategy used for SciFinder, PubMed, and Toxnet]

[identify total # of hits /# hits that were useful or examined for usefulness]



## LINKS

InfoBase (self-reminder that this info has been accessed; not a public website) - <http://www.personalcarecouncil.org/science-safety/line-infobase>  
SciFinder (usually a combined search for all ingredients in report; list # of this/# useful) - <https://scifinder.cas.org/scifinder>  
PubMed (usually a combined search for all ingredients in report; list # of this/# useful) - <http://www.ncbi.nlm.nih.gov/pubmed>  
Toxnet databases (usually a combined search for all ingredients in report; list # of this/# useful) - <https://toxnet.nlm.nih.gov/> (includes Toxline; HSDB; ChemIDPlus; DAR; IRIS; CCRIS; CPDB; GENE-TOX)

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

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

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

IUCLID (International Uniform Chemical Information Database) - <https://iuclid6.echa.europa.eu/search>

OECD SIDS documents (Organisation for Economic Co-operation and Development Screening Info Data Sets)- <http://webnet.oecd.org/hpv/ui/Search.aspx>

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

NICNAS (Australian National Industrial Chemical Notification and Assessment Scheme)- <https://www.nicnas.gov.au/>

NTIS (National Technical Information Service) - <http://www.ntis.gov/>

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

WHO (World Health Organization) technical reports - [http://www.who.int/biologicals/technical\\_report\\_series/en/](http://www.who.int/biologicals/technical_report_series/en/)

FAO (Food and Agriculture Organization of the United Nations) - <http://www.fao.org/food/food-safety-quality/scientific-advice/jecfa/jecfa-additives/en/> (FAO);

FEMA (Flavor & Extract Manufacturers Association) - [http://www.femaflavor.org/search/apachesolr\\_search/](http://www.femaflavor.org/search/apachesolr_search/)

Web - perform general search; may find technical data sheets, published reports, etc

ECETOC (European Center for Ecotoxicology and Toxicology Database) - <http://www.ecetoc.org/>

### **JUNE 1981 PANEL MEETING**

#### **Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12**

The Panel agreed there were insufficient data to make a safety determination on Benzophenones-1, -3, -4, -5, -7, -9, -10, -11, and -12. However, there was discussion of the need for additional mutagenicity testing on Benzophenones-2, -6, and -8.

Mr. McNerney agreed to respond to the Team members request for such data as soon as possible.

Dr. Elder suggested the report be reconsidered by the Panel after the additional testing is done by industry; however, if testing is not done, the report would have to be separated, and Benzophenones-2, -6, and -8 deleted from the recommendation. An insufficient data report would be issued for Benzophenones -2, -6, and -8.

### **NOVEMBER 1981 PANEL MEETING**

#### **Benzophenones-1, -3, -4, -5, -9, and -11**

On motion by Dr. Bergfeld, seconded by Dr. Montagna, the following conclusion was unanimously accepted:

“On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenone-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics.”

Benzophenones-7, -10, and -12 were deleted from the approved safety recommendation and from the title of the report since they are not used in cosmetics. However, data on Benzophenones-7, -10, and -12 were left in the report as useful information because they are chemically similar to the other Benzophenones.

Subject to minor revisions, the document will be issued as a Tentative Report for a 90-day comment period.

With regard to Benzophenones-2, -6, and -8, the Panel recommended an Insufficient Data Report. On motion by Dr. Bergfeld, seconded by Dr. Roudabush, the following statement was unanimously approved: “The Panel reviewed the available mutagenesis data on Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12, and found that the available data on Benzophenones-2, -6, and -8 were equivocal. Additional mutagenic testing is required for these three ingredients in a mammalian system, with Benzophenone-1 to be included in the study as a control.”

### **DECEMBER 1982 PANEL MEETING**

#### **Benzophenones-2, -6, and -8**

The Expert Panel evaluated the mutagenicity data submitted in response to the Insufficient Data Report of November 25, 1981 on Benzophenones-2, -6, and -8, and found them to be adequate for an assessment of safety. The following conclusion of the report was unanimously approved: “The Panel concludes that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic, and that the conclusion for the Final Report on the Safety Assessment of 1, -3, -4, -5, -9, and -11 which states 'on the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenone-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics' is also applicable to these ingredients.”

Subject to minor revisions, the document will be issued as an Addendum to the Final Report on Benzophenone-1, -3, -4, -5, -9, and -11, for a 90-day comment period.

### **SEPTEMBER 2002 PANEL MEETING**

#### **Benzophenone and Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12**

The CIR Expert Panel has issued a Final Report on the safety of Benzophenones -1, -3, -4, -5, -9, and -11 in cosmetics, and an addendum to this Final Report to include Benzophenones -2, -6, and -8. The original Final Report Conclusion is stated as follows: On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenones -1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics. Additionally, the following conclusion is stated in the Final Report Addendum: The Panel concludes that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic, and that the conclusion for the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11, which states “On the basis of the available animal and clinical human experience presented in this report, the Panel concludes that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical

application to humans in the present practices of use and concentration in cosmetics” is also applicable to these three ingredients.

Dr. Marks said that his Team determined that the Panel should postpone any decision as to whether or not the Final Safety Assessment on Benzophenones should be reopened until after the NTP carcinogenicity studies have been completed. An NTP 2-year carcinogenicity study on Benzophenone was initiated in 1999, and the pathology quality assessment for this study is ongoing. Benzophenone-3 is listed among the chemicals that NTP has assigned to a laboratory for toxicology/carcinogenesis testing.

Dr. Marks added that during the waiting period for these studies, new photoallergic data should be captured and photosensitivity frequency should be monitored.

Dr. Belsito said that, in light of the ongoing NTP studies, a decision as to whether or not the safety assessment should be reopened cannot be made at this meeting.

Regarding the new data included in the re-review document on Benzophenones, Dr. Belsito said that his Team did not express concern over any of the findings, including the reported incidence of allergic contact dermatitis (low incidence). He then asked whether Dr. Marks’ request that CIR monitor photosensitivity frequency mean that CIR should track every publication that discusses the photosensitization potential and phototoxicity of Benzophenones.

Dr. Marks said that after the NTP carcinogenicity studies have been received and the safety assessment has been formally reopened, the Panel could then revisit the photoallergy data.

Dr. Slaga added that, according to the re-review document, Benzophenone and Benzophenone-3 have weak estrogenic activity, and this is one of the reasons why NTP wanted to test these chemicals.

Dr. McEwen suggested that the Panel not reopen the safety assessment at this meeting, with the proviso that the re-review document will be updated and reviewed again by the Panel after the NTP studies have been made available.

The Panel unanimously agreed that the Panel’s Final Safety Assessment on the Benzophenones should not be reopened until results from the NTP carcinogenicity studies are available.

## **SEPTEMBER 2020 PANEL MEETING – INITIAL REVIEW/DRAFT AMENDED REPORT**

### **Belsito Team – September 14, 2020**

**DR. BELSITO:** Okay. Anything else on acetyl hexapeptide? Okay. So now we move over to benzophenones. Let me make sure I save this correctly. Okay. So this was opened because of time period correct? It's been 15 years and there's tons of new data, particularly about endocrine disruption and effects. But I really didn't think that it changed our conclusion.

However, benzophenone-4, in particular, has significant increase in number of uses. There is a huge amount of data that's new and we have all of these concerns that are floating around the public about endocrine disruption. So I didn't know whether we needed to open this, or since we're, at least from my standpoint, confirming the previous conclusion decide not to open and just publish this as a re-review.

But it's rather lengthy if we include all the new data. And I guess the only other real issue that I had is, as I'm sure you know, a number of states particularly Hawaii have banned benzophenone-3, oxybenzone as being environmentally an issue. And I thought at some point in this document it would be a good idea if we stated that it's the purview of our committee to review human health and not environmental. And we're not ruling on the safety of benzophenone-3 in aquatic environments, particularly coral reefs, which is the concern in Hawaii and several other areas of the world.

**MR. GREMILLION:** Dr. Belsito, can I ask, this is Thomas with CFA.

**DR. BELSITO:** Yeah.

**MR. GREMILLION:** The recent FDA proposed rule, I read that from this report it sounded like it was almost a ban on these chemicals without more data. Is that not right? I know it's a proposed, it's not the rule so it's just a proposal.

**MS. KOWCZ:** This is Alex. This is not a proposed ban on the oxybenzone, Tom. It's, they're looking for additional safety data. But it is not a ban on it. They're re-reviewing all of the sunscreens. The monograph has not been finalized.

**MR. GREMILLION:** But -- well, it's a proposed rule and if the rule's finalized then oxybenzone wouldn't be allowed in sunscreens anymore without --

**MS. KOWCZ:** Due to the OTC reform law it would not -- it's a whole different process now, Tom. It's not a final monograph process anymore.

**MR. GREMILLION:** I realize that there's a congressional intervention that kind of put that proposed rule on ice.

**MS. KOWCZ:** Right.

**MR. GREMILLION:** But this is, you know, you've got our Food and Drug Administration proposing a rule on these chemicals that seem to raise some safety concerns.

**MS. KOWCZ:** They're looking for additional safety data.

**MR. GREMILLION:** Yeah.

**MS. KOWCZ:** That's it. If they're not saying that they're not safe. And, Don, I'm sure that you would probably agree because the AD's been very active in their statements on this.

**DR. BELSITO:** Mm-hmm. Yeah. Well, I mean, I guess the first -- well, I mean, let's go through the data. So there's the tox issue raised by the FDA, which my understanding is basically due to the endocrine -- possible endocrine disruption. Under the absorption, distribution, metabolism, and excretion, Wilbur, the benzophenone-2 I thought that first sentence was sort of awkward.

It says, "The fate of benzophenone-2 was deciphered in eight human and zebrafish in vitro cell models encompassing hepatic mammary cellular context." I didn't understand that. So there were eight human models and eight zebra models, both of which were in vitro and they looked at hepatic and mammary cells. Is that it?

**MR. JOHNSON:** That's my understanding, Dr. Belsito.

**DR. BELSITO:** Okay. So the fate of benzophenone-2 was studied?

**MR. JOHNSON:** Yes. Studied the (inaudible).

**DR. BELSITO:** Yeah. In eight human in vitro cell models and eight zebrafish models or eight models that included zebrafish and humans? I think that needs to be clarified. And I presume --

**MR. JOHNSON:** I need to check that reference, Dr. Belsito and just confirm.

**DR. BELSITO:** And then I assume it's, instead of encompassing the in vitro cell models looking specifically at hepatic and mammary cell, or mammary gland effects or I guess absorption into the liver and mammary glands? I don't --

**DR. LIEBLER:** Perhaps it would be better to simply say, was studied in X human and parenthesis list them, and X zebrafish and parenthesis list them.

**DR. SNYDER:** I think you can just say the fate of benzophenone was studied in human and zebrafish in vitro models. It's one study. It's on reference.

**DR. LIEBLER:** Okay. I like that better.

**DR. SNYDER:** Yeah.

**DR. BELSITO:** So was studied in human and zebrafish in vitro models?

**DR. SNYDER: DR. LIEBLER:** Yes. The way it's written now it seems like it's multiple, it's like eight human models and eight zebrafish models.

**DR. BELSITO:** Right.

**DR. SNYDER:** Yeah. So I think just take, just say it was studied in -- it was evaluated or studied, however, you want to term it -- terminology you want to use, in in vitro cell models and then the summary is fine, I thought.

**DR. BELSITO:** So and then get rid of encompassing hepatic and mammary cell?

**DR. SNYDER:** Yes.

**DR. BELSITO:** Okay. Okay.

**DR. KLAASSEN:** And then right after that reference 32 we should have a capital I. We're starting the next sentence in the human in vitro cell model. Maybe just start with benzophenone-2 wasn't (inaudible). Anyway, we need to have the first word of the sentence capitalized.

**DR. BELSITO:** But that was in the human model. You don't think it's important to say it was human and not zebrafish?

**DR. KLAASSEN:** Okay. Leave it. Just capitalize the "in".

**DR. BELSITO:** Okay. And then on PDF page 22, Wilbur, the second paragraph, I just had a comment on this study. It says that, "The authors concluded that a large amount of benzophenone-3 was absorbed and accumulated in the body of subjects, as

the subjects excreted benzophenone-3 five days after the last application." This is sort of contrary to all the other reports that we've seen about the potential accumulation of benzophenone-3. And I was surprised that it wasn't metabolized to benzophenone-1, which is the usual metabolic route as I understand it. So I was just curious about other people's comments on this study.

**DR. LIEBLER:** Can you indicate specifically the PDF page, Don?

**DR. BELSITO:** Yeah. So it's PDF page --

**DR. LIEBLER:** 22.

**DR. BELSITO:** 22, the second paragraph, the last sentence where the authors conclude a large amount of benzophenone-3 was absorbed and accumulated. I mean, everything else tells us when it gets absorbed it gets metabolized to benzophenone-1, right? It doesn't accumulate.

**MR. GREMILLION:** On page 23 of the PDF it doesn't mention that finding high concentrations of the chemical in adipose tissue and in the brain.

**DR. SNYDER:** Yeah. I didn't have that about the metabolism, Don, to one. I didn't see that. But --

**DR. BELSITO:** Okay.

**DR. LIEBLER:** Without looking at the reference Don's referring to in more detail, it's hard to tell whether or not they actually had the analytical capability to determine whether that the benzophenone-3 that was absorbed was accumulated as benzophenone-3. In other words, what were the analytical methods?

**MR. GREMILLION:** Hi, this is Thomas again. I don't know if you can see me. On page 23 it says, human adipose fats at the top of page 23. Human adipose fat samples were collected from 20 subjects. High concentrations of benzophenone-3 were detected. These results suggest that adipose tissue's -- adipose tissue's an important repository for benzophenone-3 in the human body.

**DR. BELSITO:** Yes. I have that highlighted so I know what you're talking about. It was just my understanding -- I'm trying to look why I have that understanding.

**DR. KLAASSEN:** In regard to Don, the benzophenone-3 being metabolized to benzophenone-1, on page 22, that paragraph that starts with serum samples gives you that impression.

**DR. BELSITO:** Right.

**DR. KLAASSEN:** That after a while you'd see a lot of benzophenone-1 in the serum.

**DR. BELSITO:** Right.

**DR. KLAASSEN:** So that might be where you --

**DR. BELSITO:** Yeah. Yeah. I mean, that's where I was getting it from. So basically what you're saying is that you feel that there's some metabolism to benzophenone-1 but not complete? Is that what you're saying?

**DR. LIEBLER:** I think all it suggests is that benzophenone-1 is a metabolite.

**DR. KLAASSEN:** Yeah.

**DR. BELSITO:** Okay. So then no one has an issue with the accumulation in the body or the fat as a repository. Is that correct?

**DR. LIEBLER:** Right.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** I mean, in this section there are several -- in this ADME section there are several spots where biospecimens were collected from volunteers and analyzed, and benzophenones are measured. But there is apparently no treatment or exposure or application of any substance that is -- that contains a benzophenone where they're trying to look at absorption distribution. So these are more observational studies.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** And I flagged several of those that are different. But I think that for ADME, we probably should not have these observational studies under ADME because they don't really, you know, involve application of benzophenone containing products. Now, maybe we could put these at the end of the ADME section and put a subhead observational studies. But these simply reflect exposures that the individuals that were analyzed, you know, must have had over time but not for a specific experiment.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** Yeah. I'm not proposing getting rid of those, but I just think that we probably shouldn't put them -- mix them together.

**DR. BELSITO:** Okay. So which specific studies are you talking about? What page are you on, Dan?

**DR. LIEBLER:** On PDF 20, Don.

**DR. BELSITO:** Uh-huh.

**DR. LIEBLER:** About a third of the way down where it says human major sub-head and then under it, benzophenone-1, benzophenone-2, benzophenone-3. And then you've got several paragraphs. These are all describing these observational type studies.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** Into PDF 21.

**DR. BELSITO:** So you would like those all move to where?

**DR. LIEBLER:** Maybe at the end of the ADME section and listed as observational studies. Unless we have some other place to put them. But don't you agree that these are not ADME studies?

**DR. BELSITO:** Right.

**DR. KLAASSEN:** I agree. I would prefer a different word than observational studies.

**DR. EISENMANN:** They're often called biomonitoring studies.

**DR. KLAASSEN:** Yes.

**DR. EISENMANN:** I think the data could be nicely put into a table that, you know, had some information about where the population was, at what time, I mean, were the samples taken in the summer, winter, a little bit about when the samples were taken and the concentrations found in what tissue. This is a common material that is in biomonitoring studies.

**DR. LIEBLER:** Right. Right. That's a great suggestion, Carol. I guess what I would do is I'd kick it back to Wilbur and CIR staff to think about how to represent it. If it were possible to represent these simply as references in a table, you know, that would simply be the most minimal way of depicting what is essentially a pretty large literature base. I think it just gets in the way of our report.

**MS. FIUME:** Thanks, Dan. We will definitely look at that and incorporate it into a table versus text. And I'm pretty sure we've had some reports in the past that have had biomonitoring studies included and we can even look at those reports to see where they eventually landed and try and use the same format.

**DR. LIEBLER:** The parabens were very similar.

**MS. FIUME:** Yeah.

**DR. BELSITO:** Okay. And then we have again a risk assessment in the middle of this document.

**DR. SNYDER:** Yeah. It's actually after dermal penetration and before the ADME section so --

**DR. BELSITO:** Right.

**DR. KLAASSEN:** Yeah. Again, if we can move that towards the end as we had suggested earlier.

**DR. BELSITO:** So move after clinical studies before summary?

**DR. KLAASSEN:** Yes.

**MR. JOHNSON:** What is the PDF page, Dr. Belsito?

**DR. BELSITO:** It's PDF 16.

**MR. JOHNSON:** 16. Thank you.

**DR. SNYDER:** So, Don, I think one of the hurdles we have here is we tabled this for NTP study, we got the NTP study but we were also supposed to consider whether we wanted to add 7, 10, and 12.

**DR. BELSITO:** Yeah. I mean, I think we're fine with that.

**DR. LIEBLER:** Yeah.

**DR. SNYDER:** I thought so too.

**DR. LIEBLER:** Yeah.

**DR. SNYDER:** So again, we're going to reopen no matter what because we're going to add three ingredients. And then we can elaborate on all this new data that we've received and all of the issues regarding the endocrine effect and things like that.

**DR. BELSITO:** So, Paul, I have a question. Well, Paul, and Dan, and Curt. So there was this direct association between benzophenone-3 exposure and Hirschsprung's Disease in neonates and then some talk about benzophenone interfering with neural crest migration in the gut. What did you make of that? This is page, PDF 24 just before the tox studies.

**DR. SNYDER:** Yeah. So I looked at that study. It was reference 171 and they -- it was kind of a -- all they did was tested the urine for the presence of benzophenone-3. So, you know, that doesn't, I mean, they made a broad assumption that it was from sunscreen use but yet I didn't see any other data. And then there's lots of data, lots of toxicity data, that doesn't suggest anything to do with any neuro effects or even endocrine for all that matter.

**DR. KLAASSEN:** Yeah. It was a pretty strong statement in the text as I recall. It said that there was a direct association --

**DR. BELSITO:** Yeah.

**DR. KLAASSEN:** And I think that needs to be clarified. I think it needs to be minimized rather than maximized.

**DR. SNYDER:** So probably need to -- we all need to look at the methodology. It was a study out of China so we probably need to send that reference to everybody so we can review the validity of the methodology used.

**DR. BELSITO:** Okay. That study on neural crest migration and Hirschsprung's Disease will need to be looked at further. Okay. And then we have all of these, page 27, we have all of these developmental and reproductive toxicity studies, all these various effects. Do you believe this is all dose-related or how are you interpreting those?

**DR. SNYDER:** I found it very difficult to interpret them. It's all over the place and effects are very non-uniform.

**DR. BELSITO:** Yeah. That's what I mean. So what do we say about these eventually?

**DR. SNYDER:** Well, I think it will be a discussion point about the weight of evidence that there's no uniform hypothesis that these are having an effect, I guess.

**DR. BELSITO:** Okay. So that the results are contradictory or --

**DR. SNYDER:** Yeah. I'm trying to get to the specifics of them. Let's see if I put notes on there.

**DR. KLAASSEN:** Well the -- first of all, part of it has to do with zebrafish and then the rat studies is looking more at the ovaries than a true, I don't know what that means.

**DR. BELSITO:** I mean, the NOAELs for all of these are coming in above 1,000 milligrams per kilogram per day with the exception of one study looking at toxicity in 25 Wistar rats where the NOAEL was 200 milligrams per kilogram per day. But that's still significantly above what you'd expect exposure to be from use of a cosmetic product.

**DR. SNYDER:** Dan, and the benzophenone-3 there was no -- it caused systemic toxicity, but it had no effect of fertility or reproduction so, and there's other studies throughout there that are negative. So I think it's again the preponderance of evidence suggests that there is --

**DR. BELSITO:** So the NOAELs are high compared to cosmetic use and the preponderance of evidence would not support effects on DART parameters?

**DR. SNYDER:** Yeah. But then any of the variable effects were seen at very high doses. And even at that study where the NOAEL was 200, again, it was ossification which can be delayed ossification centers. That can be all kinds of things can cause that that are not related to the test article so even that is pretty weak.

**DR. BELSITO:** Okay. But that would need to go in the discussion.

**DR. SNYDER:** Correct.

**DR. BELSITO:** Okay.

**MR. GREMILLION:** Can I ask -- sorry. Can I ask why the SCCS, the European authorities went with the lower -- if I read this correctly the highest reported use is only like 1.6 percent here and they've capped it over there at 0.5 percent in cosmetics. What was the concern driving that?

**DR. BELSITO:** I don't know. Monice, Wilbur?

**MS. FIUME:** Which PDF page are you on, Tom?

**DR. EISENMANN:** For sunscreen use in Europe it's 6 percent.

**MR. GREMILLION:** I know it's 6 percent but for cosmetic it was -- I think this was in the summary.

**DR. EISENMANN:** Right. For -- to protect the product it's 0.5 percent. Probably because that's what's needed to protect the product.

**MR. GREMILLION:** I guess I don't understand that. What does it mean to protect the product?

**MS. KOWCZ:** Tom, that means when formulating a product you protect the product from discoloration, from turning any color, odor, that kind of thing. That's what they mean by protecting the cosmetic product itself. Just wanted to make sure that that's clear.

**DR. BELSITO:** Yeah. So the other thing, Tom, you have to understand is that in U.S. sunscreens are OTC so they're drugs. In Europe, sunscreens are considered cosmetics, they're not OTC materials. So if they say it can be used up to 6 percent in a sunscreen in terms of European authorities that would actually be a cosmetic.

**MS. KOWCZ:** Right.

**DR. EISENMANN:** Thanks, Don.

**MR. GREMILLION:** Why is there a distinction made between sunscreens and cosmetics? Why don't they just say --

**MS. KOWCZ:** It's the regulatory scheme, Tom, of Europe versus U.S.

**MR. GREMILLION:** Yeah. It also seems strange to me that they would -- a safety commission would promulgate standards on what seems like a quality issue, you know, like the amount of the chemical that effects coloration of the product.

**DR. BELSITO:** Yeah. I quite honestly, Tom, I can't answer that question because it begs the fact that, again, sunscreen's a cosmetic product in Europe and they're allowing that to 6 percent in a cosmetic product for sunscreen. So I can't answer your question why they would mention this 0.5. I wish I had a better answer but, you know, if they're allowing it 6 percent in certain sunscreens they're allowing it at 6 percent in cosmetics. I have a question on PDF 28. The second paragraph just before the animal study.

**DR. KLAASSEN:** What page?

**DR. BELSITO:** PDF 28.

**DR. KLAASSEN:** Okay. Thank you.

**DR. BELSITO:** This make absolutely no sense to me where a low dose had an effect on a decrease in reserve of total oocytes, but the higher dose had an opposite effect.

**DR. SNYDER:** That happened throughout a lot of studies on the tox side too, Don.

**DR. BELSITO:** Yeah.

**DR. SNYDER:** Where the effect was seen at the low dose and there was nothing at the high dose and then, yeah. That's why I say it's very, very -- there's nothing consistent.

**DR. BELSITO:** Yeah.

**DR. SNYDER:** There's no -- many studies there's no dose-response. It only occurred at one dose and it wasn't the high dose. This is very similar to that.

**DR. BELSITO:** Yeah. So then, the next question I had was on PDF page 32, the somewhat second paragraph but full first paragraph under benzophenone-1, -3, -6, and -8. It said, "pseudo positive was defined at the good dose-response with 1.5 to 2 times as many revertant colonies." What does pseudo positive mean? It sounds to me like that's positive.

**DR. KLAASSEN:** Well, I think it means it's kind of weak positive with only having 1.5 to 2 times as many revertant colonies. I would guess that's what they're talking about.

**DR. LIEBLER:** That's what it sounds like.

**DR. BELSITO:** So do we stay with that terminology? I guess that's what the authors used.

**DR. SNYDER:** I'd just strike that sentence because the next two paragraphs explain the study and the results were negative.

**DR. BELSITO:** Okay.

**DR. SNYDER:** I would just strike that sentence.

**DR. LIEBLER:** Yeah.

**DR. BELSITO:** Do you have that Wilbur?

**MR. JOHNSON:** Repeat that on, Dr. Belsito.

**DR. BELSITO:** On PDF page 32, where we're looking at genotox of benzophenone-1, -3, -6, and -8 up to -10 micrograms per (inaudible).

**MR. JOHNSON:** Yes.

**DR. BELSITO:** And it says, "The results indicated positive results for benzophenone-3 and pseudo positive results for benzophenone-1 and -8." Are we striking both of those sentences?



**DR. SNYDER:** I didn't catch the pseudo positive in the next. I was just saying strike the last one because I thought it was related to the methodologies. So I'm confused then, because down below it says in the same study in the genotox of -3 and -8 were negative. So again it says, "Genotox data often times has a sporadic positive," but if the preponderance of the studies are negative, which I think it is in this case --

**DR. BELSITO:** Okay. So then really the last two sentences in that first paragraph should be struck. Where it says, "Results indicate a positive result for benzophenone-3.

**MR. JOHNSON:** Okay. So, delete those last two sentences in the first paragraph?

**DR. BELSITO:** Yeah.

**DR. SNYDER:** I think we need to ask Tom to clarify his interpretation of that section. Because it's just language we've not seen before.

**MR. JOHNSON:** And I might note that there are different doses that were tested in the first paragraph versus the second paragraph.

**DR. BELSITO:** Okay. Well, let's ask Tom.

**DR. KLAASSEN:** When you have a pseudo-positive result it kind of sounds like pseudoscience.

**DR. BELSITO:** Yeah.

**DR. SNYDER:** Sounds like they got the result they were looking for.

**DR. BELSITO:** Okay. On PDF page 34 I have a comment, but my computer is freezing on me. I apologize. But it has something to do with -- okay, I'm just up to 34 now. This is on the carcinogenicity studies. It says,  $10^{-6}$  benzophenone-1 versus  $10^{-9}$  E2?

**DR. SNYDER:** Probably.

**DR. BELSITO:** "The authors stated the results of this study indicate that benzophenone-1 may have the ability to induce ovarian cancer metastasis via regulation of expression of the EMT markers and migration." What did you make of that?

**DR. SNYDER:** Are you just saying the terminology, Don?

**DR. BELSITO:** Well, I mean, the terminology and the fact that the dose of benzophenone-1 was 1,000 higher than the dose of whatever E2 is.

**DR. LIEBLER:** E2 is usually estradiol.

**DR. BELSITO:** Uh-huh.

**DR. LIEBLER:** That's a common abbreviation for estradiol so we should be -- it's, yeah. E2 is mentioned in parenthesis in the first paragraph but never defined. So, Wilbur, I think you should add estradiol if indeed that's what they were using. E2 is an abbreviation for.

**MR. JOHNSON:** Okay. Will do.

**DR. LIEBLER:** And then EMT is another abbreviation. Oh, you've already got that defined, epithelial mesenchymal transition.

**DR. KLAASSEN:** Right.

**DR. LIEBLER:** Yeah.

**DR. SNYDER:** So my suggestion is, since we're going to reopen this, I think it would be very helpful because we have lots of new data, lots of new tox data, lots of new genotox data, lots of new other data, that we have a -- tabulate stuff. Because it's much easier for me to go through and see there's one positive study here but there are 10 that are negative.

And then you can more easily see what doses were tested and what test methodology. And it's much easier to get a feel for the importance of what you're seeing. I think that's a little bit of the problem here is that we've got a lot of new data here, but it's really not tabulated for us to really look at.

**DR. LIEBLER:** Yeah. It's a mountain of data.

**MR. GREMILLION:** I would add one other thing. Looking through the old report there was a reference to carcinogenicity studies at the National Toxicology Program and waiting for the results of that. And there's some FDA's proposed rule. There was quite a bit of discussion of that. But, so maybe, kind of, breaking that out in the report and making clear what the, you know, or highlighting what studies are from that program would be helpful just to sort of link it back up to the previous report.

**DR. BELSITO:** Okay.

**MS. FIUME:** Tom, just to be clear, the NTP studies are new data. That's what they were waiting for. So under the --

**MR. GREMILLION:** Sure.

**MS. FIUME:** -- carcinogenicity study, that was the NTP study that was just published.

**MR. GREMILLION:** Yeah. I don't know if there's an easy way of signaling that more prominently.

**MR. JOHNSON:** Yeah. Because in the oral carcinogenicity data all of those paragraphs relate to that single study.

**DR. SNYDER:** Well, there was two studies, actually. There was a two-year mouse and then a -- I mean, a two-year rat and then a mouse study. So there was actually two studies. There was equivocal in the rat study and there was no evidence in the mouse study. So overall there was no evidence.

**MR. JOHNSON:** And they're both in the same report.

**DR. SNYDER:** Yes. Correct.

**DR. KLAASSEN:** Right.

**DR. SNYDER:** One report, two studies.

**MR. GREMILLION:** I guess, yeah, now that I'm looking at it, I guess it is pretty clear. If there are multiple studies I don't know if there's somewhere you can put, explain that. I just wanted, you know, looking at the old report I wondered how that turned out.

**MS. FIUME:** Yeah. And Tom, we tried to signal that in the introduction as well, in the second paragraph, that the NTP study was published in May of 2020.

**MR. GREMILLION:** Okay.

**MS. FIUME:** Does that help?

**DR. KLAASSEN:** Traditionally, when the NTP does these studies they do it in male rats, female rats, male mice, and female mice. So it's depending on how you look at it there's kind of four different studies within one report.

**MR. GREMILLION:** Okay. I see that now.

**DR. BELSITO:** So just a minor comment, Wilbur, on the tumor promotion on page 36. It says that, "benzophenone-1 may," and then it says, "liked E2." I assume you mean similar to E2 or like E2?

**MR. JOHNSON:** Yeah. It should have been like E2.

**DR. BELSITO:** And, again, this tumor promotion of benzophenone-1 at 200 milligrams per kilogram, I presume that it's not relevant to cosmetic exposure given the dose?

**DR. LIEBLER:** I have a comment on the tumor promotion studies.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** Whenever you're ready.

**DR. BELSITO:** Yeah.

**DR. LIEBLER:** So these are all not tumor promotion studies.

**DR. BELSITO:** Page 36?

**DR. LIEBLER:** Page 36, correct? Under tumor promotion, it starts with benzophenone-1 and there are several paragraphs. Then it goes on to page 37 and then it continues with this other assay. But all of these things under benzophenone-1 are not tumor promotion studies, which is an in vivo phenomenon. These are all in vitro cell models.

Now, my suggestion is that these are not correctly listed as tumor promotion. They, perhaps, should be other relevant studies possibly under carcinogenicity as a sub-head like tumor promotion is. I'd like to hear what Tom thinks, but my understanding is that tumor promotion is truly an in vivo phenomenon. A related comment is on PDF 37 under the sub-head benzophenone-1, benzophenone-3, -6, and -8 they refer to this BHAS promotion assay.

I'm really unfamiliar with this but it looks like it's also an in vitro model. And I'd like to have Tom's comment on that. So I think everything we've got listed under tumor promotion probably isn't really tumor promotion. It should probably be listed somewhere else.

**DR. BELSITO:** Are you talking about that BHAS promotion assay, Dan?

**DR. LIEBLER:** That's correct.

**DR. BELSITO:** So in fact, everything under tumor promotion you'd want Tom's comments?

**DR. LIEBLER:** Yeah. I mean, I think that they're -- I think it's not tumor promotion and if Tom agrees with me then that's what it is. But I think that it's, you know, if Tom disagrees and thinks that the in vitro models belong there then I withdraw my objection. But I'd like to hear what he thinks.

**DR. BELSITO:** Okay.

**DR. LIEBLER:** My hunch is that it doesn't belong and that it just needs to be recategorized. It can still be under the carcinogenesis major heading but as a new subhead, maybe other relevant.

**DR. BELSITO:** Okey-doke.

**DR. KLAASSEN:** I agree.

**DR. BELSITO:** Okay. So on PDF page 40 where the first paragraph under endocrine activation. I just thought we should, this is the third line. It says, "...three potent benzophenones..." I didn't think the word potent belonged there and recommended that it be deleted. Do you see where I am at?

**DR. SNYDER:** Yeah. I agree.

**DR. KLAASSEN:** I agree too.

**DR. LIEBLER:** That's fine.

**DR. BELSITO:** Then on PDF page 42, the last paragraph at the bottom of the page I'm presuming that that's benzophenone-3. But in the first sentence it just says 0.6 to 0.9 percent benzophenone. But it's under the heading of benzophenone-3. I just thought we should be specific.

And then under the -- starting on PDF page, we're at 45, all of those studies were really not truly photosensitization and phototoxicity studies. They were actually all just clinical studies and case reports. So these are patients and they are using thin chambers. They're not volunteers so all of that after just the summary (audio skip) potential from the old report, all of that data under benzophenone-3, benzophenone-2, and -3, benzophenone-2 and -4, those are all clinical studies, benzophenone-10. So all of those should be moved to clinical studies under phototoxicity, photosensitization.

**MR. JOHNSON:** So, Dr. Belsito, you want that moved to the clinical studies section and --

**DR. BELSITO:** Yes.

**MR. JOHNSON:** -- a phototoxicity and photosensitization subheading.

**DR. BELSITO:** Yeah. Exactly.

**MR. JOHNSON:** Okay then.

**DR. BELSITO:** Okay. So at this point, we're reopening to add the new ingredients, and do we have a conclusion at this point? I mean I thought they were safe as used and that our discussion should be the systemic effects were seen at concentrations not relevant to cosmetic exposure. Many of them were somewhat contradictory. There's no sensitization or irritation in photosensitization and phototoxicity. And again, I feel we should say something about environmental that it's not our purview.

**DR. LIEBLER:** I agree with those points. I agree with that conclusion as well.

**MR. JOHNSON:** So the conclusion remains unchanged, Dr. Belsito?

**DR. BELSITO:** Well, other than the fact we're adding in the other ingredients.

**MR. JOHNSON:** Now, I must mention that those three ingredients were included in the original report. Data on those are in the original report but they weren't included in the conclusion.

**DR. BELSITO:** Right. So we're now including them in the conclusion. So it's a different conclusion, we need to reopen it.

**DR. SNYDER:** Yeah. I think this is going to have quite a lengthy discussion. And having the data in a tabulated form will make it easier to draft that, I think.

**DR. LIEBLER:** Yes.

**MS. FIUME:** We will make sure the next version has a lot more tables.

**DR. SNYDER:** Thank you.

**DR. BELSITO:** So the conclusion would be that -1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12 are safe as used, Wilbur.

**MR. JOHNSON:** Okay. Thank you.

**DR. KLAASSEN:** This was an extremely long report. I was glad that I did this first and not last. Otherwise, I probably wouldn't have made it through it. It just went on, and on, and on.

**DR. BELSITO:** What about red algae? We haven't gotten there yet.

**DR. LIEBLER:** Algae was easier.

**DR. SNYDER:** Until I realized there was a part one.

**DR. BELSITO:** Yeah. Any other comments on benzophenones before we move on?

**MR. GREMILLION:** So, I mean, at the risk of being repetitive, I'm looking at the FDA proposed rule and they asked for DART studies on oxybenzone and other data, but the panel's satisfied with the existing data with respect to carcinogenicity risk and absorption, it sounds like.

**DR. LIEBLER:** That's correct.

**MR. GREMILLION:** All right.

### Marks Team – September 14, 2020

**DR. MARKS:** Okay. Next is I have benzophenones, and this actually -- there was a heck of a lot of comments from industry on this. Jay, are you there?

**DR. ANSELL:** Yes.

**DR. MARKS:** Good. Yeah. So I'll just preface it by saying the September 4th memo from Alex had many comments to incorporate into the next draft. And then if my team members want to make any more comments. So let's see here. Wilbur's memo of August 21st, this is an amended safety assessment of the benzophenones. They were first reviewed in '81, and the final report was published in 1983 with a conclusion that 1, 2, 4, 5, 9, and 11 are safe. Then later on that year, 2, 6, and 8 were not mutagenic or genotoxic, and they were added to the list as being safe.

And then we wanted to see -- Tom, correct me if I have interpreted this incorrectly. But after 15 years in the review, the Panel in September 2001 meeting wanted to see what the NTP carcinogenicity studies were, and a rereview summary was published in '85. And now the NTP has released an oral carcinogenicity study on benzophenone-3 earlier this year, so this is basically reopen and add benzophenone-7, 10, and 12.

So the first question would be does it need to be reopened based on this recent NTP oral carcinogenicity study for those ingredients? And if not, then we don't reopen. Do we add 7, 10, and 12 to round it out? Is the adding of those benzophenones, 7, 10, and 12, a no brainer? So any rate, Tom, maybe start with you with the NTP study.

**DR. SLAGA:** Yeah. Sometimes NTP takes a long time to -- because of review process once they finish the studies, and this one went through a lot of reviews, rereviews, comments. So it was a big mess for many, many years.

Just for David, NTP, when they pick out a compound like this to test it, it costs millions and millions of dollars because they use both rats and mice: 50 males, 50 females in both the rats and mice. They do a lot of preliminary short-term mutagenesis, genotoxicity. So they do very, very detailed studies. I'm giving us background.

Anyway, in the rat studies it came out to be equivocal evidence for carcinogenic activity. And that's equivocal -- if you look through this whole bit on carcinogenesis with the rat study, they also do three doses. And one dose is usually fairly high. And they ended up calling it equivocal because there was some early inflammation, hyperplasia in different tissues, and they ended up -- there were a couple benign tumors. And there was no really -- so that's another reason for the equivocal. And also, there were -- in breast cancer, it was actually this compound lead to a much decrease in breast cancer over the controls.

So in the mouse studies, there were no evidence at all. So you put it all together it becomes very questionable if it's carcinogenic. There's nothing in the preliminary, the short term, the genotoxicity, all of that, which support it being any major concern. And it only brings about -- this is oral studies, too. This is giving it orally for two years. I mean, this is giving large doses daily for a long, long time. Anyway, I have no concern with the NTP result affecting its use in cosmetics.

**DR. MARKS:** Okay. Lisa, Tom -- pardon me. Lisa, Ron, do you have any comments?

**DR. SHANK:** Yeah. There's a lot of toxicology data in here, mostly in high doses. I think it has to be reopened, and that has to be discussed. All of these studies -- reproductive toxicity, developmental, genotox, photo-allergenicity, sensitization, but they're at doses or exposures that are not relevant to cosmetic use. So I would definitely reopen, and I would include the new compounds but not benzophenone-7. That's a chlorinated compound, and I think the chlorine atom would change the metabolic pathways that the molecule would follow. But I'd be happy to hear what Dr. Peterson has to say about including benzophenone-7.

**DR. SLAGA:** First of all, I totally agree with Ron. I would reopen it. There is a lot of data. Some of it could be summarized a little better than the way it is. Hello?

**DR. PETERSON:** Yeah. I agree. You know, I hadn't thought about the chlorine. I guess Ron is right, so I could agree with that. It didn't stand out to me. Most of my comments are the presentation of the data and making it easier for people to read it.

**DR. SLAGA:** Yeah.

**DR. BERGFELD:** This is Wilma. I think it's going to be important to do all that's been said but also to be very explicit in the discussion about the NTP study.

**DR. SLAGA:** I agree. It should be discussed in detail. There's a lot of data in the report related to it.

**DR. MARKS:** So Ron Shank?

**DR. SHANK:** Yes, sir.

**DR. MARKS:** The reason you wouldn't include benzophenone-7 is because it's chlorinated, and you're concerned about its toxicity? How about if you got specific endpoints for that? Could it be included?

**DR. SHANK:** I don't have a specific endpoint. I just don't think it's a no brainer.

**DR. MARKS:** Yeah.

**DR. SHANK:** It's unlike all the other benzophenones because it is chlorinated. And my feeling is when you have metabolic data for compounds and then you take another compound and add a chlorine atom to it, that chlorine atom modifies the metabolic pathways that the compound follows. So I think that's a no brainer.

**DR. MARKS:** It's not a no brainer. David, just for your -- we talk about when we reopen and add more compounds there should not be questions of the new compounds. They should be able to piggyback on what we already have from the previous reports. And so what Ron is bringing up is that, because it's chlorinated, it's not a no brainer and we should not include it. Ron --

**DR. PETERSON:** I'm still confused about this no brainer. Could you include it if you discuss the fact that -- I mean, I guess what I was going to look for is what data do we have for the seven congener or the benzophenone-7. And I think it means that you can't just read across basically. But then if you can't read across, does that constitute a whole other document to deal with that one compound? I guess that's my question as a new person.

**DR. ANSELL:** This is Jay. We agree that 7 should not be included for -- Lisa, for those exact reasons. To reopen because of significant additional new data is entirely appropriate. To reopen and then try to include other materials which cannot rely entirely on the dataset, which is already present, would be inappropriate. We would not support. So I think the question is that, with the NTP study, do we reopen? And I guess the sentiment there was clear, but to look at 7, 10, and 12, can they rely entirely on the existing data package? And I think the answer for 7 is clearly no.

**DR. PETERSON:** Okay. I agree.

**DR. ANSELL:** But we would also wonder why 10 and 12 -- that it's not clear that they should be added here.

**MR. JOHNSON:** Dr. Marks, I have a comment, please.

**DR. MARKS:** Yeah. Let's first clarify what Jay said. So Jay, you wouldn't add 10 and 12 either?

**DR. ANSELL:** Yeah. In fact, I wonder whether we should reopen since the NTP data will not change -- well --

**DR. SLAGA:** It wouldn't change the question.

**DR. ANSELL:** -- are there other ways to address the NTP data in a discussion of the reopening decision that we've reviewed that and drawn a conclusion. But if we want to reopen to insert that, then I think the question of 10 and 12 would come up. And I wonder whether they should be added or not.

**DR. PETERSON:** So based on all that -- and I would agree with Ron that 7 should be deleted. But 11 is actually a mixture of 6, 2 and some other substituted materials. And 12 -- I don't know. It seems like you could do -- the metabolism should be different. It should be similar, I should say, to the others.

**DR. BERGFELD:** Did you say similar or dissimilar?

**DR. PETERSON:** I meant similar. Sorry. Misspoke.

**DR. MARKS:** So I think one of the things -- and Wilbur, I'm going to ask you to comment again -- answer your question. But Jay, we have taken ingredients in the past, reopened them, and then once we -- like this, the main thing I heard was to evaluate all these new tox data and studies. We've gotten a lot of them. So by reopening, it allows us to look at that.

We can certainly also consider 10 and 12 as a no brainer. 7 we aren't going to include. And then if with all the new tox data studies and what Tom has already elucidated with the NTP not a concern as far as carcinogenicity, if we decide not to add 10 and 12, we would just then at that point not reopen and do a rereview summary. So I don't think we have to make a final

decision right now in terms of I don't think anybody feels comfortable not reopening it without having reviewed all this new tox data. Is that --

**DR. SLAGA:** I would recommend that we reopen this because there's a lot of tox data, and I would hate to think that someone may think we're trying to hide the NTP study. I think we can, as Wilbur brought up, we can deal with that in the discussion and hopefully eliminate anybody's concerns that there was some small level of positivity related to benign tumors.

**DR. MARKS:** Okay. Wilbur, you had a question.

**MR. JOHNSON:** Yes, Dr. Marks. I just wanted to mention that data on benzophenone-7, 10, and 12 are included in the published safety assessment, but those benzophenones were not captured in the conclusion.

**DR. SHANK:** Could you say that again, please?

**DR. PETERSON:** Yeah.

**MR. JOHNSON:** Yes. I said data on benzophenone-7, 10, and 12 are included in the published safety assessment, but those three benzophenones were not captured in the report conclusion.

**DR. PETERSON:** Oh, so you would propose that they -- because they were in before that we capture them in the conclusion if we reopen?

**DR. BERGFELD:** We usually do it in the abstract.

**DR. SLAGA:** And they were found to be safe.

**DR. SHANK:** 7 was? There are no data on 7.

**MR. JOHNSON:** In the published report?

**DR. BERGFELD:** In the document that we have.

**MR. JOHNSON:** No, not in this one. But in the published safety assessment -- the one that was published in 1983 -- there were data on 7, 10, and 12, but those three were not mentioned in the report conclusion.

**DR. BERGFELD:** Why weren't they brought forward?

**DR. HELDRETH:** So at the time of the 1983 report -- and it seems apparent from the current use data that we have -- benzophenone-7, 10, and 12 don't seem to be used in cosmetics. One of the things we have to remember is a listing of an ingredient name in the cosmetic dictionary doesn't mean that that chemical is actually a cosmetic ingredient. That's just a list of potentially used ingredients.

In fact, I would say the vast majority of chemicals listed in the dictionary aren't actually used. I think there's well over 20,000 ingredients in the cosmetic ingredient dictionary, and according to our VCRP data, we're talking maybe 7,000 ingredients are actually in use. And I think 7, 10, and 12, according to the 1983 report, were not in use then. And according to our current survey data from the council and our VCRP data from FDA, those three ingredients still do not seem to be in use. So it may not be useful to put much time into it, even if it was there before, unless it helps contribute to the safety of the other ingredients that are known to be ingredients.

**DR. SLAGA:** You were a young kid during that time.

**DR. MARKS:** So I don't think there's any question with our team. We want to move to reopen this report, particularly to evaluate the new toxicologic data and studies. And it appears we want to add 10 and 12. We don't want to add benzophenone-7 because it's chlorinated. But Wilbur, if you include data from the original report on 7 that would support its safety, then maybe we would change our mind on that. I'm not sure, Ron, if that qualifies as a no brainer.

**DR. ANSELL:** So let me --

**DR. SHANK:** I don't think benzophenone-7 is a no brainer.

**DR. MARKS:** Okay.

**DR. PETERSON:** But I'm just going to point out it was included before in the earlier report, so...

**DR. MARKS:** I think what we could do is ask Wilbur --

**DR. ANSELL:** Data was but there was no conclusion on 7.

**DR. MARKS:** Right. And we probably didn't review those documents in detail. So Wilbur, maybe in the next rendition of this you will include that in the next rendition. And we may decide -- although it appears we aren't going to include 7, we may decide there's enough data on 7 that we should include it. I don't know. What's your feeling, Ron? Still just delete it? Don't even consider it?

**DR. SHANK:** Well, I guess I'd have to go back to the 1983 report.

**DR. MARKS:** Right. So Wilbur, maybe you can include that in the next rendition of this report. Does that sound reasonable, Bart?

**DR. HELDRETH:** Yeah. That seems reasonable to me. I guess we won't be going forward with making a discussion or a conclusion anyway. So it's okay at this point to just say that it's reopened and that there'll be a draft amended report coming your way.

**DR. MARKS:** Yes.

**DR. ANSELL:** So let me just add that we would be very, very disappointed if anyone comes forward with insufficiencies as it relates to 10 and 12, you know -- to start asking questions about 10 and 12. We do not agree that 7 is supported by all the aggregate of the data on the family. And I also point out that we need to be careful when looking at that to not include its use as a sunscreen active. This should be limited to their use as a cosmetic ingredient, not as a drug active.

**DR. MARKS:** Jay, you don't have to worry. I won't bring it up.

**DR. ANSELL:** Thank you.

**DR. MARKS:** I just want to also -- in the discussion, Wilbur, these are known irritants and sensitizers, so I would use the same wording as in the previous reports. That's on page 81. "The cosmetic concentration is below that of irritation and sensitization -- equal or below that in sunscreens, which is an FDA approved concentration." So I wouldn't ignore the irritation and sensitization. But at the same time, we can use similar wording as before.

So again, move to reopen to evaluate new tox data and studies. We will add 10 and 12 as long as there's a no brainer. Otherwise, Jay will be all over you guys. And we're going to delete benzophenone-7 because it's a chlorinated compound, and we're concerned about its toxicity. And it wouldn't be a no brainer. Sound good?

**DR. PETERSON:** Good.

**DR. SHANK:** Yes.

**DR. MARKS:** Everybody's good with that? Okay. I knew this one was not going to be straightforward. And Tom, thanks for your -- Wilbur, you'll need to capture what Tom's --

**DR. SLAGA:** Well, I should bring up that I was one of the review process. Does that disqualify me?

**DR. BERGFELD:** Yeah.

**DR. MARKS:** No, that's an interesting conflict of interest.

**DR. SLAGA:** Yeah. But that's been so many years ago that I helped review it.

**DR. MARKS:** You know, it's interesting, Tom, because that comes up shortly with methylisothiazolinone with me. And then there was another compound, and Bart suggested you could participate in the discussion. But you can't participate in the vote. So I don't know if you were part of the initial evaluation. Bart and Wilma, what do we think?

**DR. SLAGA:** There was several evaluations over the years, and I was on one of them. It didn't change after we reviewed it.

**DR. HELDRETH:** Yeah. I mean, if there's --

**DR. SLAGA:** It's been more than seven years.

**DR. HELDRETH:** If there's any concern that there may even be the -- although erroneous -- but the appearance of some sort of conflict and you feel like you want to recuse yourself from the vote --

**DR. SLAGA:** Yeah.

**DR. HELDRETH:** -- that's completely fine. But there's no reason you can't participate in the discussion and lend your expertise.

**DR. SLAGA:** I will do that. I'll excuse myself on the vote.

**DR. HELDRETH:** Okay.

**DR. SHANK:** I agree entirely with Tom's analysis of that NPT study. It's right on.

#### Full Panel – September 15, 2020

**DR. MARKS:** In 1983, Benzophenones-1, 2, 3, 4, 5, 6, 8, 9 and 11 were found to be safe. And then, for Benzophenones-7, 10 and 12 there was a wait for NTP studies. And, so, we're waiting a few decades and this year we got an NTP carcinogenicity

study. And, these ingredients were brought to the floor again. And, our team moves to reopen this assessment, this report, and evaluate the new toxicology data and studies, and to add Benzophenones-10 and 12 as no-brainers.

We did not want to add Benzophenones-7, because it's chlorinated and we felt that ruling on the safety of that would not be a no-brainer.

**DR. BERGFELD:** Dr. Belsito, comment?

**DR. BELSITO:** We did not exclude that, so I will pass that issue on to Dan.

**DR. LIEBLER:** I didn't really think that that was a big deal, but I'd need to go look at Table 1, I guess. I'm scrolling madly as I fill here.

**DR. MARKS:** Ron Shank, do you want to make any comments?

**DR. LIEBLER:** Is this from Ron, or Lisa or both?

**DR. BERGFELD:** It's Lisa.

**DR. LIEBLER:** Okay.

**DR. PETERSON:** No, no, no, it was Ron. Ron raised the issue. Ron is muted.

**DR. LIEBLER:** I'm sorry this is such a long report. I'm scrolling as fast as I can.

**DR. BERGFELD:** It's okay.

**DR. MARKS:** Dan, it was because of the chlorination of that compound. Lisa, you can comment for Ron if you want. But that's what Ron's concern is there may be toxicity from the chlorinated compound.

**DR. LIEBLER:** Benzophenones-7?

**DR. PETERSON:** I think he felt that the metabolism would be shifted because of the chlorination. So that you couldn't do necessarily read-across to the other ones because the metabolism might be so different that it would have an impact.

**DR. LIEBLER:** I see.

**DR. PETERSON:** Did I phrase that right, Ron?

**DR. SLAGA:** My recollection is that's correct.

**DR. ANSELL:** Yeah. And, that's supported by...

**DR. MARKS:** Ron, we can't hear you. You can give a thumbs-up if you agree with what Lisa's summary was. Yep, good.

**DR. LIEBLER:** By the way this is really delicious that Ron can't talk. I'm enjoying this so much. And in the spirit of that, I have no objection to excluding it.

**DR. MARKS:** Okay, so, again to repeat the motion, reopen to evaluate the -- we didn't want to just go right on to a final conclusion. We wanted to evaluate all the new toxicological data and studies, which were presented, and again adding Benzophenones-10 and 12.

**DR. BERGFELD:** Don, are you seconding this?

**DR. BELSITO:** Well, we actually thought that all of the tox data, in terms of the systemic effects, were seen at concentrations that were not relevant to cosmetic exposures. And, we were of the opinion that we could go with a safe as used conclusion. So, I guess if we were to exclude Benzophenones-7 that would still have been my panel's conclusion of safe as used. I mean, what do you need to re-evaluate? I mean, we got all the tox data in this draft.

**DR. SLAGA:** This is Tom; I'd like to make a comment. NTP studies to me in rats it was equivocal evidence and in mice it was no evidence. And in rats the equivocal was related to a benign thyroid tumor, which was at a low level. And there were a couple of malignant tumors in a male, which was a malignant meningiomas, but there was no dose response. So, taken all together, I don't have any concern with the NTP. So I kind of agree we could probably go ahead with safe.

**DR. BERGFELD:** Well, is this a case, Bart, of reopening, or not? You heard the comments?

**DR. HELDRETH:** I believe that you're already in a situation where you've reopened it to assess this new data. And, it sounds like there's an agreement that we can continue forward with this. And this additional data, and the discussion that the Panel has provided at this meeting, would be incorporated into the next version of this document, which, if we're going safe, the next time you would see this would be a draft tentative report.

**DR. BERGFELD:** Well, I have a motion from Jim; will you restate your motion? And, then another comment by Don that's a little bit different.



**DR. MARKS:** Well, I'll change my motion, because we will have another look at this. And, we just wanted to have some more time to evaluate the new tox data. But based on what Don has said, and their team, I think we can move forward with it. It seems to me it would be moving forward with a tentative report, safe conclusion, adding Benzophenones-10 and 12. And then, once we've looked at that report, it'll move on final after that. Is that correct, Bart?

**DR. HELDRETH:** Yes, that's correct. Now, I do want to note that the conclusion that you had previously in the original report is rather different than the types of conclusions we have now. I just wanted to point out that it's not likely a reaffirmation of the original conclusion, because it has some language such as "safe for topical application to humans" in the conclusion. So, I just wanted to point that out that it sounds like the conclusion would be modulated to the new safe as used in present practices and concentrations.

**DR. BELSITO:** Yes. I just have one question, Bart. What are we going to do with Benzophenone-7, are we throwing it out; are we saying it's insufficient? What are we going to do here?

**DR. HELDRETH:** I think it's appropriate that the Panel can do either one. Benzophenone-7 has not been reviewed before, so it's not like we're discounting something that we made a conclusion on before. Additionally, both in the data that we received back in 1983, and the data that we have now, it doesn't seem that this ingredient has been used or is in use as a cosmetic ingredient. So, I don't think we're missing anything if we simply exclude it.

**DR. BERGFELD:** Is that agreeable, Don?

**DR. BELSITO:** I mean, it's fine, I just want to know how this works since we started the process with Benzophenone-7 in the report, do we bounce it out? I mean, because I'm not sure that we can truly say it's insufficient unless we get further information on why the presence of a chlorine might not make it suitable as material that could be read across to the others.

**DR. HELDRETH:** Historically, we had the data on Benzophenone-7 in the original report; however, the conclusion did not include Benzophenone-7 because the Panel was of the opinion that this was not actually a cosmetic ingredient in use. And so, they didn't include it in their conclusion. So, the Panel hasn't concluded on this ingredient before. So this is essentially a new addition, or you can choose to not have it be a new addition.

**DR. BELSITO:** Okay, so we're just eliminating it from the report. There are no reported uses of it as a cosmetic product.

**DR. HELDRETH:** That's correct.

**DR. BERGFELD:** So, Don, are you giving a second to Jim's resent motion?

**DR. BELSITO:** If the conclusion is safe as used for Benzophenone-1, 2, 3, 4, 5, 6, 8, 9, 10, 11 and 12, yes.

**DR. SNYDER:** My only comment is we have not received any frequency and concentration of use data for Benzophenone-10, 12 or 7. So this report goes from Benzophenone-8, 9, to 11, so I would like to see that data to reassure that there's no reported uses.

**DR. HELDRETH:** Yeah, Dr. Snyder, we didn't see frequency of use in the VCRP for either of those ingredients, both in the 1983 data or the most recent data.

**DR. BERGFELD:** So, are we assuming they're not used?

**DR. HELDRETH:** That's what it appears to be. One thing I would remind the Panel, just because something is listed in the cosmetic dictionary doesn't mean it's actually an ingredient in use. There are over 20,000 chemicals listed in that dictionary, and from what we can see based on VCRP data there are no more than 7,000 actually in use right now. So, it's very likely that these two ingredients just aren't even ingredients particularly. They haven't been used and they're not in use now.

**DR. BERGFELD:** Are you suggesting that we not put those two in the conclusion? Similar to what was done years ago with Benzophenone-7?

**DR. HELDRETH:** I mean, that's a distinct possibility, that's one. The other possibility is to include them, and then if you feel like you have enough safety data to conclude on those, based on what's already in the report, then future use of those chemicals would already have a safety assessment provided.

**DR. BERGFELD:** Jim, do you want to comment on the lack of concentration of use in Benzophenone-10 and 12?

**DR. MARKS:** And then there was -- Paul, what was the other one you mentioned that didn't have concentration of use?

**DR. SNYDER:** Benzophenone-7, 10 and 12. The three that we're looking at, yeah.

**DR. MARKS:** Oh, okay. Benzophenone-10 and 12 are the ones we wanted to add, and presumably no-brainers.

**DR. SNYDER:** But, my only concern is to Don's point is that if we're excluding one because of a chemical property that we're concerned about, why not asked for the data that would clear it. Because otherwise I think the presumption is going to be, well, why can't you use Benzophenone-7? You can use Benzophenone-6 and 8, why can't you use 7? And so, how are they going to know that maybe they couldn't use Benzophenone-7, or have a concern about 7? That's my only concern.

**DR. BERGFELD:** Are you suggesting an insufficient data announcement?

**DR. SNYDER:** Just as a discussion point.

**DR. BERGFELD:** Anyone else? Jay, and then Lisa.

**DR. ANSELL:** Okay, let me remind you that this is the discussion about whether these three can be added relying exclusively and totally on the data which is currently in the report. If we have questions concerning Benzophenone-7 -- not because it's toxic but because of the chlorine suggest that read-across would not be appropriate -- or 10 or 12, the discussion isn't that do we have data or not. If we don't have data, then they should not be included. They should only be included if there are no questions about reliance on the existing data package.

**DR. BELSITO:** Yeah, and in terms of the fact that we don't have concentration of use, Paul, we deal with that all the time. There's an asterisk and we assume if it's used it would be used in the same concentrations as the other materials.

**DR. SNYDER:** Yeah, but in this case we have a concern; it's different.

**DR. BELSITO:** Why do you have a concern about Benzophenone-10 and 12?

**DR. SNYDER:** No, I don't, not Benzophenone-10 and 12. I'm just saying with 7, with the chlorinated.

**DR. BELSITO:** Yeah, but Jay just explained that.

**DR. SNYDER:** I understand.

**DR. BELSITO:** You know, Marks team felt it was a no-brainer, so it's been thrown out.

**DR. SNYDER:** But in our deliberations we have discussed, or our notes reflect, that we have a concern about it. So, it's not like, you know, we did look at data on that. We looked at the structure, and so it's kind of like, you know, we're kind of burying our heads in the sand about it.

**DR. BELSITO:** Well, we don't have a concern in terms of toxicity. We have a concern in the ability to read across from the other Benzophenones to this because of the chlorine molecule and potential differences in metabolism. We're not concerned about -- we're not saying anything about toxicity. We're not saying anything about anything, other than Ron Shank felt, and the other team agreed with him and I guess we are now agreeing with them, that the metabolism of Benzophenone-7 may be somewhat different from the others. And, therefore, it's not a no-brainer to read across from the others. So, we're eliminating it from the report. We're not making any comment on whether there would be safety issues for that.

**DR. BERGFELD:** So, the question I have of both Jim and Don is, relative to going forward with this amended report or just including it in a summary statement about the NTP report, because you have this question about Benzophenone-10 and 12 now.

**DR. MARKS:** No, I --

**DR. BELSITO:** We don't have a question about Benzophenone-10 and 12. Paul raised the issue that we don't have concentration in Benzophenone-7. So, I'll let him talk, but, I mean, let me hear from Curt and Dan. Do you have concerns about Benzophenone-10 and 12 in this report?

**DR. KLAASSEN:** No.

**DR. LIEBLER:** No, I don't.

**DR. SNYDER:** And neither do I. Neither do I; it was just that we have not been provided any data, on the three ingredients to add, regarding concentration of use. We've been told that it's not in use, but we haven't seen any data. And, I can take them at their word for that, but is the report going to include that there is no data?

**DR. BELSITO:** Well, it would show in the table of, you know, concentration of use that there are no reported uses.

**DR. SNYDER:** It's not there in the current document, that's all I'm saying. So I'd like to see it in the current document -- in the next document, okay. And I was just raising the issue that sometimes we do this and I don't think it looks very favorable that we have an issue that we're concerned about and then we don't deal with it, so...

**DR. BERGFELD:** So, what are you suggesting?

**DR. SNYDER:** No, we're fine. It's fine to move forward. We're fine to move forward just as is. It's fine.

**DR. BERGFELD:** But you're suggesting that we put the lack of use and concentration data statement into the document for those two ingredients. Is that correct?

**DR. SNYDER:** That table at the end should have "none reported" like all the rest of them have.

**DR. BERGFELD:** Okay.

**DR. GREMILLION:** If I can just insert my kind of layman's perspective. Saying an ingredient is safe as used when it's actually not used, it does seem kind of confusing. I also just wanted to add that going forward this might be an ingredient that the CIR gives special attention to given this FDA proposed rule that I think you can fairly read to kind of ban this ingredient, without further data, in sunscreens.

And, also the discrepancy between how the Europeans are treating this, which as we talked about yesterday that they have a different distinction between sunscreen and cosmetic products but they're still -- non-cosmetic products they've got a .5 percent limit, and this as used I think it's 1.6 percent. So, there's that discrepancy. So, I think, you know, there may be more attention on this than maybe some of the other ingredients that are being reviewed.

**DR. BELSITO:** But I think we tried to explain that to you, because the .5 was to protect from degradation of a cosmetic product, because in Europe sunscreens are considered cosmetic. So the fact that they allow it up to six percent in a sunscreen means they allow it up to six percent in a cosmetic when it's used as a sunscreen. The .5 limitation was to preserve the product from photo-degradation. So there's a difference there. Because in the United States --

**DR. GREMILLION:** Yeah, maybe the report can elaborate on that a little bit. That was surprising to me.

**DR. BELSITO:** Yeah. In the United States, sunscreens are over the counter medications.

**DR. BERGFELD:** OTC.

**DR. BELSITO:** They're not cosmetics. In Europe they are cosmetics.

**DR. GREMILLION:** If I can just add one thing. You read over that proposed rule from FDA too, it talks about things like, you know, it cites research on children under the age of two maybe not having the enzymes to metabolize this chemical. And, the things that, you know, I think are out in the news and people are paying attention to this and worried about the safety of those ingredients based on that rule. So, I just wanted to kind of flag that.

**MS. KOWCZ:** Thomas, this is Alex. I just wanted to make sure that everybody's very clear that it's Benzophenone-3 that the FDA is talking about, the oxybenzone, not the Benzophenone class. Just wanted to make sure everybody's clear.

And as Don mentioned, again, it's a different regulatory classification. It's cosmetics in Europe, and it's sunscreen as a drug in the United States. Just wanted to make sure that's clear. We're not lumping all the Benzophenones; they're talking about oxybenzone, Benzophenone-3, which is a very specific sunscreen allowed by the FDA in the United States.

**DR. GREMILLION:** Benzophenone-3 isn't one of the ingredients that are under review now?

**DR. MARKS:** It is.

**DR. LIEBLER:** So, I think Thomas has basically a pretty good point about the issue of what is permitted in Europe for sunscreen versus how sunscreens are handled in the United States, and the issue of photo protection of the product versus sunscreen action.

I think it would be worth including a couple of sentences in the last paragraph of the introduction just to explain those distinctions. Because, I think, not all readers are necessarily going to pick up on that. And, Thomas did indicate that he felt that was confusing, and I agree with him. I think that, you know, unless you've been able to sit in on our meetings for a couple of days you might not pick up on that distinction as well. So, that I would suggest we do as an editorial change.

**DR. BERGFELD:** I think that's a given, after this discussion.

**MR. JOHNSON:** Dr. Bergfeld, excuse me, may I make a comment?

**DR. BERGFELD:** Yeah, I was going to call on you Wilbur.

**MR. JOHNSON:** Thank you. Yes, I'd like to call the Panel's attention to PDF Page 13, and the third paragraph, in the "Use" section. And, that statement indicates the Benzophenones that are not currently being used in cosmetic products.

**DR. BELSITO:** Okay.

**DR. BERGFELD:** Can you just repeat those, Wilbur?

**DR. BELSITO:** Yeah, so it's Benzophenone-6, 7, 8, 10, 11 and 12. But, I think that Paul's point is that when you look at the table the 10 and 12 are not listed. Is that correct, Paul?

**DR. SNYDER:** That's correct.

**DR. BELSITO:** It's not that we don't say in the report they're not used. It's just typically they would be listed in the table with no reported uses. So, that table needs to be --

**DR. BERGFELD:** I think that we've cleared that up. I think that we accepted that as an editorial change.

**DR. BELSITO:** Yeah, I agree.

**DR. LIEBLER:** Wilma?

**DR. BERGFELD:** Yeah.

**DR. LIEBLER:** I'm sorry; I've got one more thing. Perhaps this counts as a palate cleanser, but I want to clear up one issue with Tom Slaga on tumor promotion. On PDF Page 36, under "Tumor Promotion", these are studies all with cultured cell models, 36 on to PDF 37. My understanding is that tumor promotion strictly speaking is an *in vivo* phenomenon.

And, I have seen this in our reports from time to time where cell studies are just listed under the category of tumor promotion. And, I thought that they probably ought to be listed somewhere else, perhaps under "Other Relevant Studies". But I want to make sure that I'm not off the rails on this issue. So, can you tell me what you think about this?

**DR. SLAGA:** Yes, in general, tumor promotion is an *in vivo* response. There are several cell-culture models that try to mimic it, and the data is actually pretty good. So, you know, what most people would call this would be *in vitro* transformation enhancement or something like that. You're right, it's a little different here; it's not really tumor promotion *in vivo*.

All those other studies are really -- the carcinogenicity studies, the NTP are all *in vivo*. They do *in vitro* work too, like genotoxicity and that type of thing. Nancy Colburn, when she was alive, pushed tumor promotion *in vitro* a lot, but in modifying transformation of cells in culture.

**DR. LIEBLER:** So, are you okay with this heading as it is and having it under the carcinogenicity section?

**DR. SLAGA:** Well, yeah, it's more relevant than any other place to put it, that's the problem.

**DR. LIEBLER:** Okay.

**DR. PETERSON:** I agree with that.

**DR. LIEBLER:** Okay, I wanted to hear your feedback you guys. Thanks, and I withdraw my comment on that. So I'll redo my comments on the report. Thank you.

**DR. KLAASSEN:** I'd like to add my two cents here. I guess I would like to keep it in this section of the report, but call it "In Vitro Cell Transformation," or something like that.

**DR. SLAGA:** Yeah, that would be fine.

**DR. BERGFELD:** Okay, let's accept that. Jim, are you there?

**DR. MARKS:** Yes.

**DR. BERGFELD:** I'd like you to come back and summarize where you think we are with this.

**DR. MARKS:** So, after this robust discussion, which was really quite good, David, now you get a sense of how we go back and forth on day two. I will change our team's motion to be an amended tentative report with a safe conclusion -- that implies we reopened it -- and that we added Benzophenone-10 and 12, because they're no-brainers, and we handle the concentration of use as we've done in the past. If 10 and 12 were used, they would be similar concentration of the others. And we delete Benzophenone-7, because it's a chlorinated compound.

And, we had a lot of discussion about that. I thought perhaps, at least I think I got the sense, Paul, that you were concerned and maybe several others that if we deleted Benzophenone-7 it might look like we're ignoring it. We could always address the reason why we deleted it in the discussion.

**DR. SNYDER:** Oh, that's not necessary. I just felt that the two we're adding are not in use, and so then if we use that caveat, they're not in use, so, yeah, it's a no-brainer to add something that's not in use. And, it has similar physical and chemical properties, metabolism, and etcetera. But then when we say, well, we can't add the other one because we have a concern about the chemical property, I thought it just, you know, it's a moot point. I think the discussion was good. I think it was healthy and we can move forward.

**DR. BERGFELD:** Don, can I assume you're going to second this motion that's been restated?

**DR. BELSITO:** Yeah, I'll second it. I just have one additional comment, just for consideration. And that is, in addition to endocrine disruption the other big thing with oxybenzone, Benzophenone-3, is environmental. And, I, you know, I'm just wondering whether it might not be reasonable at some point perhaps in the introduction to point out that the purview of our panel is to look at safety and human health and not environment. And, so, we're not saying that we looked at what the effect of oxybenzone might be on coral, etcetera.

**DR. BERGFELD:** I think treat that as an edit, go ahead.

**DR. BELSITO:** Yeah, I know, that is an edit, but do people want to include that? That's the question.

**DR. BERGFELD:** Any comment on that? I see that as a no-brainer.

**DR. SNYDER:** Well, I think it has to be included in the discussion because it's banned in Hawaii.

**DR. BELSITO:** Right. And, it's banned elsewhere because of environmental effects.

**DR. BERGFELD:** I see that we'll include it; there's no other comment.

**DR. BELSITO:** Yeah, I mean, I think just a statement in the introduction that we're looking at its safety in terms of human health and not the environmental impact.

**DR. BERGFELD:** Do you think it should also go to the discussion?

**DR. BELSITO:** I don't think it has to go back into the discussion. We've already stated that the purview of the panel is human health.

**DR. BERGFELD:** Okay. All right. Any other discussion before we call the question?

**MR. JOHNSON:** Yes, Dr. Bergfeld?

**DR. BERGFELD:** Wilbur, go ahead.

**MR. JOHNSON:** Yes, Dr. Bergfeld, what specifically does the Panel want stated in the discussion?

**DR. BELSITO:** Basically that the systemic effects were seen at concentrations not relevant to cosmetic exposure, that there's low sensitization, irritation, photosensitization, or phototoxicity with these materials. That's what my panel had.

**DR. MARKS:** We also need to mention the NTP studies, which Tom elucidated.

**DR. SLAGA:** Yeah. We should have a discussion point about NTP in the discussion.

**DR. BERGFELD:** Okay, any other comments about the discussion? Wilbur, do you need anything else?

**MR. JOHNSON:** Yes, one other question in relation to what Dr. Belsito just stated. So, the Panel is not concerned about -- given the high concentration of exposure in the systemic toxicity studies, there's no concern about phototoxicity, photosensitization. Are there other endpoints that are of no concern as well?

**DR. BERGFELD:** Don, do you want to comment on that?

**DR. BELSITO:** No, I mean, I think those were the issues and I don't know if Paul wants to expand on the results of the NTP study in terms of these questionable effects in male rats.

**DR. SNYDER:** No, I mean, you captured it all. The basic premise was that the toxicity profile had NOAELs at levels that were not relevant to cosmetic use. I don't think we need to talk very much about the NTP study other than just report what the results were. It's largely a negative study, yes, they do use the term equivocal, but there's no dose response -- one finding was found in the mid-dose, not in the high.

And, so there are no red flags there in my opinion, that's a pretty clean study. And the mouse study was completely clean. I think we have great confidence in that data, great confidence in the rest of the tox data, that we can just state, as Don stated, that in lieu of the NOAELs on all of the systemic tox data not relevant to cosmetic use. So, I think we're fine.

**DR. BERGFELD:** Wilbur, does that answer your questions?

**MR. JOHNSON:** So, that means we just mention the Panel's lack of concern about systemic toxicity, and not bother to mention any specific endpoints such as phototoxicity, or photosensitization, or genotoxicity.

**DR. BELSITO:** No.

**MR. JOHNSON:** Okay, thank you.

**DR. BERGFELD:** All right, any other discussion before we call the question on this particular ingredient? It's been first and seconded as a motion.

We're going to move forward then. Mr. Marks, do you want to restate the conclusion so that we know what we're voting on?

**DR. MARKS:** So, it's an amended tentative report with a safe conclusion for Benzophenone-1, 2, 3, 4, 5, 6, 8, 9, 11, and add 10 and 12.

**DR. BELSITO:** Second.

**DR. BERGFELD:** Okay, no discussion I assume, but if there is some speak up. Hearing none, I'm going to call reverse. All those that disagree with this conclusion, please indicate by stating your name. I'm going to assume that everyone else is voting for it, so it's a unanimous safety report.

## Amended Safety Assessment of Benzophenones as Used in Cosmetics

---

Status: Draft Final Amended Report for Panel Review  
Release Date: February 16, 2021  
Panel Date: March 11-12, 2021

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.; Daniel C. Liebler, Ph.D.; Lisa A. Peterson, Ph.D.; Ronald C. Shank, Ph.D.; Thomas J. Slaga, Ph.D.; and Paul W. Snyder, D.V.M., Ph.D. Previous Panel member involved in this assessment: James G. Marks, Jr., M.D. The Cosmetic Ingredient Review (CIR) Executive Director is Bart Heldreth, Ph.D. This report was prepared by Wilbur Johnson, Jr., M.S., Senior Scientific Analyst/Writer, CIR and Jinqiu Zhu, Ph.D., Toxicologist, CIR.

**ABSTRACT:** The Expert Panel for Cosmetic Ingredient Safety (Panel) reassessed the safety of benzophenones in cosmetic products; these ingredients are reported to function mainly as light stabilizers in cosmetics. The Panel reviewed the relevant data relating to the safety of these ingredients in cosmetic formulations provided in this safety assessment, and data from the previously published safety assessments, and concluded that Benzophenone-1, -2, -3, -4, -5, -6, -8, -9, -10, -11, and -12 are safe in cosmetics in the present practices of use and concentration described in this safety assessment.

## **INTRODUCTION**

The safety of Benzophenone-1, -2, -3, -4, -5, -6, -8, -9, -10, -11, and -12, as used in cosmetics, is being evaluated in this safety assessment. The Expert Panel for Cosmetic Ingredient Safety (Panel) originally published a safety assessment of 6 of these ingredients with the following conclusion in 1983: “On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics.”<sup>1</sup> During the same year, the Panel also published an addendum to this existing safety assessment, having concluded that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic, and that the published conclusion on Benzophenones-1, -3, -4, -5, -9, and -11 is applicable to these 3 ingredients.<sup>2</sup> In accordance with the Cosmetic Ingredient Review (CIR) Procedures & Support to the Expert Panel for Cosmetic Ingredient Safety document, the Panel evaluates the conclusions of previously-issued reports every 15 years. Thus, the Panel re-evaluated the conclusion, and in 2005, published re-review summary that stated the Panel determined to not reopen the 1983 published safety assessment until results from National Toxicology Program (NTP) carcinogenicity studies on benzophenones are available.<sup>3</sup>

The NTP carcinogenicity study on Benzophenone-3 was published in May 2020, and accordingly, the Panel re-opened the review of the benzophenones listed above. Additionally, the Panel determined that it was appropriate to include Benzophenone-10 and -12 in this report. Results from the NTP study are included in the current safety assessment, as are other safety test data on benzophenones that have been identified in the published literature since the original safety assessment was published in 1983. Data from the original CIR safety assessments on benzophenones appear in *italics*, when available, at the beginning of each section in the report text. (This information is not included in the Summary section.) For complete and detailed information, please refer to the original documents, which are available on the CIR website (<https://www.cir-safety.org/ingredients>).

According to the web-based *International Cosmetic Ingredient Dictionary and Handbook* (WINCI; *Dictionary*), the benzophenones reviewed in this safety assessment are reported to function mainly as light stabilizers in cosmetic products, but some are also reported to function as sunscreens (see Table 1).<sup>4</sup> In the United States (US), sunscreens are active ingredients in over-the-counter (OTC) drug products, and are not cosmetic ingredients (21 CFR 352.10); however, in Europe, sunscreens are classified as cosmetics.

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 from year 1983 forward. A listing 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 provided on the CIR website (<https://www.cir-safety.org/supplementaldoc/preliminary-search-engines-and-websites>; <https://www.cir-safety.org/supplementaldoc/cir-report-format-outline>). Unpublished data may be provided by the cosmetics industry, as well as by other interested parties. Dossiers for Benzophenones-1, -3, -4, -8, and -12 were found on the European Chemicals Agency (ECHA) website.<sup>5-9</sup> The ECHA website provides summaries of information generated by industry, and it is those summary data that are reported in this safety assessment when ECHA is cited.

## **CHEMISTRY**

### **Definition and Structure**

*Benzophenones-1 to -12 are substituted derivatives of 2-hydroxybenzophenone.<sup>1</sup> Substituents include hydroxy, methoxy, octyloxy, sulfonyl, methyl, and chloride groups. Benzophenones may be mono-, di-, tri-, or tetra-substituted.*

Definitions, CAS numbers, and individual structures of the benzophenones included in this report are presented in Table 1.

### **Chemical Properties**

*An important property of benzophenones is their ability to absorb and dissipate ultraviolet (UV) radiation.<sup>1</sup> Most benzophenones are solid at room temperature, soluble in organic solvents, and insoluble in water.*

The benzophenones reviewed in this safety assessment are solid compounds with molecular weights ranging from 214.21 Da (Benzophenone-1) to 366.44 Da (Benzophenone-12). Properties of benzophenones are presented in Table 2.<sup>1,10</sup>

### **Method of Manufacture**

*The most common method of production of benzophenones is the Friedel-Crafts reaction.<sup>1</sup> No further manufacturing information, specific to the cosmetic ingredients, has been found in the published literature or submitted as unpublished data.*

## Composition/Impurities

Values for the maximum moisture content of benzophenones have been reported as follows: Benzophenone-1 (2%), Benzophenone-2 (5%), Benzophenone-3 (13%), Benzophenone-4 (10% to 16%, trihydrate form), Benzophenone-6 (0.5%), Benzophenone-8 (2%), Benzophenone-9 (5%), and Benzophenone-11 (5%).<sup>1</sup>

A maximum concentration of 1 ppm arsenic as an impurity has been recommended for Benzophenones-1, -2, -3, -4, -6, -9, and -11.<sup>1</sup> The following maximum concentrations for lead as an impurity in benzophenones have been recommended: Benzophenone-1 (18 ppm), Benzophenone-2 (8 ppm), Benzophenone-3 (13 ppm), Benzophenone-4 (18 ppm), Benzophenone-6 (13 ppm), Benzophenone-9 (8 ppm), and Benzophenone-11 (13 ppm).

## USE Cosmetic

The safety of the cosmetic ingredients included in this report is evaluated based, in part, on data received from the US Food and Drug Administration (FDA) and the cosmetics industry on the expected use of this ingredient in cosmetics. Use frequencies of individual ingredients in cosmetics are collected from manufacturers and reported by cosmetic product category in the FDA Voluntary Cosmetic Registration Program (VCRP) database. Use data are submitted by the cosmetics industry in response to surveys, conducted by the Personal Care Products Council (Council), of maximum reported use concentrations by product category. The concentration of use survey on benzophenones was conducted for ingredient use as a light stabilizer, but not as a sunscreen. It is important to note that sunscreens are classified as cosmetics in Europe, but not in the United States. It is within the Panel's purview to review cosmetic ingredients in relation to human health and safety, but not for environmental safety.

In the 1983 original report, Benzophenone-2 was the benzophenone with the highest reported use frequency (229 uses total).<sup>1</sup> In 2021, Benzophenone-4 was the benzophenone with the highest reported use frequency (1226 uses total).<sup>11</sup> The use frequency of Benzophenone-2 (299 uses total), which was the highest use frequency reported in the 1983 report, decreased to a value of 55 in 2021. The use frequency of Benzophenone-4 (240 uses) in the 1983 original report increased substantially to a value of 1226 in 2021. Of the ingredients reviewed in the 1983 report, Benzophenone-4 had the highest use concentration ( $\leq 10\%$  in suntan gels, creams and liquids (leave-on products)).<sup>1</sup> In 2020, Benzophenone-4 is the benzophenone with the highest reported use concentration, and is used at substantially lower concentrations of up to 1.6% in other non-coloring hair preparations (leave-on products).<sup>12</sup> Frequency and concentration of use data are presented in Table 3.

According to VCRP and Council survey data, 5 of the benzophenones reviewed in this safety assessment are not currently in use in cosmetic products. These ingredients are presented in Table 4.

Cosmetic products containing benzophenones may be applied to the skin or, incidentally, may come in contact with the eyes (e.g., Benzophenone-4 in eye makeup preparations at concentrations up to 0.2%). Benzophenone-3 is used in products that come in contact with mucous membranes during product use (maximum use concentrations up to 0.5% in bath soaps and detergents). Additionally, Benzophenone-3 could be incidentally ingested (maximum use concentrations up to 0.5% in lipstick). In baby products, Benzophenone-3 is being used at maximum concentrations up to 0.25% (in baby lotions, oils, and creams (not powder)). Products containing benzophenones may be applied as frequently as several times per day and may come in contact with the skin for variable periods following application. Daily or occasional use may extend over many years.

Benzophenone-3 is being used in aerosol hair spray (maximum concentration of 0.014%), pump hair spray (maximum concentration of 0.05%), and in pump deodorant spray (at maximum concentration of 0.08%). Higher concentrations (up to 0.5%) are used in fragrance formulations. Benzophenone-4 is also being used in aerosol hair spray (maximum concentration of 0.015%) and pump hair spray (maximum concentrations of 0.1%). In practice, 95% to 99% of the droplets/particles released from cosmetic sprays have aerodynamic equivalent diameters  $> 10 \mu\text{m}$ , with propellant sprays yielding a greater fraction of droplets/particles below  $10 \mu\text{m}$ , compared with pump sprays.<sup>13-16</sup> Therefore, most droplets/particles incidentally inhaled from cosmetic sprays would be deposited in the nasopharyngeal and bronchial regions and would not be respirable (i.e., they would not enter the lungs) to any appreciable amount.<sup>13,14</sup> There is some evidence indicating that deodorant spray products can release substantially larger fractions of particulates having aerodynamic equivalent diameters in the range considered to be respirable.<sup>14</sup> However, the information is not sufficient to determine whether significantly greater lung exposures result from the use of deodorant sprays, compared to other cosmetic sprays. Benzophenone-3 is also being used in face powders (use concentrations unknown). 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.<sup>17-19</sup>

Benzophenone-3, Benzophenone-4, and Benzophenone-5, but not the other benzophenones in this safety assessment, are included on the European Union's list of ultraviolet light (UV) filters allowed in cosmetic products.<sup>20</sup> A maximum concentration of 6 % Benzophenone-3 (as a UV filter) is allowed in ready for use preparations. Not more than 0.5% Benzophenone-3 is allowed to protect the product formulation. Benzophenone-4 and Benzophenone-5 are allowed in ready for use cosmetic preparations at concentrations up to 5% (as acid).



## **Non-Cosmetic**

According to the US FDA proposed rule issued in 2007, the following benzophenones were allowed in sunscreens as active ingredients within the concentration specified for each ingredient: Benzophenone-3 (a.k.a. oxybenzone, up to 6%), Benzophenone-4 (a.k.a. sulisobenzone, up to 10%), and Benzophenone-8 (a.k.a. dioxybenzone, up to 3%) (21 CFR 352.10). On February 26, 2019, the FDA published another proposed rule to establish final monograph regulations for OTC sunscreen drug products (84 FR (38) 6204).<sup>21</sup> The rule now proposes that the following 3 benzophenones would be excluded from the final monograph because there are insufficient data to determine whether they are generally recognized as safe and effective (GRASE): Benzophenone-3, Benzophenone-4, and Benzophenone-8. Particularly, given the available data showing significant transdermal absorption and systemic availability of Benzophenone-3, as well as the potential for endocrine activity, FDA proposes that Benzophenone-3 is not GRASE for use in sunscreens without further data. FDA has determined that the following data on Benzophenone-3 are needed: human absorption data (including metabolite study in humans); non-clinical safety studies (toxicokinetics, dermal carcinogenicity, and systemic carcinogenicity); developmental and reproductive toxicity (if developmental and reproductive toxicity (DART) studies do not resolve the concerns raised in the literature relating to potential endocrine disruption, it may be possible to resolve these concerns through additional testing); and FDA is seeking input on whether additional studies or contraindication are necessary to support the safety of sunscreens containing Benzophenone-3 for children under 2 years of age. FDA has determined that the following data on Benzophenone-4 and Benzophenone-8 are needed: dermal irritation and sensitization testing; phototoxicity and photoallergenicity testing; human maximal use bioavailability studies; post-marketing adverse event reports; dermal carcinogenicity; systemic carcinogenicity; DART; toxicokinetics; and additional testing when data suggest a concern about other long-term effects, such as endocrine effects.

According to the proposed rule, FDA expects that a systemic carcinogenicity study would not be needed to support a GRASE determination for a sunscreen active ingredient if an adequately conducted human pharmacokinetic maximal use trial (MUST) resulted in a steady state blood level less than 0.5 ng/ml, and an adequately conducted toxicology program did not reveal any other safety signals for the ingredient or any known structurally similar compound indicating the potential for adverse effects at lower levels. The threshold value of 0.5 ng/ml is based on the assessment that the level would approximate the highest plasma level below which the carcinogenic risk of any unknown compound would be less than 1 in 100,000 after a single dose.

Benzophenone-3 is among the substances listed by FDA as indirect food additives (substances for use as basic components of single and repeated use food contact surfaces) (21CFR177.1010). Furthermore, Benzophenone-12 may be safely used as an antioxidant and/or stabilizer in polymers used in the manufacture of articles or components of articles intended for use in producing, manufacturing, packing, processing, preparing, treating, packaging, transporting, or holding food, subject to the following limitations (21CFR178.2010): For use only at levels not to exceed 0.5% by weight of olefin copolymers complying with section 177.1520 I.

## **TOXICOKINETIC STUDIES**

### **Dermal Penetration**

#### **In Vitro**

##### **Benzophenone-3**

Sunscreen products were applied to excised human epidermis in Franz diffusion cells, with the amounts of sunscreen ingredients penetrating into and across the human epidermis assessed by high performance liquid chromatography (HPLC) for 8 h following application. The receptor fluid consisted of bovine serum albumin in phosphate-buffered saline.<sup>22</sup> Benzophenone-3 penetrated human skin to the receptor phase (0.08 g/m<sup>2</sup> or 10% of applied dose) after the 8-h study period.

The penetration of Benzophenone-3 across excised human epidermis and high-density polyethylene (HDPE) membrane was measured using in vitro Franz-type diffusion cells.<sup>23</sup> Human epidermal tissue (abdominal region of 1 female) was obtained by blunt dissection of full-thickness skin and heat separation. The tissue was mounted between the donor and receptor chambers of the diffusion cell, and the surface area available for diffusion was 1.18 cm<sup>2</sup>. The receptor chamber volume was 3.4 ml, and the receptor fluid was bovine serum albumin (4%) in phosphate-buffered saline. Both penetration and epidermal retention were measured following application of infinite and finite (epidermis only) doses of Benzophenone-3 (2%) in the following 5 vehicles: liquid paraffin, coconut oil, 50:50 ethanol:coconut oil, aqueous cream, and oily cream. For the infinite dose studies, an aliquot (200 mg/cm<sup>2</sup>) of each formulation was applied to the epidermal surface under occlusion. For the finite dose studies, an aliquot of each formulation (20 mg/cm<sup>2</sup>) was applied without occlusion. Benzophenone-3 remaining in the epidermis (R<sub>s</sub>, µg) was extracted twice with methanol and quantified using HPLC. The highest Benzophenone-3 skin retention was observed for the 50:50 ethanol:coconut oil combination. Maximal and minimal Benzophenone-3 fluxes were observed from liquid paraffin and coconut oil, respectively.

In the infinite dose study, statistically significant differences existed between all 5 formulations with respect to penetration of Benzophenone-3 across HDPE membrane, after application of an infinite dose in a range of formulation vehicles. The order of flux (highest to lowest) was: liquid paraffin > oily cream > 50:50 ethanol:coconut oil > coconut oil.

For Benzophenone-3 penetration across epidermal membrane, liquid paraffin was greater than 50:50 ethanol:coconut oil; however, the difference between the 2 vehicles was not statistically significant. For the remaining vehicles, the order of flux (high to low) was oily cream > aqueous cream > coconut oil. Statistically significant differences ( $p < 0.05$ ) existed between the Benzophenone-3 fluxes across the epidermis for these formulation vehicles.

In the finite dose study (mimicking the real-life situation), the percentage of applied Benzophenone-3 dose absorbed ranged between 1.97% from coconut oil and 9.97% from liquid paraffin. A comparison of the maximum amount of Benzophenone-3 that penetrated indicated that liquid paraffin and coconut oil statistically significantly differed from each other and the remaining formulations. The highest Benzophenone-3 skin retention was observed for 50:50 ethanol:coconut oil. The alcohol-based vehicle showed low Benzophenone-3 release from the vehicle, but high skin penetration and retention. The authors concluded that sunscreen chemicals applied to the skin are substantially retained in the superficial layers of the stratum corneum. They also noted that the results of this study also indicated that the release and skin penetration of Benzophenone-3 was influenced by the formulation vehicle in which it was applied to the membrane.

Benzophenone-3 (10% in water-in-oil or oil-in-water emulsion) was evaluated in a skin penetration study involving full-thickness pig ear skin *in vitro*.<sup>24</sup> Both fresh and previously frozen pig ear skin were used. The skin permeation of Benzophenone-3 (in water-in-oil emulsion) was described as rapid, i.e., after 1 h of skin exposure to 2 mg/cm<sup>2</sup>. After 1 h, skin permeation was  $\geq$  the limit of quantification (0.615  $\mu\text{g}/\text{cm}^2$ ). Approximately 0.5% of the applied dose passed into the receptor fluid (phosphate-buffered saline). The absorption rate was higher from the water-in-oil emulsion than from the oil-in-water emulsion. After 24 h of skin exposure, the amount of Benzophenone-3 that passed through the frozen-stored skin was  $27.2 \pm 1.3 \mu\text{g}/\text{cm}^2$  (from water-in-oil emulsion) and  $22.1 \pm 1.1 \mu\text{g}/\text{cm}^2$  (oil-in-water emulsion). Additionally, after 24 h of exposure, the amount of Benzophenone-3 that passed through fresh skin was  $22.4 \pm 0.9 \mu\text{g}/\text{cm}^2$  (from water-in-oil emulsion) and  $17.6 \pm 0.8 \mu\text{g}/\text{cm}^2$  (from oil-in-water emulsion).

#### Benzophenone-3 and Benzophenone-4

Static diffusion cells were used to evaluate the skin penetration of Benzophenone-3 and Benzophenone-4 *in vitro*.<sup>25</sup> The limits of detection were 20  $\mu\text{g}/\text{l}$  (for Benzophenone-3) and 90  $\mu\text{g}/\text{L}$  (for Benzophenone-4). Human skin from abdominal or breast surgery was used. The mean amount found in the receptor fluid was  $1.0 \pm 0.4 \mu\text{g}/\text{cm}^2$  for Benzophenone-3, compared to  $1.1 \pm 0.8 \mu\text{g}/\text{cm}^2$  for caffeine (known as a good penetrating compound). The amount of Benzophenone-4 in the receptor fluid was below the limit of detection.

The percutaneous absorption of Benzophenone-3 and Benzophenone-4 (each in an oil-in-water emulsion) was evaluated *in vitro* using fresh human skin of women who had undergone breast or abdominal surgery.<sup>26</sup> The skin (epidermal side up) was positioned on the lower part of the diffusion cell, and 3 mg/cm<sup>2</sup> of test formulation applied. Exposure times of 30 min and 16 h were observed. For Benzophenone-3, there was no difference between the mean quantity found in the stratum corneum after 30 min or 16 h. Benzophenone-3 penetrated very quickly and saturated the stratum corneum in less than 30 min, and was found in the receptor fluid. For Benzophenone-4, the quantity found after 30 min ( $2.1 \pm 1.3 \mu\text{g}/\text{cm}^2$ ) was statistically significantly less than that found after 16 hours ( $4.0 \pm 1.8 \mu\text{g}/\text{cm}^2$ ). Benzophenone-4 was found in the stratum corneum, epidermis, dermis, and receptor fluid.

### **Animal**

#### Benzophenone-3

A study was performed to investigate whether long-wavelength UV (UVA; maximum wavelength from lamp = 365 nm) and mid-wavelength UV (UVB; maximum wavelength from lamp = 312 nm) affect the absorption of Benzophenone-3 through the skin.<sup>27</sup> The dorsal skin of female nude mice (ICR-Foxn<sup>mu</sup> strain) was subjected to UVA (24 and 39 J/cm<sup>2</sup>) or UVB (150, 200, and 250 mJ/cm<sup>2</sup>) irradiation. UVA irradiation was performed every other day, and each mouse was exposed 3 times over a 5-d period. UVB irradiation was performed once a day for 5 d. The interval between each UVB irradiation was 24 h. Irradiated skin was excised from the mouse (back) immediately after the last UV exposure. Senescent skin (24 wk old) was used for comparative purposes. *In vitro* skin absorption was evaluated using a Franz cell. The donor compartment was filled with Benzophenone-3 (3.5 mg/ml in 30% ethanol/double distilled water). The receptor was loaded with 30% ethanol in pH 7.4 buffer. The duration of the experiment was 48 h. When compared to intact skin, a negligible change in skin absorption after UVA exposure was found, though there was a slight increase in flux at a dose of 24 J/cm<sup>2</sup>. UVB exposure resulted in a decrease in skin deposition of Benzophenone-3 (statistically significant ( $p < 0.05$ ) at dose of 250 mJ/cm<sup>2</sup>); no statistically significant decrease was detected at doses of 150 and 200 mJ/cm<sup>2</sup>. UVB exposure at doses of 200 and 250 mJ/cm<sup>2</sup> caused a slight, but statistically significant ( $p < 0.05$ ) enhancement of Benzophenone-3 flux. The values for Benzophenone-3 flux were:  $11.92 \pm 0.74 \mu\text{g}/\text{cm}^2/\text{h}$  (normal),  $14.05 \pm 0.17 \mu\text{g}/\text{cm}^2/\text{h}$  (UVA at 24 J/cm<sup>2</sup>),  $12.02 \pm 0.11 \mu\text{g}/\text{cm}^2/\text{h}$  (UVA at 34 J/cm<sup>2</sup>),  $8.04 \pm 1.40 \mu\text{g}/\text{cm}^2/\text{h}$  (UVB at 150 mJ/cm<sup>2</sup>),  $13.98 \pm 0.06 \mu\text{g}/\text{cm}^2/\text{h}$  (UVB at 200 mJ/cm<sup>2</sup>), and  $20.73 \pm 0.03 \mu\text{g}/\text{cm}^2/\text{h}$  (UVB at 250 mJ/cm<sup>2</sup>). The skin absorption parameters of intrinsically aged skin and young skin were comparable.

## **Human**

### **Benzophenone-3**

The skin penetration of Benzophenone-3 was evaluated in vivo using 6 healthy volunteers (mean age =  $37.3 \pm 7.7$  years) who were free of any dermatological disorders.<sup>28</sup> In the first step, the percentage absorption was measured using an occlusive and difference method. A solution consisting of 0.5 mg of Benzophenone-3 in 10  $\mu$ l of acetone (2190 nmol) was applied. Following Benzophenone-3 application, any residual formulation was washed off, and the amount removed and analyzed. In the second step, the tape stripping method (a useful procedure for selectively removing the skin's outermost layer, the stratum corneum, and measuring the stratum corneum adsorption) was performed. Benzophenone-3 [1000 nmol in 20  $\mu$ l of ethylene glycol:triton X100 (90:10 v/v)] was applied to the surface of the skin. The human skin permeation of Benzophenone-3 over a period of 4 h was near 35% of the applied dose with the occlusive method. The amount of topically applied Benzophenone-3 found in the stratum corneum after 30 minutes of exposure using the stripping procedure was evaluated at 4% of the applied dose.

A human study was performed (5 males, 7 females) as a crossover design with sunscreen application to the face or back on day 1, followed by application to the other side on day 8 of the study.<sup>23</sup> A sunscreen lotion with the following composition was applied at a rate of 2 mg/cm<sup>2</sup> to an equal-sized area (112 cm<sup>2</sup>) on the face or back of the volunteers: 8% (w/v) homosalate, 7.5% (w/v) octyl methoxycinnamate, 6% (w/v) Benzophenone-3, and 5% (w/v) octyl salicylate. The sunscreen lotion remained occluded for 8 h before it was removed by washing. An area of the skin was immediately tape-stripped using clear tape (3 cm x 1.9 cm). The stratum corneum was sequentially stripped 16 times on the back and 6 times on the face. Sunscreen content in all samples was analyzed. Urine output over 48 h post-application was collected. Blood samples were taken at pre-application baseline and at a suitable steady-state time after application (7.5 h). A substantial amount of all sunscreen chemicals in the stratum corneum of the back was noted after 8 h. Greater amounts of sunscreen were present in the superficial layers (ranging from ~4% to 10% of the applied dose) than in the deeper layers. Approximately 2 to 4 times the amount of sunscreen was present in the superficial stratum corneum layers of the face, when compared to the back. The difference in absorption between the anatomical sites was statistically significant for Benzophenone-3, octyl salicylate, and homosalate only. The percentage of applied dose in the 6 superficial layers of the stratum corneum was ~10%, 18%, 18%, and 25% for homosalate, octyl methoxycinnamate, Benzophenone-3, and octyl salicylate, respectively. Sunscreens were not detected in the plasma or urine samples.

### **Benzophenone-4**

Benzophenone-4 (in water; 6 mg/ml) was deposited on the skin of each of 21 healthy women (22 to 34 years old; mean age =  $25 \pm 3$  years).<sup>29</sup> Twenty  $\mu$ l of solution were applied. Skin strippings were performed at 1 to 7 h after treatment. The stratum corneum was removed (with transparent adhesive tape) by a series of 6 strippings. After 1 h, and for the first strip, 70% of the Benzophenone-4 remained at the level of the stratum corneum (compared to 40% for PEG-25 PABA [para-aminobenzoic acid]). At 7 h, 40% of the Benzophenone-4 remained at the level of the stratum corneum (compared to 20% for PEG-25 PABA).

## **Absorption, Distribution, Metabolism, and Excretion (ADME)**

### **In Vitro**

#### **Benzophenone-2**

The fate of Benzophenone-2 was studied in human and zebrafish in vitro cell models.<sup>30</sup> In the human in vitro cell models, Benzophenone-2 was metabolized into a variety of gluco- and sulfo-conjugated metabolites. Similar patterns of Benzophenone-2 biotransformation were observed among zebrafish models (primary hepatocytes, ZFL, and ZELH-zfER cell lines). Metabolic patterns in the zebrafish models and human hepatic cell line HepaRG shared many similarities, while biotransformation rates in the cell lines MELN (human female cancer (invasive ductal carcinoma) cell line) and T47D-KBLuc (human female cancer (mammary gland breast/duct) cell line) were quantitatively low and qualitatively different.

#### **Benzophenone-3**

Benzophenone-3 (0.1  $\mu$ mol) was incubated for 15 min with liver microsomes from untreated Sprague-Dawley rats in the presence of NADPH (1  $\mu$ mol).<sup>31</sup> 2,5-Dihydroxy-4-methoxybenzophenone, metabolite of Benzophenone-3, was formed. Another metabolite, 2,4-dihydroxybenzophenone (Benzophenone-1, the 4-desmethylated metabolite), was also formed. The amount of 2,5-dihydroxy-4-methoxybenzophenone formed in vitro was approximately the same as 2,4-dihydroxybenzophenone. Data on the specific amount of each metabolite were not included.

The metabolism of Benzophenone-3 by rat and human liver microsomes was studied.<sup>32</sup> When Benzophenone-3 (10  $\mu$ M) was incubated for 15 min with rat liver microsomes in the presence of NADPH, the following metabolites resulted: 2,4,5-trihydroxybenzophenone; 3-hydroxylated benzophenone-3; 5-hydroxylated benzophenone-3; Benzophenone-1; and 2,3,4-trihydroxybenzophenone. Benzophenone-3 was also metabolized by human liver microsomes, yielding Benzophenone-1 and 5-hydroxylated benzophenone-3.

## Animal

### **Dermal**

#### Benzophenone-2

A study was performed, using groups of 10 male Wistar rats, to determine the concentrations of Benzophenone-2 in the rat brain after topical administration.<sup>33</sup> Benzophenone-2 was dissolved in a small amount (volume not stated) of ethanol and olive oil and formulated with Hascobase. The test substance was then applied to shaved skin at a dose of 100 mg/kg twice per day for 4 wk (days per wk not stated). Hascobase, with a small amount of ethanol and olive oil, was applied to the skin of control rats. Blood and tissue Benzophenone-2 concentrations in the frontal cortex and hippocampus were determined. After dermal application (24 h after last dose at 4 wk), the blood level of Benzophenone-2 was ~300 ng/ml. Liver and adipose tissue concentrations were 1354 ng/g wet tissue and 823 ng/g wet tissue, respectively. In the brain structures studied, the Benzophenone-2 concentration ranged from 5 to 19 ng/g tissue. In the hippocampus, the Benzophenone-2 concentration was approximately 3.5-fold lower in the frontal cortex.

To assess the concentration of total Benzophenone-2 (parent compound and its metabolites – glucuronide and sulfate), the liver was homogenized and plasma was mixed with 1 M ammonium acetate buffer. Prior to incubation of the homogenate for 6 h, freshly prepared enzyme mixtures ( $\beta$ -glucuronidase and sulfatase) were added. After hydrolysis with  $\beta$ -glucuronidase and sulfatase, the Benzophenone-2 peak was significantly higher than in the same serum and liver samples before hydrolysis. Calculation of the Benzophenone-2 concentration from the calculated standard curves revealed that the test compound was present in the plasma of treated animals at concentrations ranging from 164 to 648 ng/ml (average = 324 ng/ml; 1.3  $\mu$ M). After hydrolysis, the Benzophenone-2 concentration was 2218 ng/ml (9  $\mu$ M). These results indicated that, in the blood, there was more of the Benzophenone-2 metabolites than the parent compound. Additionally, in the liver, the Benzophenone-2 concentration after hydrolysis was much higher (3758 ng/g) when compared to the free form of the compound (1482 ng/g). Benzophenone-2 concentrations in all examined tissues in control animals were below the detection limit. The authors noted that the results of this study indicate that Benzophenone-2 passes through the blood-brain barrier, but that its concentration in the brain structures is much lower than in the blood.

#### Benzophenone-3

A study was performed to characterize the skin permeation and tissue disposition of Benzophenone-3 (in ethanol) in rats (groups of 10; 5 males and 5 females per group).<sup>34</sup> The test solution was applied (volume = 100  $\mu$ l; dose = 5 mg/kg [312.5  $\mu$ g/cm<sup>2</sup>]) topically to a 4 cm<sup>2</sup> area on the back, daily, for 30 d. Two negative control groups received topical applications of 0.9% saline and 70% ethanol solution for 30 d. The positive control group received an intraperitoneal (i.p.) dose (25 mg/kg) of acrylamide for 10 d. Tape stripping was used to recover the application dose that permeated into skin layers. Benzophenone was recovered in appreciable amounts from the application sites. Quantifiable amounts of Benzophenone-3 were detected in plasma samples, indicating systemic absorption from the skin. Benzophenone-3 was also detected in the brain and liver (the only tissues collected). The authors noted that Benzophenone-3 primarily undergoes metabolism in the liver and is subsequently excreted in the urine. The elimination half-life of Benzophenone-3 was estimated to be  $7.9 \pm 1.7$  h. Benzophenone-3 was measurable 24 h after skin application, i.e., at the application site and in the plasma, liver, and brain. The authors concluded that the results of this study indicate that Benzophenone-3 penetrated across the skin after a 30-d topical application, and that systemic absorption was correlative among skin, plasma, and tissue samples.

The percutaneous absorption of Benzophenone-3 and its metabolite (Benzophenone-1) was studied using female Sprague-Dawley rats and their offspring.<sup>35</sup> Benzophenone-3 (10% in cream; dose = 100 mg/kg) was administered dermally (shaved skin on back) twice daily to adult female rats during the prenatal period and adulthood. Control female rats were treated with cream without Benzophenone-3. At 21 d after birth, the offspring (male and female) were divided into groups of 5 males and groups of 5 females. From 43 to 56 d old, the test substance was administered dermally to the male offspring. Cream without Benzophenone-3 was applied to control offspring. The calculation of Benzophenone-3 concentrations from the standard calibration curves revealed that the test substance was present in the plasma of treated animals at a concentration of  $215.9 \pm 38.5$  ng/ml. The concentration of Benzophenone-3 in the liver was  $96.81 \pm 17.3$  ng/g wet tissue. Higher concentrations of Benzophenone-1 (main metabolite,  $196.4 \pm 67.5$  ng/g wet tissue) were also detected in the liver. Only the parent compound was detected in the frontal cortex and hippocampus of the brain at concentrations of  $50.6 \pm 11.0$  and  $46.7 \pm 14.4$  ng/g wet tissue, respectively. In male rats, Benzophenone-3 caused neurodegenerative changes in both the frontal cortex and the hippocampus. The authors noted that these values for tissue levels of Benzophenone-3 were reported for animals treated in the study. The data were not reported as female rats versus male offspring. The authors stated that the results of this experiment showed that Benzophenone-3 is absorbed through rat skin and passes through the blood brain barrier.

Benzophenone-3 (10%), at a dose of 100 mg/kg, was applied to the backs of mated Sprague-Dawley rats (number not stated) twice daily.<sup>36</sup> A cream without Benzophenone-3 was applied to control rats. At 21 d after birth, the offspring were weaned and organized into groups of 5 (males separated from females). From 43 to 56 d of age, the female offspring of test animals received dermal applications of Benzophenone-3 (10%). A cream without Benzophenone-3 was applied to control offspring. At 24 h after the last test substance application, the animals were killed, and the brains and livers were excised. In the plasma of all control rats, the concentration of Benzophenone-3 was below the limit of detection. In the plasma of test

animals, Benzophenone-3 was detected in the range of 70 to 220 ng/ml (average = 169 ng/ml). A much higher concentration of the main Benzophenone-3 metabolite, Benzophenone-1, was detected in the liver (156 ng/g wet tissue), when compared to Benzophenone-3 (25 ng/g wet tissue). After dosing with Benzophenone-3, the concentration in the frontal cortex was 26 ng/g and the hippocampus had a concentration of 40 ng/g. Benzophenone-1 was also detected in the frontal cortex and hippocampus. In the control group, the concentration of Benzophenone-3 in the hippocampus was above the detection limit in only one female rat. Benzophenone-3 was not detected in the frontal cortex and liver.

The metabolism and disposition of [<sup>14</sup>C]Benzophenone-3 (formulated in different vehicles) was evaluated using Harlan Sprague-Dawley rats (groups of 5) and B6C3F1/N mice (groups of 5).<sup>37</sup> The vehicles used were as follows: paraffin oil, lotion, coconut oil, ethanol:coconut oil, and ethanol. In rats, a single dose of the test substance (0.1, 1, 10, or 15 mg/kg; dose volume = 0.5 to 1 ml/kg) was administered in most of the vehicles. When the lotion (olive oil:emulsifying wax:water formulation) vehicle was used, the dose volume was ≈ 100 μl. Application (using syringe equipped with needle) was made to an area of skin that was not less than 4 cm<sup>2</sup>. A foam or steel isolator was used to protect the dermal dosing site. In mice, the dose volume was ≈ 2 ml/kg. Urine and feces were collected for up to 72 h. The following results were at 72-h post-dosing. The absorbed dose varied depending on the vehicle. After application of [<sup>14</sup>C]Benzophenone-3 to male rats, the percent dose absorbed in all vehicles was high (64 % to 80%), except in the lotion vehicle where absorption was moderate (46%). The % dose absorbed was similar following application of 0.1 mg/kg (73%) or 10 mg/kg (80%) [<sup>14</sup>C]Benzophenone-3 formulated in paraffin oil. The absorption of [<sup>14</sup>C]Benzophenone-3 was lower in female rats (30%, 15 mg/kg dose) than in male rats (46%, 10 mg/kg dose) after application of [<sup>14</sup>C]Benzophenone-3 in the lotion vehicle. The absorbed dose was excreted mainly via the urine (including cage rinse) (18% to 48%) and feces (15% to 22%), with ~3% to 10% of the absorbed dose remaining in the tissues. Urinary metabolites included Benzophenone-3, Benzophenone-3-glucuronide, Benzophenone-1, Benzophenone-1-glucuronide, and Benzophenone-1-sulfates. Novel minor dihydroxy metabolites, including 2,5-dihydroxy-4-methoxybenzophenone, were also detected.

The distribution of [<sup>14</sup>C]Benzophenone-3 radioactivity in tissues and excreta following dermal application to male mice was similar between the vehicles at 10 mg/kg with the exception of acetone showing higher tissue levels. [<sup>14</sup>C]Benzophenone-3 absorption in female mice following dermal application at 10 mg/kg lotion or 10 mg/kg ethanol was similar to that seen in males. The unabsorbed dose in female mice was ~41%, with the majority of radioactivity recovered in urine and feces at a 10 mg/kg dose in lotion.

## Oral

### Benzophenone-3 and Benzophenone-12

*An absorption study on Benzophenone-3 involving rats, and absorption studies on Benzophenone-12 involving rats and rabbits were performed.<sup>1</sup> When ingested, absorbed benzophenones were primarily conjugated and excreted in the urine, while the unabsorbed material passed out with the feces.*

### Benzophenone-2

A dose-response experiment involving 5 doses (10, 33, 100, 333, or 1000 mg/kg) of Benzophenone-2 was performed using female Sprague-Dawley adult, ovariectomized rats (groups of 5).<sup>38</sup> Doses were administered (by gavage) once per day for 5 d. Blood and urine samples were collected at different time points (every 30 min) after test substance administration. Additionally, the time-dependent metabolism and excretion of Benzophenone-2 were analyzed in a kinetic experiment, for further identification of metabolites. In this kinetic experiment, urine and serum samples were analyzed after *Helix pomatia* glucuronidase/sulfatase (HPG) hydrolysis. Serum concentrations of Benzophenone-2 after dosing ranged from 0.1 μg/ml (after 10 mg/kg dose) to 1.1 μg/ml (after 1000 mg/kg dose). After hydrolysis with HPG, the serum concentrations of total Benzophenone-2 ranged from 1 to 62 μg/ml. Benzophenone-2 was metabolized to glucuronide- and sulfate-conjugates. In the serum, the maximum concentrations of Benzophenone-2, benzophenone-2-glucuronide, and benzophenone-2-sulfate were observed at 30 min post-dosing. The highest concentrations of Benzophenone-2 and its metabolites in the urine were measured at 120 min post-dosing. It was suggested that this biotransformation occurs via a first-pass effect in the gut wall or the liver.

### Benzophenone-3

The toxicokinetics and metabolism of Benzophenone-3 was evaluated using groups of 7 male Sprague-Dawley rats.<sup>39</sup> Benzophenone-3 (in corn oil) was administered orally at a dose of 100 mg/kg (dose volume = 4 ml/kg). Blood samples were collected at various time points up to 24 h after dosing. Benzophenone-3 was converted into Benzophenone-1, which was formed via *o*-demethylation. Benzophenone-1 was subsequently converted to 2,3,4-trihydroxybenzophenone. Benzophenone-3 was also metabolized to 2,2'-dihydroxy-4-methoxybenzophenone, which was formed via the aromatic hydroxylation of Benzophenone-3. After a single oral dose of Benzophenone-3, the toxicokinetics curve showed a peak concentration ( $C_{max}$ ) of  $21.21 \pm 11.61$  μg/ml within 3 h ( $T_{max}$ ), and then declined rapidly. The concentrations of the metabolites in rat blood decreased much more slowly over time, when compared to the parent compound.

Groups (5 animals per group) of mated female Sprague-Dawley rats were fed the following Benzophenone-3 concentrations (in low-phytoestrogen chow) from gestation day (GD) 6 until weaning on postnatal day 23: 1000; 3000;

10,000; 25,000; or 50,000 ppm.<sup>40</sup> Serum concentrations of Benzophenone-3 and its metabolites were measured on GD 10, 15, and 20, and on postnatal day 23. The limit of detection for Benzophenone-3, Benzophenone-1, and Benzophenone-8 was < 0.005 µg/ml. The limit of detection for 2,3,4-trihydroxybenzophenone was < 0.1 µg/ml or 0.05 µg/ml. Both Benzophenone-8 and 2,3,4-trihydroxybenzophenone were below the limits of detection. Therefore, only serum concentrations of Benzophenone-3 and Benzophenone-1 (metabolite) were reported. In the 1000 ppm group, the mean values (on postnatal day 23) for Benzophenone-3 and Benzophenone-1 were  $0.0072 \pm 0.0008$  µg/ml and  $0.0382 \pm 0.0122$  µg/ml, respectively. In the 50,000 ppm group, the mean values (on postnatal day 23) for Benzophenone-3 and Benzophenone-1 were  $0.6886 \pm 0.2447$  µg/ml and  $1.0066 \pm 0.3874$  µg/ml, respectively.

The metabolism and disposition of [<sup>14</sup>C]Benzophenone-3 were evaluated using Harlan Sprague-Dawley rats (groups of 5) and B6C3F1/N mice (groups of 5).<sup>37</sup> A mixture of Benzophenone-3 and [<sup>14</sup>C]Benzophenone-3 (in corn oil) was administered orally (by gavage) at a single target doses of 10, 100, or 500 mg/kg (male mice and rats), and a single target dose of 100 mg/kg (female mice and rats). The dose volume was 5 ml/kg in rats and 10 ml/kg in mice. The animals were killed and the following tissues and organs were collected for analysis: adrenals, brain, lung, heart, spleen, pancreas, kidneys, testes or uterus and ovaries, liver, thyroid, thymus, small intestine, cecum, large intestine, urinary bladder, and adipose and muscle samples. The distribution of radioactivity (at up to 24 h and 72 h) was reported for tissues/organs collectively, and individually for the rat liver and kidney. In male rats, the radioactivity in tissues increased with the increasing dose. In general, the male rat livers had a higher tissue:blood ratio (2.27 to 4.93) when compared to the kidney (1.26 to 3.53) at 72 h post-dosing. Values for total radioactivity in the tissues of male rats at 2 h, 24 h, and 72 h after dosing with 100 mg/kg were 27.5%, 3.1%, and < 0.5%, respectively. These results suggest that Benzophenone-3 was distributed to the tissues, but was not retained in the tissues. No sex differences (rats) in the disposition of [<sup>14</sup>C]Benzophenone-3 following oral administration were apparent. The total dose of [<sup>14</sup>C]Benzophenone-3 recovered in male and female rats was > 94%. After dosing with [<sup>14</sup>C]Benzophenone-3 (100 and 500 mg/kg) in male mice, it was excreted mainly in the urine (40 to 41%, including cage rinse) and feces (24 to 39%) within 72 h. The tissues with the most radioactivity in male mice were the thymus and thyroid in both 100 and 500 mg/kg dose groups. The disposition was similar in female mice 72 h following a single 100 mg/kg gavage administration of [<sup>14</sup>C]Benzophenone-3, with ~34% and ~24% in the urine and feces, respectively. The total radioactivity recovered in the 500 mg/kg dose group for male mice was lower (~69%) than in 100 mg/kg dose groups for male mice (~89%) and female mice (~76%).

Overall, [<sup>14</sup>C]Benzophenone-3 was well absorbed and excreted mainly in the urine (39% to 57%) and feces (24 % to 42%) in male and female rats and mice. The distribution of Benzophenone-3 in tissues was minimal in rats (0.36%) and mice (< 0.55%). In male and female rats and mice, urinary metabolites included Benzophenone-3, Benzophenone-3-glucuronide, Benzophenone-1, Benzophenone-1-glucuronide, and Benzophenone-1-sulfates. Novel minor dihydroxy metabolites, including 2,5-dihydroxy-4-methoxybenzophenone, were also detected.

### Benzophenone-12

Groups of 6 male rats (Carworth Farms Elias strain) were fed Benzophenone-12 at dietary concentrations of 1.25% and 5% daily for 35 d, in accordance with Organization for Economic Co-operation and Development (OECD) Test Guideline (TG) 417.<sup>5</sup> Results indicated that Benzophenone-12 had low absorption after oral feeding. The daily recovery of unchanged material from the feces was ~90%. The conjugation and urinary excretion of the test substance (metabolized to glucuronide conjugate) in rats fed both dietary levels was ~10% of the dose over the 35-d test period. The authors concluded that Benzophenone-12 did not have any bioaccumulation potential in this study.

## **Human**

### **Dermal**

#### Benzophenone-3

Solid-phase microextraction, combined with gas chromatography-quadrupole ion trap mass spectrometry, was used to identify Benzophenone-3 and its metabolites in human urine.<sup>41</sup> A urine specimen was collected from a subject after a sunscreen containing Benzophenone-3 (~ 8 ml) was applied topically to the body. The results indicated the presence of Benzophenone-3 and its metabolite, 2,4-dihydroxybenzophenone.

Eleven subjects applied a sun protecting lotion containing 4% Benzophenone-3 (40 g for average body area of 2 m<sup>2</sup>).<sup>42</sup> The lotion was applied to most of the body, and the subjects were instructed to shower only once (i.e., after 12 h during the 48-h period). During the 48 h after application, urine samples were collected. The data indicated that application of the lotion resulted in excretion of Benzophenone-3 for as long as 48 h post-application. The average total amount of Benzophenone-3 excreted was 11 mg (median = 9.8 mg), which is approximately 0.4% of the amount applied.

The systemic absorption of Benzophenone-3 was evaluated in a 2-wk, single-blinded study involving 32 healthy volunteers (15 males, 17 postmenopausal females).<sup>43</sup> The subjects served as their own control. During the first week, a basic cream formulation without Benzophenone-3 was applied topically (whole-body application, 2 mg per cm<sup>2</sup>) daily for 4 d. This dose corresponded to 40 g for an average body area of 2 m<sup>2</sup>. The protocol for the second week was the same, and involved topical application of 10% Benzophenone (in cream). Benzophenone-3 was absorbed through the skin and detected

in the urine. The maximum concentration of Benzophenone-3 in the urine was 200 ng/ml in women (at 3 to 4 h after application) and 300 ng/ml in men (at 3 h after application). Results from this study also indicated that serum follicle stimulating hormone (FSH) and luteinizing hormone (LH) in both men and women were unchanged, but statistically significant differences in testosterone levels (decreased) were observed in men and women during the 2 wk study. Minor differences in serum 17- $\beta$ -estradiol (E2) and inhibin B levels were observed in men only. It was determined that the differences in hormone levels observed were unrelated to Benzophenone-3 exposure.

Twenty-five subjects applied a sunscreen containing Benzophenone-3 (4%), morning and night, for 5 d.<sup>44</sup> The 25 subjects were randomly divided into 2 groups (Groups A and B). The sunscreen was applied to most of the body (in both groups), and the subjects were allowed to shower once per day (prior to next application). Unlike Group A, the application sites of Group B subjects were irradiated after test substance application (time varied between 9 h and 15 h). From days 1 to 5, the UVA doses ranged from 60 J/cm<sup>2</sup> to 100 J/cm<sup>2</sup>. The 60 J/cm<sup>2</sup> irradiation was for 34 min and 17 min on each side of the body. The total dose of UVA varied among participants, i.e., between 400 and 707 J/cm<sup>2</sup>. For UVB irradiation, the sites of subjects were irradiated according to Fitzpatrick skin type (types I to III). The UVB dose was ~ 195 mJ/cm<sup>2</sup> for 90 s, and the total UVB dose varied among participants from 0.46 to 2 J/cm<sup>2</sup>. In both groups, urine samples were obtained daily for 5 d and for 5 d after the last application. After 10 d, the subjects excreted 1.2% to 8.7% (mean = 3.7%) of the total amount of Benzophenone-3 applied, and there was no statistically significant difference between the 2 groups. The authors concluded that a large amount of Benzophenone-3 was absorbed, and that Benzophenone-3 accumulated in the body as the subjects excreted Benzophenone-3 five d after the last application.

A sunscreen cream containing Benzophenone-3 was applied (2 mg/cm<sup>2</sup>) to 32 subjects (15 males and 17 females), and this amount corresponded to 40 g over an average body area of 2 m<sup>2</sup>.<sup>45</sup> Application of the sunscreen formulation was described as a daily whole-body topical application of 10% (w/w) Benzophenone-3 for 4 d. Showering, bathing, and swimming were not allowed until 4 h after the daily application. Blood concentrations were measured at 0, 1, 2, 3, 4, 24, and 96 h. Urine concentrations were measured at 0, 24, 48, 72, and 96 h. Prior to the first application, the sunscreen was not detected in the plasma or urine. The maximum median plasma concentration of Benzophenone-3 was 187 ng/ml in females, and 238 ng/ml in males. The level of Benzophenone-3 in the urine of females was 44 ng/ml, and was 81 ng/ml in the urine of males.

Serum samples were obtained from 2 volunteers after topical application of a sunscreen cream containing 5% Benzophenone-3.<sup>46</sup> The cream (20 g) was applied to 1 volunteer, and the other volunteer received a 30 g application. Each volunteer applied the cream all over the body. Blood samples were collected before and after application at different time intervals for a period of 24 h. After application, the amount of Benzophenone-3 in the serum increased significantly and reached a maximum concentration ranging between 6 h (200  $\mu$ g/l, after 20 g dose) and 9 h (304  $\mu$ g/l, after 30 g dose). The amount of Benzophenone-3 in the serum then decreased slowly. At 24 h after cream application, high amounts of Benzophenone-3 were present in the serum (84  $\mu$ g/l, after 20 g dose; 206  $\mu$ g/l after 30 g dose). Formation of the Benzophenone-8 metabolite occurred at a very small extent. The Benzophenone-1 metabolite was detectable from the first hour after cream application, and the increase was slightly more pronounced during the first 6 h. At 24 h post-application, the amount of Benzophenone-1 in the serum was 34  $\mu$ g/l (after 20 g dose) and 102  $\mu$ g/l (after 30 g dose).

A dermal absorption study on a sunscreen containing 5% Benzophenone-3 was performed using 9 adult subjects.<sup>47</sup> The sunscreen was applied (8 g) to the skin (arms and legs) using a glue bottle with a cotton gauze head. Urine was collected within the next 12 h after application. Urine samples were mixed with acetate buffer solution containing  $\beta$ -glucuronidase. Using HPLC, Benzophenone-3 and the following 3 metabolites were detected in the urine: Benzophenone-1; 2,3,4-trihydroxybenzophenone; and 2,2'-dihydroxymethoxybenzophenone. The limits of detection for Benzophenone-3 and its metabolites were 0.5 to 1  $\mu$ g/ml in urine sample solution and, except for the baseline samples, the concentrations in all samples were far above the limits.

A study was performed to determine whether active sunscreen ingredients are absorbed into the systemic circulation.<sup>48</sup> The study involved groups of 6 subjects (1 group per product). Study participants were enrolled from July to August of 2018. None of the participants were using any of the sunscreen products tested in the study or products containing any of the listed active ingredients. The sunscreen formulations containing Benzophenone-3 applied were: spray product #1 (6% Benzophenone-3), spray product #2 (5% Benzophenone-3), and lotion (4% Benzophenone-3). Each product was applied (2 mg/cm<sup>2</sup>) to 75% of the body surface area 4 times per day for 4 d. The subjects remained in the clinic for up to 7 d, during which time they were not exposed to direct sunlight. In each group, 30 blood samples per person were collected over 7 d. The application of each product containing Benzophenone-3 resulted in plasma Benzophenone-3 concentrations that exceeded 20 ng/ml on day 7. For all participants, plasma concentrations exceeded 0.5 ng/ml within 2 h after a single application on day 1. Geometric mean maximum plasma concentrations of Benzophenone-3 reported following product application were as follows: 209.6 ng/ml (for 6% Benzophenone spray product), 194.9 ng/ml (for 5% Benzophenone-3 spray product), and 169.3 ng/ml (for 4% Benzophenone-3 lotion). The relationship between recent, self-reported personal care product use and ingredient (Benzophenone-3 included) concentrations in the urine was evaluated in 100 adolescent girls.<sup>49</sup> Study participants were recruited in May to July of 2013. The use of sunscreen was associated with 57.8% higher urinary concentrations of Benzophenone-3.

The systemic absorption and pharmacokinetics of Benzophenone-3 in sunscreen products were studied using 38 healthy participants.<sup>50</sup> The study was conducted between January and February of 2019. The protocol and product types were similar to that in the preceding study. Product application was described as 2 mg/cm<sup>2</sup> to 75% of the body surface area at 0 h on day 1, and 4 times on day 2 through day 4 at 2-h intervals. Thirty-four blood samples were collected from each participant over 21 d. The maximum plasma concentrations of Benzophenone-3 were 258.1 ng/ml (from 4% Benzophenone-3 sunscreen lotion) and 180.1 ng/ml (from 6% Benzophenone-3 aerosol spray). The authors concluded that Benzophenone-3 was systemically absorbed.

The dermal uptake of Benzophenone-3 from clothing was studied using 3 subjects.<sup>51</sup> Cotton shirts (purchased in May of 2016) were exposed to Benzophenone-3 at an elevated concentration (final concentration = 4.4 µg/m<sup>3</sup> for 32 d). The 3 subjects wore the exposed shirts for 3 h. After the exposure period, they wore their usual clothing during the collection of urine samples for 48 h. The rate of urinary excretion of the sum of Benzophenone-3 and Benzophenone-1 (metabolite of Benzophenone-3) increased for all 3 subjects during and following the 3-h exposure. The summed mass of Benzophenone-1 and Benzophenone-3 that was excreted during the first 24 h (attributable to wearing the exposed t-shirts) were 12, 9.9, and 82 µg for the first, second, and third participant, respectively. The authors noted that the analysis of these results, taken together with predictions of steady-state models, suggest that dermal uptake of Benzophenone-3 from clothing could meaningfully contribute to overall body burden.

Benzophenone-3 absorption (over a 4-h period) after application of a sunscreen containing 6% Benzophenone-3 was calculated.<sup>52</sup> The calculation appears below:

$$60 \text{ g (amount of product applied/4h)} \times 0.06 \text{ (6\% Benzophenone-3 in product)} / 75 \text{ kg (average weight of women)} = 0.048 \text{ g/kg or } 48 \text{ mg/kg or } 48 \text{ ppm/exposure}$$

$$48 \text{ ppm/exposure} \times 0.08 \text{ (8\% Benzophenone-3 absorbed topically)} = 3.84 \text{ ppm or } 3840 \text{ ppb absorbed over } 4 \text{ h (i.e., 1 day's exposure).}$$

The ratio of fetal to maternal blood levels after just 2 applications over a 4-h period of the sunscreen was 384 ppb/3840 ppb (at 10% fetal exposure) and 2880 ppb/3840 ppb (at 75% fetal exposure).

### Biomonitoring Studies

Details relating to the following biomonitoring study summaries are presented in Table 5.

#### Human

##### *Benzophenone-1, Benzophenone-2, and Benzophenone-3*

Benzophenone-1, Benzophenone-2, Benzophenone-3, and 4-hydroxybenzophenone (metabolite of Benzophenone-1 and Benzophenone-3) were detected in urine samples obtained from 20 male subjects.<sup>53</sup> The authors noted that there seemed to have been a relationship between the presence of Benzophenone-3 and Benzophenone-1 because, in all samples in which Benzophenone-3 was present, Benzophenone-1 was also present. Furthermore, they noted that this observation is suggestive of the possible conversion of Benzophenone-3 to Benzophenone-1 and that the content of Benzophenone-1 may be due to human metabolism to and not direct exposure. Spot urine samples (157 total) obtained from a segment of the general German population (59 females, 39 males, and 59 children) were analyzed.<sup>54</sup> Benzophenone-1 and Benzophenone-3 had high detection rates (26%). A study was performed to investigate the exposure of human embryos and fetuses to UV filters.<sup>55</sup> Placentas (12) from volunteer mothers in Spain were collected at delivery. Benzophenone-1 was detected in all samples. 4-Hydroxybenzophenone, metabolite of Benzophenone-1 and Benzophenone-3, was detected in 3 of the 12 placental samples. Urinary concentrations of benzophenones were measured in 34 Tunisian women.<sup>56</sup> Benzophenone-1 and Benzophenone-3 were found in 91.2% and 64.7% of the analyzed samples, respectively.

Benzophenone-1 and Benzophenone-3 were detected in the urine of reproductive-aged women.<sup>57</sup> A total of 143 women provided 509 spot urine samples collected across 2 months of study (3 to 5 samples per woman). Geometric mean urinary concentrations of Benzophenone-3 and Benzophenone-1 were 4.3 µg/l and 3.3 µg/l, respectively. A prospective study involving 200 pregnant women was performed.<sup>58</sup> The women appeared to have been most exposed to Benzophenone-3. The following benzophenones were all detectable in amniotic fluid and cord blood, and, except for 4-hydroxybenzophenone, also in fetal blood: Benzophenone-1, Benzophenone-3, 4-methylbenzophenone, and 4-hydroxybenzophenone. Benzophenone-1 and Benzophenone-3 were only detectable in the fetal circulation in cases of high maternal exposure. 4-Methoxybenzophenone appeared to pass into fetal and cord blood more freely.

##### *Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-4, Benzophenone-6, and Benzophenone-8*

Urinary concentrations of the following benzophenone derivatives were evaluated in a national sample of the South Korean population (1576 subjects): Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-4, Benzophenone-8, and 4-hydroxybenzophenone.<sup>59</sup> The detection rates for Benzophenone-1 and 4-hydroxybenzophenone were 56% and 88%, respectively. The detection rate for the following benzophenones was below 25%: Benzophenone-2, Benzophenone-3, Benzophenone-4, and Benzophenone-8. Benzophenones have been identified in human menstrual blood of 25 subjects in



Southern Spain.<sup>60</sup> Benzophenone-3 was detected most frequently (in 24 of 25 subjects), followed by Benzophenone-6 (in 17 of 25 subjects), and Benzophenone-1 (in 11 of 25 subjects). A study with data on benzophenones in the urine was performed using 441 adult pre-menopausal females in South Korea.<sup>61</sup> The detection frequencies of benzophenones in urine samples were: Benzophenone-1 (98.4%), Benzophenone-3 (74.6%), and Benzophenone-8 (22.9%).

#### Benzophenone-1 and Benzophenone-3

The presence of UV filters in semen, serum, and the urine was studied using 300 men.<sup>62</sup> Only 6 of the men had used sunscreen during the 48 h preceding sample collection. Benzophenone-1 and Benzophenone-3 were detected in 19% and 27% of the seminal fluid samples, respectively.

#### Benzophenone-3

Urine samples (166 total) were collected from children and adults in the US and China.<sup>63</sup> Benzophenone-3 was detected in practically all urine samples. The concentrations of Benzophenone-3 in children (geometric mean = 9.97 ng/ml) and adults (geometric mean: 15.7 ng/ml) from the US were statistically significantly higher when compared to children (geometric mean = 0.622 ng/ml) and adults (geometric mean = 0.099 ng/ml) from China. The urinary excretion of ingredients in personal care products over a 6-d period was studied using 8 subjects.<sup>64</sup> A total of 352 individual urine samples was collected over a 6-d period. Benzophenone-3 was frequently detected, i.e., in 70% of the total urine samples. Human adipose fat samples were collected from 20 subjects.<sup>65</sup> High concentrations of Benzophenone-3 (maximum of 4940 ng/g wet weight) were detected. Postmortem brain material (hypothalamus and white-matter tissue) obtained from up to 24 individuals was analyzed for the presence of Benzophenone-3.<sup>66</sup> In the hypothalamus, the mean amount (n = 24) of Benzophenone-3 was below the limit of detection. In the white-matter, the mean amount (n = 10) of Benzophenone was 0.32 ng/g. A study on human UV filters in human breast milk was performed, and involved 79 breast milk samples from mothers in Spain.<sup>67</sup> The percentage of samples that contained UV filters was 24%, and two of the major contributors were Benzophenone-3 (779.9 ng/g milk) and its metabolite, 4,4'-dihydroxybenzophenone (73.3 ng/g milk). Concentrations of UV filters in breast tissue (3 serial locations within) from 40 women undergoing mastectomy for breast cancer were measured.<sup>68</sup> Benzophenone-3 was measured in 83 of 120 (69%) tissue samples and at least 1 breast region for 33 of 40 women (range: 0 to 26 ng/g tissue).

## TOXICOLOGICAL STUDIES

### **Acute Toxicity Studies**

Acute toxicity studies summarized below are described in Table 6. (Data from the previous benzophenones reports are not included in the table.)

#### **Dermal**

*In studies on Benzophenones-3, -4, -8, and -12 involving rabbits, there was no toxicity at doses of 5 g/kg and greater.<sup>1</sup> The highest dose administered in these studies was 16 g/kg.*

A sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated for dermal toxicity in a study involving 24 Wistar albino rats (12 males, 12 females).<sup>69</sup> The authors concluded that the acute dermal LD<sub>50</sub> of the sunscreen formulation was greater than 2000 mg/kg in male and female rats. The same sunscreen formulation (0.6% to 0.9% Benzophenone-3) was applied to the skin of 6 male New Zealand rabbits.<sup>69</sup> Systemic toxicity was not observed. The acute dermal toxicity of Benzophenone-12 was evaluated using 5 albino rabbits.<sup>5</sup> The LD<sub>50</sub> was > 10,000 mg/kg.

#### **Oral**

*Benzophenones-1, -2, -3, -4, -6, -8, -9, -11, and -12 were practically nontoxic to slightly toxic (Benzophenones-2, -4, and -11) when administered orally to rats at doses up to 16 g/kg.<sup>1</sup> Benzophenone-4 was evaluated for acute oral toxicity using 20 rats (strain not stated).<sup>1</sup> Doses of the test substance (in agar/tween) ranging from 1250 to 10,000 mg/kg were administered orally by gavage. Dosing was followed by a 7- to 14-d observation period. Clinical signs (ataxia) were observed. An LD<sub>50</sub> of 3530 mg/kg was reported.*

The acute oral toxicity of Benzophenone-1 was evaluated using rats (number and strain not stated).<sup>6</sup> The LD<sub>50</sub> was 8600 mg/kg. The acute oral toxicity of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated using 10 female Wistar albino rats.<sup>69</sup> The LD<sub>50</sub> for the sunscreen formulation was > 2000 mg/kg. The acute oral toxicity of Benzophenone-8 was evaluated using 6 female Wistar rats of the CLR:(WI) strain.<sup>8</sup> The LD<sub>50</sub> was > 2000 mg/kg. Benzophenone-12 (20% suspension) was evaluated for acute oral toxicity using 10 male rats of the CF Nelson strain.<sup>5</sup> The LD<sub>50</sub> was > 10,000 mg/kg.

### **Short-Term Toxicity Studies**

Repeated dose toxicity studies (short-term and subchronic toxicity) summarized below are described in Table 7. (Data from the previous benzophenones reports are not included in the table.)

## Dermal

In a 2-wk dermal toxicity study, B6C3F<sub>1</sub> mice (5 males and 5 females per group) received topical applications in amounts of 0.5 to 8 mg of Benzophenone-3 in an acetone or lotion vehicle.<sup>70</sup> The only effects noted were minimal, variable increases in liver and kidney weights. In another 2-wk dermal toxicity study, F344/N rats (5 males and 5 females per group) received topical applications of 1.25 to 20 mg of Benzophenone-3 in an acetone or lotion vehicle.<sup>70</sup> The only effects noted were small and variable increases in liver and kidney weights. Benzophenone-3 (in ointment base) was applied to the skin of male Sprague-Dawley rats (groups of 4 to 6 animals; weights = 300 g) at a dose of 100 mg/kg, twice daily for 4 wk.<sup>71</sup> The results of this study suggest that Benzophenone-3 is not toxic to rats when applied dermally at a dose of 100 mg/kg for 4 wk. The short-term dermal toxicity of Benzophenone-3 was studied using female Sprague-Dawley rats and their offspring.<sup>35</sup> Benzophenone-3 (10% in cream; dose = 100 mg/kg) was administered dermally (shaved skin on back) twice daily to adult female rats from the first to the last day of pregnancy (~22 to 23 days). At 21 d after birth, the offspring (male and female) were divided into groups of 5 males and groups of 5 females. From 43 to 56 d, the test substance was administered dermally to the male offspring. The dosing of adult pregnant females did not significantly alter their body weight (bw) or cause any apparent adverse effects, when compared to control rats. No significant differences in bw and sex-ratio were observed in the offspring.

## Oral

*When rats were fed Benzophenone-3 at concentrations up to 1% in the diet for 27 d, no toxic effects were observed.<sup>1</sup> A no-effect-level of 2.5% was reported in a study in which rats were fed Benzophenone-8 in the diet at concentrations up to 10% for 36 d. Groups of mice received Benzophenone-8 (in corn oil, 50 to 5000 mg/kg) by gavage daily for 2 d.<sup>2</sup> No toxic signs or deaths were observed after dosing with 50 mg/kg. Signs of toxicity were observed at doses of 166 to 5000 mg/kg. At doses of 1666.6 and 5000 mg/kg, abnormal gait and a very low mortality incidence were reported. In another experiment, groups of mice were dosed, by gavage, with 1500 mg/kg Benzophenone-8 (2 doses, 24 h apart). Body drop, decreased activity, and abnormal gait were observed.*

The subchronic oral toxicity of Benzophenone-1 was evaluated in a 90-d study involving male and female rats (number and strain not stated).<sup>6</sup> The NOAEL was 236 ppm/d. In a 2-wk oral toxicity study, B6C3F<sub>1</sub> mice (5 males and 5 females per group) received feed containing 0, 3125, 6250, 12,500, 25,000, or 50,000 ppm Benzophenone-3.<sup>70</sup> The no-observed-adverse-effect level (NOAEL) for microscopic lesions was 6250 ppm Benzophenone-3 in the diet for mice. There was a dose-related increase in liver weight associated with hepatocyte cytoplasmic vacuolization, up to and including the highest dietary concentration. In another 2-wk oral toxicity study, F344/N rats (5 males and 5 females per group) received diets containing 0, 3125, 6250, 12,500, 25,000, or 50,000 ppm Benzophenone-3.<sup>70</sup> The NOAEL for microscopic lesions was 6250 ppm Benzophenone-3 in the diet for rats. Liver and kidney weights were increased in dosed rats. Enlarged livers were associated with a marked hepatocyte cytoplasmic vacuolization in rats received diets containing ≥ 6250 ppm. Renal lesions consisting of dilated tubules and regeneration of tubular epithelial cells were observed primarily in high dose rats.

In a 13-wk oral toxicity study, B6C3F<sub>1</sub> mice (10 males and 10 females per group) received feed containing 0, 3125, 6250, 12,500, 25,000, or 50,000 ppm Benzophenone-3.<sup>70</sup> The NOAEL for microscopic lesions was 6250 ppm Benzophenone-3 in the diet for mice. Mild increases in liver weights were observed in mice of both sexes, and kidney weights were increased variably in dosed females. Microscopic lesions were observed only in the kidneys of male mice that received 50,000 ppm. In another 13-wk oral toxicity study, F344/N rats (10 males and 10 females per group) received diets containing 0, 3125, 6250, 12,500, 25,000, or 50,000 ppm Benzophenone-3.<sup>70</sup> The NOAEL for microscopic lesions was 6250 ppm Benzophenone-3 in the diet for rats. Liver and kidney weights were increased in dosed rats. Kidney lesions progressed to include papillary degeneration or necrosis. The liver lesion appeared to regress; liver enzymes in serum remained elevated. Results on subchronic oral toxicity are included in an NTP oral carcinogenicity study on Benzophenone-3 involving male and female Sprague-Dawley rats.<sup>72</sup> Groups of 10 male and 10 female rats were exposed to 0 or 10,000 ppm Benzophenone-3 in the diet for 14 wk. In males, the absolute and relative liver and right kidney weights were increased in the 10,000 ppm group compared to the control group. In females, the absolute kidney weight was significantly decreased, and the relative liver weight was significantly increased relative to the control group.

A short-term oral toxicity study on Benzophenone-4 was performed using groups of 26 Wistar rats (13 males, 13 females/group).<sup>7</sup> The test substance was administered orally (in corn oil, by gavage) at doses of 750, 1000, and 1250 ppm/d. Male rats were treated 2 wk before mating and thereafter for a total of 48 dosing days. Female rats were treated 2 wk before mating, and during mating, gestation, and lactation, for a total of approximately 63 d of dosing. The NOAEL (systemic toxicity) for Benzophenone-4 in this study was established at 1250 mg/kg/d for male and female rats. Groups of 6 male rats (Carworth Farms Elias strain) were fed Benzophenone-12 at dietary concentrations of 1.25% and 5% daily for 35 d, in accordance with OECD TG 417.<sup>5</sup> There were no lesions of the liver or kidneys at histological examination. The repeated dose toxicity of Benzophenone-12 was evaluated in Wistar rats.<sup>5</sup> The test substance (in 0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80) was administered by gavage to groups of Wistar rats (F<sub>0</sub> animals: 12 males, 12 females/group) at doses of 100, 300, and 1000 ppm/d. The duration of treatment was described as follows: 10-wk pre-mating period (males), 2-wk pre-mating period (females), 2-wk mating period (both sexes), ~2 d post-mating (males), entire gestation period, up to 30 d of lactation (corresponding to 21 d of lactation and up to 9 d post-weaning), and 35 d post-

mating (for sperm-negative females). Pups from the F<sub>1</sub> litter were selected (F<sub>1</sub> rearing animals) for specific post-weaning examinations. A NOAEL of 1000 ppm/d for general, systemic toxicity was determined. (Developmental and reproductive toxicity data are included in that section of this safety assessment.)

### **Subchronic Toxicity Studies**

#### **Oral**

*In subchronic (90-d) oral toxicity studies, Benzophenones-3 and -12, at 1% and 1.8% in the diet, respectively, were nontoxic to rats.<sup>1</sup> Benzophenones-1 and -12 elicited toxic effects (liver and kidney lesions) in rats at 0.6 and 1.9 g/kg, respectively, when fed for 90 d. In the same time period, Benzophenone-3, fed at 0.5% in the diet, and Benzophenone-8, fed at 5%, produced toxic effects (degenerative nephrosis). In a 120-d feeding study, Benzophenone-12 was nontoxic to dogs at a concentration of 0.6% in the diet.*

### **DEVELOPMENTAL AND REPRODUCTIVE TOXICITY STUDIES**

Developmental and reproductive toxicity studies summarized below are described in Table 8.

#### **Embryo/Ovary Cultures**

The embryotoxicity of Benzophenone-3 was evaluated in the fish embryotoxicity test using zebrafish embryos.<sup>73</sup> The applied number of zebrafish embryos was 40 at each concentration in 4 replicates. The experiment was continued until 120 h post-fertilization. The range of Benzophenone-3 (in dimethyl sulfoxide (DMSO)) concentrations tested was 0.438 µM to 116 µM. Benzophenone-3 decreased the number of hatched embryos after 96 h post-fertilization. The EC<sub>50</sub> value was 54.3 µM. Other malformations were observed, but their frequency was not concentration-dependent. These included pericardial and yolk sac edema, deformed jaw and ventricle or dilated gut, and jaw deformity. The effect of Benzophenone-3 on follicular assembly was studied using whole ovary cultures collected from Wistar rats.<sup>74</sup> Ovaries (n = 120) were collected from rats at birth (postnatal day 0). Pups from the same litters were randomly assigned to different treatment groups so that each group contained ovaries of different pups from different litters. The ovary cultures were treated for 7 d with the following Benzophenone-3 concentrations (in (DMSO): 0.0058 µM, 0.276 µM, 0.576 µM, and 0.876 µM. Even at the lowest concentration of Benzophenone-3 (0.0058 µM), stimulation of the process of germ cell nest breakdown and a decrease in the reserve of total oocytes were observed.

#### **Animal**

##### **Derma**

In a 13-wk dermal dosing study, B6C3F<sub>1</sub> mice (10 males and 10 females per group) received topical doses of 22.75 to 364 mg/kg Benzophenone-3 in acetone.<sup>75</sup> Epididymal sperm density was decreased (whether or not statistically significant not stated) at all 3 dose levels evaluated (22.75, 91.0, and 364.0 mg/kg). In female mice, there was no significant difference in estrous cycle length between the control group and each dose group. A study was performed to analyze whether dermal exposure to Benzophenone-3 during pregnancy affects the outcome of a second pregnancy in mice.<sup>76</sup> Pregnant mice (number not stated) were exposed dermally to Benzophenone-3 (50 mg/kg/d) from GD 0 to 6. Dermal exposure to Benzophenone-3 during early pregnancy resulted in an intrauterine growth restriction (IUGR) phenotype, disturbed sex ratio, and alterations in the growth curve of the offspring in the mouse model.

##### **Oral**

The reproductive toxicity of Benzophenone-1 was evaluated using female rats (number and strain not stated).<sup>6</sup> The test substance was administered orally for 3 d. A NOAEL of 100 mg/kg/d was reported. The developmental toxicity of Benzophenone-2 (in 10% ethanol/90% corn oil vehicle) was evaluated using groups of 5 timed pregnant C57BL/6NCR mice.<sup>77</sup> Benzophenone-2 (6.25 mg) was administered via gavage on GD 12 through 17. In the test group, 8 of 57 male fetuses had hypospadias (p = 0.0064, when compared to controls). The co-administration of Benzophenone-2 with an estrogen receptor antagonist (10 µg in vehicle (subcutaneously (s.c.)) during gestation, yielded normal genital tubercles; i.e., no hypospadias in 26 of 26 mice. The authors concluded that Benzophenone-2 may cause hypospadias via signaling through the estrogen receptor. Benzophenone-3 (administered in feed) was tested for its effects on fertility and reproduction in Swiss CD-1 mice, according to the continuous breeding protocol.<sup>78</sup> Based on the results of a dose-finding study, 1.25%, 2.5%, and 5.0% (w/w) were chosen to investigate effects on fertility and reproduction. Male and female mice were continuously exposed for a 7-d pre-cohabitation and a 98-d cohabitation period. In the 2.5% and 5.0% dose groups, feed consumption was consistently higher, but F<sub>0</sub> bw were consistently lower. The authors noted that these findings suggest that Benzophenone-3 may have been adversely affecting metabolism or the digestive process. It was concluded that Benzophenone-3 caused systemic toxicity, but had minimal effects on fertility and reproduction. In a 13-wk oral dosing study, B6C3F<sub>1</sub> mice (10 males and 10 females per group) received feed containing 0, 3125, 6250, 12,500, 25,000, or 50,000 mg/kg Benzophenone-3.<sup>70</sup> Mice in the highest dose group (50,000 mg/kg in feed) exhibited a decrease in epididymal sperm density and an increase in length of the estrous cycle.

The effects of oral exposure to Benzophenone-3 on growth and morphology of the mammary gland and anogenital distance was evaluated using 3 groups of mated BALB/c female mice.<sup>79</sup> From pregnancy day 0 until the day before weaning

(lactational day 21), the females were dosed orally with Benzophenone-3 (in tocopherol-stripped corn oil). The following doses were administered: 0.03 mg/kg/d, 0.212 mg/kg/d, and 3 mg/kg/d. In males, the anogenital index was reduced after exposure to 30 and 212 µg/kg/d at postnatal day 21 and in puberty. In adult males, no differences in anogenital distance were observed. In females, the anogenital index was unaffected at postnatal day 21, but decreased (at 212 µg/kg/d) when measured at puberty. No effects on female anogenital index were observed in adulthood. In a 13-wk oral dosing study, F344/N rats (10 males and 10 females per group) received diets containing 0, 3125, 6250, 12,500, 25,000, or 50,000 mg/kg Benzophenone-3.<sup>70</sup> Rats receiving a diet with 50,000 ppm Benzophenone-3 showed markedly lower epididymal sperm density and an increase in the length of the estrous cycle at the end of the study. A study was performed to determine the effects of maternal and lactational exposure to Benzophenone-3 on the development of offspring.<sup>40</sup> Groups (7 to 8 animals per group) of mated female Sprague-Dawley rats were fed the following Benzophenone-3 concentrations (in low-phytoestrogen chow) from GD 6 until weaning on postnatal day 23: 1000; 3000; 10,000; 25,000; or 50,000 mg/kg. There were no statistically significant differences in the mean number of implantation sites/litter, mean resorptions per litter, % litters with resorptions, number and weights of live fetuses, or sex ratios between the control and Benzophenone-3 dose groups.

Groups of 25 pregnant Sprague-Dawley rats were fed low-phytoestrogen chow containing 3000 or 30,000 mg/kg Benzophenone-3 from GD 6 until postnatal day 21.<sup>80</sup> The male offspring evaluated in this study were weaned on postnatal day 28, and then dosed with the same concentrations of Benzophenone-3 (in chow and milk). The animals were killed on postnatal day 30. Rats exposed perinatally to 30,000 ppm Benzophenone-3 had statistically significantly lower weights of the paired-testis, paired-epididymis, and prostate. Results relating to developmental toxicity are included in an NTP oral carcinogenicity study on Benzophenone-3 involving male and female Sprague-Dawley rats.<sup>72</sup> On GD 6, groups of 42, 35, 35, and 43 F<sub>0</sub> time-mated female rats were fed diets containing 0, 1000, 3000, and 10,000 ppm Benzophenone-3, respectively, for 39 d. Dietary concentrations of 1000, 3000, and 10,000 ppm Benzophenone-3 resulted in average daily doses of approximately 70, 206, and 660 mg Benzophenone-3/kg bw/d during gestation, and 157, 478, and 1609 mg/kg/d over lactation days 1 – 14. Groups of 50 (1000 and 3000 ppm) or 60 (0 and 10,000 ppm) F<sub>1</sub> rats per sex continued on study after weaning, and were fed diets containing the same exposure concentrations for 105 wk; 10 F<sub>1</sub> rats per sex from the 0 and 10,000 ppm groups were evaluated at 14 wk. The administration of Benzophenone-3 had no effects on the percentage of mated females producing pups, litter size, pup sex distribution, or numbers of male or female pups. Benzophenone-3 was evaluated for developmental toxicity in accordance with OECD TG 414, using groups of 25 mated Wistar rats of the CrI:WI (Han) strain.<sup>9</sup> Benzophenone-3 (in corn oil) was administered at doses of 40, 200, and 1000 mg/kg/d (once daily, by gavage) on days 6 through 19 post-coitum. The NOAEL for Benzophenone-3 was 200 mg/kg/d. In a study involving groups of 26 Wistar rats (13 males, 13 females/group), Benzophenone-4 was administered orally (in corn oil, by gavage) at doses of 750, 1000, and 1250 mg/kg/d.<sup>7</sup> Male rats were treated 2 wk before mating and thereafter for a total of 48 d of dosing. Female rats were treated 2 wk before mating, during mating, during gestation and during lactation, for a total of approximately 63 d of dosing. The NOAEL (reproductive toxicity) for Benzophenone-4 in this study was established at 1250 mg/kg/d.

The developmental toxicity of Benzophenone-12 (in 0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80) was evaluated using groups of 50 Wistar rats (25 males for mating, 25 females).<sup>5</sup> The test substance was administered by gavage to mated females at doses of 100, 300, and 1000 mg/kg/d. The groups were dosed daily, from implantation to one day prior to the expected day of parturition (GD 6 to 19). The NOAEL for maternal and prenatal developmental toxicity was 1000 mg/kg/d. Benzophenone-12 (in 0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80) was administered by gavage to groups of Wistar rats (F<sub>0</sub> animals: 12 males, 12 females/group) at doses of 100, 300, and 1000 mg/kg/d.<sup>5</sup> The duration of treatment was described as follows: 10-wk pre-mating period (males), 2-wk pre-mating period (females), 2-wk mating period (both sexes), ~2 d post-mating (males), entire gestation period, 21 d of lactation and up to 9 d post-weaning, and 35 d post-mating (for sperm-negative females). The NOAEL for reproductive performance and fertility of the F<sub>0</sub> parental rats and developmental toxicity in the offspring was 1000 mg/kg/d.

## GENOTOXICITY STUDIES

Genotoxicity studies (in vitro and in vivo) summarized below are described in Table 9. (Data from the previous benzophenones reports are not included in the table.)

### In Vitro

*Benzophenone-2 (up to 10,000 µg/plate), Benzophenone-6 (up to 1000 µg/plate), and Benzophenone-8 (up to 700 µg/plate) were reported to be weakly mutagenic with metabolic activation in the Ames test.<sup>1</sup> Benzophenones-6 and -8 were mutagenic in one of the Salmonella typhimurium strains (TA1537) tested. Benzophenone-2 was weakly mutagenic in the mouse lymphoma forward mutation assay (at doses of 24 and 32 µg/plate) and in a cytogenic assay evaluating sister chromatid exchanges and chromosome aberrations (at doses of 100 and 200 µg/plate). These effects in L5178Y mouse lymphoma cells were observed at the high end of the range of doses tested. Benzophenones-1, -3, -4, -9, and -11 were non-mutagenic both with and without metabolic activation in the Ames test.*

*In a modified Ames test, Benzophenone-2 and Benzophenone-6 (concentrations up to 1000 µg/ml) were not genotoxic to Salmonella typhimurium strains with or without metabolic activation.<sup>2</sup> Benzophenone-2 and Benzophenone-6 did not induce*

*unscheduled DNA synthesis in rat hepatocytes at concentrations up to 1000 nmol/ml. In a sister chromosome exchange assay, Benzophenone-8 was tested using Chinese hamster ovary cell cultures. Without metabolic activation, there was no significant increase in sister chromatid exchanges at concentrations ranging from 333 ng/ml to 10 µg/ml, but a slight increase was noted at 10 µg/ml. With metabolic activation, there was no increase in sister chromatid exchanges at concentrations ranging from 3.1 to 50 µg/ml. Benzophenone-8 was not genotoxic in a forward mutation assay involving Chinese hamster ovary cells, at concentrations ranging from 2.2 to 66.6 µg/ml with or without metabolic activation.*

The photo-genotoxicity of Benzophenone-1 (1 to 25 µg/ml, in culture medium) and apoptotic parameters were evaluated using human keratinocytes (HaCaT cells).<sup>81</sup> Results indicated that Benzophenone-1 photosensitized and generated intracellular reactive oxygen species (2.02 folds) under sunlight/UV radiation. Decrease in cell viability was recorded as 80.06%, 60.98%, and 56.24% under sunlight, UVA, and UVB, respectively. In the same study, the genotoxicity potential of Benzophenone-1 (5 to 25 µg/ml, in culture medium) was confirmed through photo-micronuclei and cyclobutene pyrimidine dimers (CPDs) formation. HaCaT cells treated with Benzophenone-1 in the presence of UVB (1.08 J/cm<sup>2</sup>) caused cyclobutane CPD formation. Micronuclei formation was detected in HaCaT cells treated with Benzophenone-1 (10 µg/ml) in the presence of UVB (1.08 J/cm<sup>2</sup>). Cells exposed to different concentrations of Benzophenone-1 in the presence of UVA (2.7 J/cm<sup>2</sup>) exhibited statistically significant ( $p > 0.01$ ) DNA damage when compared to control cells. The genotoxicity of Benzophenone-1, Benzophenone-3, Benzophenone-6, and Benzophenone-8 (doses up to 10 µg/well) was evaluated in the luminescent *umu*-test, using *Salmonella typhimurium* strain TL210.<sup>82</sup> Results indicated positive results for Benzophenone-3 and “pseudo-positive” (not defined) results for Benzophenone-1 and Benzophenone-8. In the same study, the genotoxicity of Benzophenone-1 (doses up to 600 µg/plate), Benzophenone-3 (up to 200 µg/plate), Benzophenone-6 (up to 2000 µg/plate), and Benzophenone-8 (up to 300 µg/plate) was evaluated in the Ames test using *S. typhimurium* strains TA98 and TA100 (with and without metabolic activation).<sup>82</sup> None of the test substances produced clear positive results with or without metabolic activation.

The genotoxicity of Benzophenone-3 and Benzophenone-8 (each in seawater) was evaluated at doses of 4 to 10 µl per plate using *S. typhimurium* strain TA98 (without metabolic activation).<sup>83</sup> Neither ingredient was genotoxic. The genotoxicity of Benzophenone-3 and Benzophenone-8, each in chlorinated bromide-rich water (artificial seawater), was also evaluated in the Ames test using *S. typhimurium* strain TA98 without metabolic activation. Only Benzophenone-8 (1:10) had clear genotoxic activity that was dose-related (doses of 4, 6, 8, and 10 µl). A sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated for genotoxicity using the following *S. typhimurium* strains: TA 98, TA100, TA1535 and TA1538.<sup>69</sup> The formulation was tested at a dose of 5000 µg/plate with and without metabolic activation. The sunscreen formulation was not genotoxic. The cytogenetic effect of Benzophenone-3 on human peripheral lymphocytes was evaluated using in vitro chromosomal aberrations and micronuclei assays.<sup>84</sup> Lymphocyte cultures were exposed to the following 5 concentrations of Benzophenone-3: 0.20 µg/ml, 0.10 µg/ml, 0.05 µg/ml, 0.025 µg/ml, and 0.0125 µg/ml. A statistically significant increase in chromosomal aberrations and aberrant cell frequencies was observed at all test concentrations, when compared to the solvent (DMSO) control. In the micronuclei test, Benzophenone-3 caused a statistically significant increase in micronuclei formation at all test concentrations. The effect of Benzophenone-3 on DNA damage was studied using human breast epithelial cells.<sup>85</sup> Concentrations of 1 µM and 5 µM Benzophenone-3 increased DNA damage in a manner that was similar to that of treatment with E2, and in an estrogen-receptor alpha (Er $\alpha$ )-dependent manner. Benzophenone-3 was evaluated for genotoxicity using *S. typhimurium* strains TA98 and TA100, and *Escherichia coli* strain *uvrA* pKM101.<sup>72</sup> The test substance was evaluated at doses up to 6000 µg/plate with and without metabolic activation. Benzophenone-3 was non-genotoxic.

A bacterial reverse mutation assay was used to evaluate the genotoxicity of Benzophenone-8 (in DMSO), using *S. typhimurium* strain TA100 and *E. coli* (*E. coli*) strain WP2vurA.<sup>8</sup> Strain TA100 was selected for testing at doses up to 1500 µg/plate, and strain WP2vurA was selected for testing at doses up to 5000 µg/plate. Benzophenone-8 was negative for genotoxicity in this assay, with and without metabolic activation. The mutagenicity of Benzophenone-8 (in ethanol) was evaluated in the *Salmonella*/mammalian microsome mutagenicity assay using the following *S. typhimurium* tester strains: TA98, TA100, TA1535, TA1537, and TA1538.<sup>86</sup> Benzophenone-8 test concentrations ranged from 0.008 to 700 µg/plate. Benzophenone-8 caused a weak, but reproducibly significant increase in the number of TA1537 revertants per plate. Benzophenone-8 (in ethanol) was tested in the L5178Y TK $\pm$  mouse lymphoma mutagenesis assay (with and without metabolic activation) at concentrations ranging from 13 to 56 µg/ml.<sup>87</sup> Cultures treated in the presence of metabolic activation exhibited a significant increase in the mutant frequencies, and a dose response was evident. Benzophenone-8 was genotoxic in this assay. The genotoxicity of Benzophenone-12 in the mammalian cell gene mutation assay (mouse lymphoma L5178Y cells) was evaluated.<sup>5</sup> Benzophenone-12 (in DMSO) was tested at doses up to 50 µg/ml (with metabolic activation) and up to 52 µg/ml (without metabolic activation). Benzophenone-12 was non-genotoxic without metabolic activation, and results were ambiguous with metabolic activation.

### In Vivo

*The genotoxicity of Benzophenone-1 was evaluated in the micronucleus assay (OECD TG 474) using mouse erythrocytes.<sup>6</sup> The doses tested were not stated. Genotoxicity results were classified as inconclusive. Benzophenone-2 and Benzophenone-6 did not induce sister chromatid exchanges in Chinese hamster bone marrow cells from animals (species not*

stated) dosed orally (doses up to 500 mg/kg).<sup>2</sup> In the micronucleus test, the oral dosing of mice with Benzophenone-8 (1500 mg/kg) did not cause a significant increase in the number of bone marrow micronuclei.

The genotoxicity of Benzophenone-3 was evaluated using the *Drosophila* somatic mutation and recombination test (SMART) and the in vivo cytogenetics assay using rat bone marrow cells.<sup>88</sup> In the SMART assay, larva from a mating of “multiple wing hair” (mwh) females with heterozygous “flare” (flr) males were exposed to 0, 3000, or 3500 mg/kg Benzophenone-3. None of the Benzophenone-3-treated larva produced flies with significantly more single or multiple wing spots than controls. An in vivo cytogenetic assay in rat bone marrow cells was conducted to evaluate the clastogenicity of Benzophenone-3.<sup>88</sup> Sprague-Dawley rats were treated by oral gavage with a single administration of 0.0, 500, 1670, or 5000 mg/kg Benzophenone-3, or a dose of 5 g/kg/d Benzophenone-3 for 5 consecutive days. None of the Benzophenone-3 concentrations caused any significant increase in chromosomal aberrations. The genotoxicity of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated in the mammalian erythrocyte micronucleus test using groups of 10 Wistar albino rats.<sup>69</sup> Doses of 500 mg/kg, 1000 mg/kg, and 2000 mg/kg were administered dermally for 2 consecutive days. The sunscreen formulation was non-genotoxic. The same sunscreen formulation (0.6% to 0.9% Benzophenone-3) was evaluated for genotoxicity in the mammalian bone marrow chromosome aberration test using groups of 10 Wistar albino rats.<sup>69</sup> Doses of the sunscreen, 500 mg/kg, 1000 mg/kg, and 2000 mg/kg, were administered dermally for 2 consecutive days. The sunscreen formulation was non-genotoxic. Ovariectomized mice (Balb/c female mice) were exposed to Benzophenone-3 at 10 d after the surgical procedure.<sup>85</sup> Eight mice were dosed orally with E2 and 12 mice were dosed orally with Benzophenone-3 daily for 4 d. Each mouse was administered 1 µl of tocopherol-stripped corn oil per gram of bw to deliver E2 (0.25 mg/kg/d) or Benzophenone-3 (3 mg/kg/d). Results indicated that R-loops and DNA damage were detected in mammary epithelial cells of mice treated with Benzophenone-3.

## **CARCINOGENICITY STUDIES**

### **In Vitro**

#### **Benzophenone-1**

Effects of Benzophenone-1 on the proliferation and metastasis of MCF-7 human breast cancer cells expressing estrogen receptors were studied.<sup>89</sup> The underlying mechanisms for these effects was also studied, including the study of alterations in transcriptional and translational levels of proliferation and metastasis-related markers (cyclin D1, p21, and cathepsin D). Treatment of the cells with Benzophenone-1 (0.1 to 10 µM) promoted the proliferation of MCF-7 cells in a manner that was similar to the positive control (E2). The addition of Benzophenone-1 also markedly induced the migration of MCF-7 cells in a manner that was similar to E2. Regarding underlying mechanisms of action, an increase in the expression of cyclin D1 and cathepsin D, and a decrease in p21 (at both transcriptional and translational levels) were reported. The authors concluded that Benzophenone-1 may accelerate the growth of MCF-7 breast cancer cells by regulating cell cycle-related genes and promote cancer metastasis through amplification of cathepsin D.

A wound healing assay and western blot assay were performed to show the effect of Benzophenone-1 on the migration of BG-1 ovarian cancer cells and the protein expression of epithelial-mesenchymal transition (EMT)-related genes.<sup>90</sup> The EMT process is associated with cell migration. Benzophenone-1 (1 µM) statistically significantly enhanced the migration capability of BG-1 cells by reducing the wounded area in the cell monolayer relative to the control, i.e., in a manner that was similar to E2 (0.001 µM). The authors stated that the results of this study indicate that Benzophenone-1 may have the ability to induce ovarian cancer metastasis via regulation of the expression of EMT markers and migration of estrogen receptor-expressing BG-1 ovarian cancer cells.

#### **Benzophenone-3**

The effect of Benzophenone-3 (concentrations up to 150 µg/l) on cancer cell growth was studied using NCI-H460 lung cancer cells.<sup>91</sup> At concentrations of 50 µg/l, 100 µg/l, and 150 µg/l, Benzophenone-3 statistically significantly increased colony formation of the NCI-460 cells, in both number and size. These observations indicate that Benzophenone-3 has a cancer potentiating effect by enhancing anchorage-independent survival and growth of lung cancer cells.

### **Animal**

#### **Oral**

#### **Benzophenone-3**

The oral carcinogenicity of Benzophenone-3 was evaluated in a National Toxicology Program (NTP) study using male and female B6C3F1/N mice and male and female Sprague-Dawley rats.<sup>72</sup> Groups of 50 male and 50 female mice were fed diets containing 0, 1000, 3000, or 10,000 ppm Benzophenone-3 in the diet (equivalent to average daily doses of approximately 0, 113, 339, and 1207 mg Benzophenone-3/kg bw, respectively, for male mice and 0, 109, 320, and 1278 mg/kg, respectively, for female mice) for 104 (female mice) or 105 (male mice) wk. Survival of all exposed groups of male and female mice was not statistically significantly different from that of the control groups. Mean bw of 1000 and 3000 ppm males and females were within 10% of those of the control groups throughout the study. Mean bw of 10,000 ppm male and female mice were at least 10% lower than those of the control groups, generally after wk 17 and 12, respectively. Feed

consumption by exposed groups of male and female mice was not statistically significantly different from that of the control groups.

The incidences of pigment in the bone marrow were statistically significantly increased in 10,000 ppm male and female mice. The incidences of pigment in the spleen were statistically significantly increased in 10,000 ppm male mice and 3000 ppm and 10,000 ppm female mice. In the liver, the incidence of hepatocyte syncytial alteration was statistically significantly increased in all exposed groups of male mice. In the kidney, the incidence of renal tubule cytoplasmic alteration was statistically significantly increased in 10,000 ppm male mice. The incidence of osseous metaplasia was statistically significantly increased in 10,000 ppm female mice, when compared to the control group. The authors concluded that there was no evidence of carcinogenic activity in male or female B6C3F1/N mice at exposure concentrations of 1000, 3000, and 10,000 ppm.

In the same NTP carcinogenicity study, on GD 6, groups of 42, 35, 35, and 43 F<sub>0</sub> time-mated female rats were fed diets containing 0, 1000, 3000, and 10,000 ppm Benzophenone-3, respectively, for 39 d. Groups of 50 (1000 and 3000 ppm) or 60 (0 and 10,000 ppm) F<sub>1</sub> rats per sex continued on study after weaning and were fed diets containing the same exposure concentrations for 105 wk; 10 F<sub>1</sub> rats per sex from the 0 and 10,000 ppm groups were evaluated at 14 wk. Dietary concentrations of 1000, 3000, and 10,000 ppm resulted in average daily doses of approximately 58, 168, and 585 mg Benzophenone-3/kg bw, respectively, for males and 60, 180, and 632 mg/kg body weight, respectively, for females. Survival of all exposed groups of F<sub>1</sub> male and female rats was not statistically significantly different from that of the control groups. Over the course of the study, mean bw of F<sub>1</sub> male rats and females in the 10,000 ppm exposure groups were 10 – 25% lower than those of the control groups. After wk 77, F<sub>1</sub> female rat mean bw in the 3000 ppm exposure group were 10% lower than those of the control group. Feed consumption by exposed groups of F<sub>1</sub> males and females was generally similar to that of the control group throughout the study.

In the brain, the occurrence of malignant meningiomas in male rats at the end of the 2-year study was 0/50 (control group), 1/50 (1000 ppm group), 3/50 (3000 ppm group), and 0/50 (10,000 ppm group). One male rat in the 3000 ppm group had a malignant meningioma in the spinal cord. In the thyroid gland, the incidence of C-cell adenoma in 3000 ppm female rats was statistically significantly greater than that in the control group at the end of the 2-year study. Only one female rat, in the 10,000 ppm group, had bilateral C-cell adenomas; the rest were unilateral lesions. One animal in the 1000 ppm group had both a C-cell adenoma and a C-cell carcinoma (in the opposite gland). There was no significant exposure concentration-related difference in the incidence of C-cell adenomas in male rats (0 ppm (7/50); 1000 ppm (10/50); 3000 ppm (8/50); and 10,000 ppm (8/50)) when compared to the control group.

In the uterus, the incidence of stromal polyps in 3000 ppm females was statistically significantly increased. A statistically significantly increased incidence of atypical endometrium hyperplasia of the uterus also occurred at 3000 ppm; however, the incidence of adenocarcinoma was statistically significantly decreased in this group. In the adrenal cortex, the incidences of focal hypertrophy were statistically significantly increased in 1000 and 3000 ppm female rats at the end of the 2-year study. In the testes, the incidence of interstitial cell hyperplasia showed a statistically significant positive trend, but there were no statistically significant pairwise comparisons of the exposed groups to the control group. The incidence of fibrinoid necrosis of the arterioles was statistically significantly increased in 10,000 ppm males when compared to the control group. In the pancreas, the incidence of chronic active inflammation affecting the arterioles was statistically significantly increased in 1000 ppm males, when compared to the control group at the end of the 2-year study. The incidences of mammary gland fibroadenoma and carcinoma were statistically significantly decreased, relative to the control group, in 10,000 ppm females at the end of the 2-year study (fibroadenomas: 32/50 (control), 30/50 (1000 ppm), 27/50 (3000 ppm), and 18/50 (10,000 ppm); carcinomas: 7/50 (control), 5/50 (1000 ppm), 7/50 (3000 ppm), and 1/50 (10,000 ppm)).

Perinatal studies and 14-wk interim evaluations were also conducted in rats from the NTP carcinogenicity study. Results from perinatal studies are included in the section on Developmental and Reproductive Toxicity. Results from 14-wk interim evaluations are included in the Subchronic (Oral) Toxicity section.

The authors concluded that, under the conditions of these 2-year studies, there was equivocal evidence of carcinogenic activity of Benzophenone-3 exposure in male Hsd:Sprague Dawley® SD® rats, based on the occurrence of malignant meningiomas in the brain. There was equivocal evidence of carcinogenic activity in female Hsd:Sprague Dawley® SD® rats, based on the increased incidence of thyroid C-cell adenomas and the increased incidence of uterine stromal polyps. There was no evidence of carcinogenic activity in male or female B6C3F1/N mice at exposure concentrations of 1000, 3000, and 10,000 ppm. It was noted that increases in the incidences of non-neoplastic lesions of the testis in male rats and of the uterus and adrenal cortex in female rats occurred with exposure to Benzophenone-3. Increases in the incidences of non-neoplastic lesions of the bone marrow (males and females), spleen (males and females), kidney (males and females), and liver (males) in mice occurred with exposure to Benzophenone-3.

### **Tumor Promotion**

#### **Benzophenone-3**

Groups of female BALB/c mice (number per group not stated) were fed diets with and without Benzophenone-3 (70 mg/kg bw and then were injected daily for 5 d with saline control or E2 (1 µg/injection).<sup>92</sup> Benzophenone-3 was

compounded into the diets at 0.75 g/kg chow for pubertal animals and 1.5 g/kg chow for adult animals; each dosage yielded consumption of approximately 70 mg/kg BW/d. Both pubertal and adult BALB/c mice were placed on low fat diet (LFD; 10% kcal fat) or high fat diet (HFD; 60% kcal fat) with and without Benzophenone-3, ovariectomized, allowed time for recovery and clearance of endogenous hormones, and then treated with E2 or control for 5 d. While no Benzophenone-3 effects were seen in the adult mice (data unavailable), the pubertal mice fed HFD plus Benzophenone-3 showed higher mammary gland proliferation (mammary epithelial proliferation) in response to E2 than did mice fed HFD alone. No Benzophenone-3 effects were observed in the absence of E2, and no Benzophenone-3 effects were observed in mice fed LFD. Additional experiments in this study are summarized below.

The effects of Benzophenone-3 (doses of 0.7 mg/kg bw, 7 mg/kg bw, and 70 mg/kg bw) in an acute exposure regimen were evaluated, with and without co-treatment with E2, in ovariectomized, pubertal BALB/c mice (number not stated) fed HFD.<sup>92</sup> After 1 week the mice were ovariectomized. Recovery was allowed for 3 weeks after ovariectomy before Benzophenone-3 and E2 treatments. The mice were injected daily for 5 d with saline control or E2 (1 µg/injection) and/or given Benzophenone-3 by gavage in vegetable oil (0.7 mg/kg bw, 7 mg/kg bw, or 70 mg/kg bw). While Benzophenone-3 alone showed no effects at any dose (data not shown), Benzophenone-3 augmented the proliferative response to E2 in both ducts and duct ends at the standard dose and in duct ends at the 0.1 dose.

For tumorigenesis promotion experiments, female Trp53-null transplanted mice (number not stated) generated from BALB/c Trp53+/- breeding mice) were randomly assigned into various dietary groups.<sup>92</sup> In the Trp53-null mouse model, fragments of donor mammary epithelium were collected from female BALB/c Trp53-null mice at 8 weeks of age, and transplanted into the cleared inguinal mammary fat pads of 3-week-old female wild type BALB/c mice. For the continuous LFD group, the diet was initiated after transplantation at 3 weeks of age and maintained throughout the studies. For the HFD-LFD and LFD-HFD groups, mice were initially fed one diet from 3 weeks until 10 weeks of age, and then switched to the other diet thereafter. For diets containing Benzophenone-3, Benzophenone-3 was compounded into the diets at 0.75 g/kg chow for pubertal animals (3 to 10 weeks of age) and 1.5 g/kg chow for adult animals; each dosage yielded consumption of approximately 70 mg/kg BW/d. All mice were killed at estrus; 5-bromo-2'-deoxyuridine (BrdU) (70 µg/g bw) was administered via i.p. injection 2 h before the animals were killed for analysis of cellular proliferation. Benzophenone-3 was protective for epithelial tumorigenesis in mice fed lifelong LFD, while promotional for epithelial tumorigenesis in mice fed adult HFD. Benzophenone-3 increased tumor cell proliferation, decreased tumor cell apoptosis, and increased tumor vascularity dependent on specific dietary regimen and tumor histopathology. Although Benzophenone-3 seemed protective on LFD, spindle cell tumors arising in these mice showed increased proliferation and decreased apoptosis.

### In Vitro Cell Transformation Studies

#### Benzophenone-1

The xenoestrogenic effect of Benzophenone-1 on BG-1 human ovarian cancer cells expressing estrogen receptors and relevant xenografted animal models, when compared to E2, was evaluated.<sup>93</sup> In the in vitro cell viability assay, Benzophenone-1 (0.01 to 10 µM) statistically significantly increased BG-1 cell growth, as did E2. The mechanism underlying BG-1 cell proliferation induced by Benzophenone-1 was shown to be related to the up-regulation of cyclin D1, a cell cycle progressor. Both Benzophenone-1 and E2 induced cell growth and up-regulation of cyclin D1 were reversed by co-treatment with an ER antagonist, suggesting that Benzophenone-1 may, similar to E2, mediate the cancer cell proliferation via an estrogen receptor-dependent pathway. However, the expression of p21 (regulator of cell cycle progression at G<sub>1</sub> phase) was not altered by Benzophenone-1, though it was down-regulated by E2.

In a second experiment, BG-1 cells (5 x 10<sup>6</sup>) were injected s.c. into the backs of groups of 6 female mice of the BALB/c *nu/nu* strain. The mice were monitored for tumor growth. Once the tumors reached a volume of 50 mm<sup>3</sup>, the mice were surgically ovariectomized. One week after surgery, 6 mice were injected s.c. with E2 (0.02 mg/kg) every 2 d for 8 wk, and another group of 6 mice was dosed s.c. with Benzophenone-1 (200 mg/kg). The vehicle control group was dosed with corn oil. Benzophenone-1 or E2 treatment statistically significantly increased the tumor mass formation (compared to corn oil vehicle) within 8 wk. At histopathological examination, the tumor sections of the E2 or Benzophenone-1 group displayed extensive cell formations with high density and disordered arrangement. These results were supported by the increased number of BrdUrd positive nuclei and the over-expression of cyclin D1 protein. The authors noted that the results of this study suggest that Benzophenone-1 is an endocrine disrupting chemical that exerts xenoestrogenic effects (in manner similar to E2) by stimulating the proliferation of BG-1 ovarian cancer via the estrogen receptor signaling pathway associated with the cell cycle.

A study was performed to evaluate the effects of Benzophenone-1 on prostate cancer progression, including cell proliferation and migration.<sup>94</sup> Additionally, the alterations in protein expressions of cell cycle related genes, as well as cathepsin D gene as a metastasis marker by Benzophenone-1, were investigated in an effort to explain the underlying mechanism. To evaluate the effect on cell proliferation, the 3-(4-(5-dimethylthiazol-2-yl)-2,5-diphenyltetrazolium bromide (MTT) assay (n = 3) was performed using LNCaP prostate cancer cell cultures. This cell line was originally isolated from the lymph node of a patient with metastatic prostate cancer. LNCaP cells were treated with Benzophenone-1 (0.01 to 10 µM) for 4 d. The incubation medium was described as phenol-free Dulbecco's modified eagle medium (DMEM) supplemented with 1% DMSO. To demonstrate the connection between Benzophenone-1 and the androgen receptor signaling pathway, LNCaP



cells were co-treated with Benzophenone-1 (1  $\mu\text{M}$ ) and bicalutamide (0.001  $\mu\text{M}$ , androgen receptor antagonist;  $n = 3$ ). In the migration assay, LNCaP cells were treated with 10% charcoal/dextran-treated fetal bovine serum (FBS) containing 1  $\mu\text{M}$  Benzophenone-1 for 5 d ( $n = 4$ ). The Western blot analysis was used to measure protein expressions for c-fos, cyclin E, p321, and cathepsin D. LNCaP cells were cultured with Benzophenone-1 for a fixed period of time. After treatment, whole cell lysates of LNCaP cells were prepared (in buffer solution) in a time-dependent manner (0, 24, and 48 h). The proteins were transferred to a polyvinylidene difluoride membrane, and the membranes were incubated overnight with the following antibodies: rabbit polyclonal anti-cyclin E, anti-c-fos antibody, anti-cathepsin D antibody, mouse monoclonal anti-p21, and anti-glyceraldehyde-3-phosphate dehydrogenase (GAPDH). This experiment was repeated ( $n = 3$ ).

Benzophenone-1 increased the viability of LNCaP cells at concentrations of 1  $\mu\text{M}$  and 0.1  $\mu\text{M}$ . In the MTT assay, when the cells were co-treated with Benzophenone-1 (1  $\mu\text{M}$ ) and bicalutamide (0.001  $\mu\text{M}$ ), the cell viability that was increased by Benzophenone-1 alone was statistically significantly reduced. These results suggest that the proliferative effects of Benzophenone-1 on LNCaP cells was mediated by the androgen receptor signaling pathway. In the experiments relating to cell mobility, Benzophenone-1 (1  $\mu\text{M}$ ) increased cell migration when compared to the DMSO control. In parallel with the changes in cell viability levels, the migration activity of LNCaP cells increased by Benzophenone-1 was statistically significantly reduced by co-treatment with bicalutamide (0.001  $\mu\text{M}$ ). These results indicate that the stimulatory effects on LNCaP cell migration induced by Benzophenone-1 were mediated via the androgen receptor signaling pathway.

Protein expression of cyclin E, one of the proteins required for cell cycle progression, was enhanced by Benzophenone-1 at 24 and 48 h. The protein expression level of p21 (regulator of cell cycle progression) was statistically significantly reduced by Benzophenone-1 at 24 h, when compared to DMSO. Protein expression of c-fos was not statistically significantly induced by Benzophenone-1. For cathepsin D (metastasis marker), its protein expression levels were statistically significantly increased by Benzophenone-1 (100  $\mu\text{M}$ ) at 24 and 48 h, when compared to the control. To determine whether or not the effects of Benzophenone-1 on the expressions of cyclin E, p21, and cathepsin D were mediated by the androgen receptor signaling pathway, a Western blot analysis was performed on protein samples isolated from LNCaP cells treated with Benzophenone-1 (1  $\mu\text{M}$ ) in the presence of bicalutamide. The protein levels of cyclin E, p21, and cathepsin D were not changed at 24 and 48 h. These results may suggest that the protein expressions of these genes are induced by Benzophenone-1 via the androgen receptor signaling pathway. The authors concluded that the results of this study indicate that Benzophenone-1 may enhance the progression of prostate cancer by regulating cell cycle and metastasis-related genes via the androgen receptor signaling pathway.

#### *Benzophenone-1, Benzophenone-3, Benzophenone-6, and Benzophenone-8*

The second process in carcinogenesis, promotion, was studied using the Bhas promotion assay.<sup>82</sup> This is a test that is used to detect the formation of transformation foci, using Bhas 42 cells established from BALB/3T3 cells. Benzophenone-1, Benzophenone-3, Benzophenone-6, and Benzophenone-8 were tested, and each was evaluated at concentrations ranging from 2 to 100  $\mu\text{g/ml}$ . On day 21 of incubation, the cells were fixed with methanol and dyed. After air-drying, the number of transformation foci was counted using a stereoscopic microscope. The transformation foci were identified using the following 5 criteria: (1) more than 50 cells in a focus area, (2) cells in the focus area are spindle-shaped and different from surrounding cells, (3) cells in the focus area across each other in a random sequence, (4) cells grow in a stacked manner, and (5) the cytoplasm is intensely dyed by basicity. 12-*O*-Tetradecanoylphorbol-13-acetate (TPA) served as the positive control.

Dosing (all doses) with Benzophenone-3 and Benzophenone-6 did not result in any statistically significant increase in the number of foci relative to the solvent controls, indicating negative promotion activity. Particularly, Benzophenone-6 and Benzophenone-8 produced less foci than the solvent controls at concentrations of 5  $\mu\text{g/ml}$  and above 20  $\mu\text{g/ml}$ , respectively. Cell survival rates declined at the concentrations at which the number of foci decreased. Thus, the effect of cytotoxicity was believed to have been the cause of the decrease in the number of foci. For testing with Benzophenone-1, there was no increase in the number of foci at concentrations below 5  $\mu\text{g/ml}$ . However, at 10  $\mu\text{g/ml}$ , there was a statistically significant increase to  $6 \pm 2.4$  foci/well. This increase was more than twice that of the number of foci in the solvent controls ( $2.2 \pm 1.5$  foci/well). However, the increase was 1.5% per gram when compared to the number of foci in the positive controls (50 ng/ml TPA,  $20.2 \pm 5.2$  foci/well). At a concentration of 20  $\mu\text{g/ml}$ , the number of foci was comparable to that of the solvent controls, but the cell survival rate was lower (31%), suggesting toxicity of the test substance. Benzophenone-1 was believed to have been a tumor promoter (at 10  $\mu\text{g/ml}$ ), based on results indicating that it caused a statistically significant increase to more than twice that of the controls. However, the tumor promotion potential of Benzophenone-1 was apparently weak when compared to the level in the positive controls. The authors noted that the results of this study indicate that none of the test substances resulted in a statistically significant increase in the number of foci (relative to the solvent controls DMSO and methanol) over the range of concentrations tested, indicating negative promotion activity.

### **ANTI-CARCINOGENICITY STUDIES**

#### *Benzophenone-8 and Benzophenone-12*

The in vivo anti-tumor activity of Benzophenone-8 and Benzophenone-12 was evaluated using a two-stage mouse skin carcinogenesis model.<sup>95</sup> In this model, ( $\pm$ )-*E*-4-methyl-2-[-*E*-hydroxyamino]-5-nitro-6-methoxy-3-hexamide (NOR-1) served as the inducer and TPA as the promoter. Groups of 15 pathogen-free, female hairless mice of the HOS:HR-1 strain

were used. Skin tumors were induced by a single dose of NOR-1 (390 nmol in 100  $\mu$ l of acetone). At 1-wk post-dosing, TPA (1.7 nmol in 100  $\mu$ l of acetone) was applied to the skin twice weekly for 20 wk as a tumor promoter. Each test substance was administered at a concentration of 0.0025% to mice through drinking water (ad libitum), beginning at 1 week prior to tumor initiation and ending at 1 week after tumor initiation. All animals were examined weekly for the development of skin papillomas. When compared to the positive control (NOR-1) group, the following observations were made for both test substances: 2-wk delay in tumor appearance, statistically significant inhibition ( $p < 0.001$ ) of tumor incidence (60% for Benzophenone-8; 50% for Benzophenone-12), and statistically significant inhibition of tumor burden (papilloma inhibition per mouse: 70% for Benzophenone-8 and 50% for Benzophenone-12). Benzophenone-8 was a more potent inhibitor of skin tumors than Benzophenone-12.

## **OTHER RELEVANT STUDIES**

### **Effect on Gene Expression**

#### **Benzophenone-3**

A study was performed to determine whether Benzophenone-3 exposure alters gene expression profiling in the prostate and testis.<sup>80</sup> Groups of 25 pregnant Sprague-Dawley rats were fed low-phytoestrogen chow containing 3000 or 30,000 ppm Benzophenone-3 from GD 6 until postnatal day 21. The male offspring were then weaned on postnatal day 28, and subsequently dosed with Benzophenone-3 via chow and milk. The offspring were killed on postnatal day 30 and tissue samples were collected. RNA samples from the prostate and testis (1 male pup per litter; 5 litters per group) were extracted. Microarray gene expression profiling was performed on the tissue samples. Results indicated that gene expression profiles of the prostate and testis were differentially affected by Benzophenone-3 dose and duration of exposure. Tissue-specific alterations were also indicated. Microarray analyses of prostate gene expression patterns of rats exposed perinatally to Benzophenone-3 identified significant expression of 334 and 689 genes in the 3000 and 30,000 ppm exposure groups, respectively, when compared to the controls ( $p < 0.05$ ; fold change  $> 1.5$ ). Seventy-six genes overlapped between the 2 Benzophenone-3 exposure groups in the prostate. Microarray analyses of testis-gene expression patterns identified 239 and 1159 genes that were significantly altered in the testis in animals of the 3000 ppm and 30,000 ppm Benzophenone-3 perinatally exposed groups, respectively. Between the 2 Benzophenone-3 exposure groups, 220 genes overlapped in expression profile in the testis. The authors noted that the gene expression changes observed in this study were only observed at concentrations that exceed typical human exposure to Benzophenone-3.

### **Effect on Melanogenesis**

#### **Benzophenone-2**

The dual action of Benzophenone-2 in the biosynthetic pathway of melanin has been identified.<sup>96</sup> It has been observed to act as a weak competitive inhibitor of tyrosinase (inhibition constant ( $K_i$ ) =  $2020 \pm 90$   $\mu$ M; half maximal inhibitory concentration ( $IC_{50}$ ) =  $3820 \pm 390$   $\mu$ M). Both forms of Benzophenone-2 (protonated and deprotonated) interact with tyrosinase, the enzyme that catalyzes the production of melanin from tyrosine. Benzophenone-2 (at 250 and 500  $\mu$ M) also accelerated the conversion of dopachrome (intermediate in melanin biosynthesis) to melanin.

### **Neurotoxicity**

#### **Benzophenone-2**

A study was performed, using groups of 10 male Wistar rats, to determine apoptosis and oxidative stress markers in the rat brain after topical administration of Benzophenone-2.<sup>33</sup> The markers studied were: active form of caspase-3, pro-apoptotic protein (Bax), and anti-apoptotic protein (Bcl-2). The effect of dosing on these markers was studied to determine whether Benzophenone-2 may be involved in the induction or exacerbation of neurodegenerative changes. Benzophenone-2 was dissolved in a small amount (volume not stated) of ethanol and olive oil, and formulated with Hascobase. The test substance was then applied to shaved skin at a dose of 100 mg/kg for 4 wk. Hascobase with a small amount of ethanol and olive oil was applied to the skin of control rats. In the hippocampus, where the Benzophenone-2 concentration was  $\sim 3.5$ -fold lower than in the frontal cortex, no statistically significant changes in oxidative stress and apoptosis markers were observed. In the frontal cortex, there was no change in apoptosis markers, but, unexpectedly, the oxidative stress markers were reduced. The authors concluded that Benzophenone-2 did not exacerbate oxidative stress and apoptosis markers in the hippocampus and frontal cortex. However, it did lower oxidative stress in the frontal cortex.

#### **Benzophenone-2 and Benzophenone-3**

The effect of Benzophenone-2 and Benzophenone-3 on the neuroblastoma (SH-SY5Y) cell line was evaluated by studying effects on cell viability and caspase-3 (main executive enzyme in programmed cell death) activity.<sup>97</sup> The MTT reduction test and LDH release activity assay were used. After a 72-h incubation period, both Benzophenone-2 and Benzophenone-3 produced a statistically significant cytotoxic effect at concentrations of 10  $\mu$ M and 100  $\mu$ M in both assays. Additionally, both Benzophenone-2 and Benzophenone-3 caused an increase in caspase-3 activity at much lower concentrations (from 0.01  $\mu$ M to 0.1  $\mu$ M). The authors noted that the results of this study indicate that Benzophenone-2 and Benzophenone-3 adversely affected the viability of nerve cells, most likely by enhancing the process of apoptosis.

### Benzophenone-3

The toxicity of Benzophenone-3 to primary cortical neurons and primary cortical astrocytes (cultured from E17 and E19 rat fetuses) was studied.<sup>34</sup> Cultures were treated with the following 3 concentrations at culture durations of 24 h, 48 h, and 7 d: 0.1 µg/ml, 1 µg/ml, and 10 µg/ml. Cell viability was analyzed using the standard MTT assay. The experiments were performed in triplicates on a minimum of 3 independent cultures. Untreated cultures served as controls. No significant differences in astrocyte viability were observed for a 24-h or 48-h exposure when compared to the control group. A 36% decrease in neuron viability was observed when cultures were exposed to Benzophenone-3 (10 µg/ml) for 7 d.

A study was performed to determine the effects of Benzophenone-3 on apoptosis and the expression of estrogen, androgen, and arylhydrocarbon receptors (AhR) in the rat frontal cortex and hippocampus.<sup>98</sup> The test substance was administered dermally to pregnant female Sprague-Dawley rats and to their male offspring through 6 and 7 wk of age. Benzophenone-3 (in a cream) was applied to a 25 cm<sup>2</sup> (5 cm x 5 cm) area on the back, at a dose of 100 mg/kg, twice daily. After birth, the offspring were observed for any abnormalities daily. The animals were killed at 24 h after the last dose of Benzophenone-3. Brain structures (hippocampus and frontal cortex) were removed. Benzophenone-3 in the frontal cortex induced the mitochondrial apoptosis pathway by increasing the active forms of caspase-3 and caspase-9, thereby inducing the pro-apoptotic proteins Bax and Bak and increasing the number of cells with apoptotic DNA fragmentation. In the hippocampus, an increase in caspase-9 and a downward trend in the level of anti-apoptotic proteins were observed. In both regions of the brain, the contents of estrogen receptor beta (Erβ) in the nuclear fraction and G protein-coupled receptor 30 (GPR30) in the membrane fraction were statistically significantly reduced. Benzophenone-3 statistically significantly increased AhR in the cytosol of the frontal cortex, but had no effect on the content of this receptor in the hippocampus. The authors noted that the results of this study indicate that exposure to Benzophenone-3 induces the mitochondrial apoptosis pathway in the rat frontal cortex.

Mouse neuronal cells (from neocortical and hippocampal tissues prepared from Swiss mouse embryos) were used to evaluate the neurotoxicity of Benzophenone-3 (in DMSO).<sup>99</sup> Primary neuronal cell cultures were exposed to Benzophenone-3 (1 to 100 µM) for 24 h. A continuous 24-h exposure of neocortical cultures to Benzophenone-3 (25 to 100 µM) induced apoptosis in mouse neuronal cells. Hippocampal cells exhibited weaker vulnerability.

The neurotoxicity of Benzophenone-3 and its metabolite (Benzophenone-1) was studied using female Sprague-Dawley rats and their offspring.<sup>35</sup> Benzophenone-3 (10% in cream; dose = 100 mg/kg) was administered dermally (shaved skin on back) twice daily to adult female rats (number not stated) during the prenatal period and adulthood. Control female rats were treated with cream without Benzophenone-3. At 21 d after birth, the offspring (male and female) were divided into groups of 5 males and groups of 5 females. From 43 to 56 d of age, the test substance was administered dermally to the male offspring. Cream without Benzophenone-3 was applied to control offspring. In brain structures, selected markers of brain damage were measured. Though the neurotoxicity of Benzophenone-3 and its metabolite (Benzophenone-1) were to have been studied, it was noted that Benzophenone-1 was not identified in structures of the brain. Thus, results relating to neurotoxicity are reported for Benzophenone-3 only. In structures of the brain, results indicated that dosing with Benzophenone-3 raised oxidative stress and induced apoptosis in the brain. Benzophenone-3 increased the concentration of extracellular glutamate in examined brain structures and changed the expression of glutamate transporters. The results of this study indicated that dermal Benzophenone-3 exposure may cause damage to neurons that might be associated with the increase in the level of extracellular glutamate. The authors noted that this increase is most likely evoked by changes in expression of the glutamate transporters, glutamate transporter-1 (GLT-1) and cystine/glutamate antiporter (xCT).

### **Behavioral Toxicity**

#### Benzophenone-3

In a study performed to characterize the skin permeation and tissue disposition of Benzophenone-3 (in ethanol) in rats (groups of 10; 5 males and 5 females per group), behavioral toxicity was also assessed<sup>34</sup> The test solution was applied (volume = 100 µl; dose = 5 mg/kg (312.5 µg/cm<sup>2</sup>)) topically to a 4 cm<sup>2</sup> area on the back, daily for 30 d. (Results relating to skin permeation and tissue distribution are included in the section on Skin Penetration.) In this study, various behavioral testing protocols were used to assess the arousal (open field tests), locomotion (open field and ladder test), habituation (open field test), and motor coordination (open field and ladder test) of the animals over the study duration. Each rat was tested individually, 4 h after dosing on day 29, to assess behavioral changes from the topical applications. Except for positive controls, all animals (test and negative (saline and vehicle (70% ethanol solution) control groups) passed the 29-d study period without significant adverse effects. Visible impairment was observed in the positive control (acrylamide) group.

### **Immunomodulatory Effects**

#### Benzophenone-2

The in vitro effect of Benzophenone-2 on the production of interferon (IFN)-γ and interleukin (IL)-10 was studied.<sup>100</sup> IFN-γ and IL-10 are two cytokines representing the Th-1 lymphocyte and Th-2 lymphocyte response, respectively, by activated murine splenocytes. Splenocytes were cultured in the presence of different concentrations of Benzophenone-2 (0.01 to 10 µM). Benzophenone-2 (10 µM) shifted the Th1/Th2 balance toward a Th2 response (lower IFN-γ production and higher IL-10).

Benzophenone-2 (in ethanol) was administered dermally (100 mg/kg), twice daily for 4 wk, to 10 male Wistar rats.<sup>101</sup> Immunological parameters were assayed 24 h after the last administration. Dosing with Benzophenone-2 did not change relative weights of the spleen and thymus, and was not toxic to splenocytes and thymocytes. However, dosing did increase the proliferative activity of splenocytes, and also enhanced the metabolic activity and viability of splenocytes and thymocytes.

#### Benzophenone-4

The immunosuppressive activity of Benzophenone-4 (0.01%) was evaluated using human dendritic cells (e.g., CD14+ human monocytes).<sup>102</sup> Cytokines can be released by dendritic cells and regulate the activation of T cells. The culturing of monocytes with Benzophenone-4 (0.01%) did not induce significant morphological changes and did not impair monocyte differentiation. The monocytic marker CD14 was unchanged. The effect of Benzophenone-4 (0.01%) on the expression of surface molecules that are critical for dendritic cell function was also investigated. Immature and mature dendritic cells were cultured with Benzophenone-4 (0.01%). Immature dendritic cells generated with or without the test substance showed a similar expression profile. In mature dendritic cells, treatment with the test substance led to down-regulation of HLA-DR (major histocompatibility complex (MHC) molecule) and CD40 (cell surface receptor that belongs to tumor necrosis factor receptor family) expression. Benzophenone-4 treatment also slightly decreased the secretion of IL-12, but this did not reach statistical significance. Treatment with Benzophenone-4 did not impair the proliferation of lymphocytes. Thus, in this study, Benzophenone-4 modulated the phenotype and function of monocyte-derived dendritic cells. CD40 expression was reduced by Benzophenone-4. All of these features suggest that the treatment of dendritic cells with Benzophenone-4 favors an immature activation status that can regulate T cell responses.

### Endocrine Activation

#### Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-4, and Benzophenone-8

A study was performed to investigate the thyroid-activation potential of benzophenones, using a rat pituitary carcinoma cell line (GH3 cell line) and a rat thyroid follicular cell line (FRTL-5 cell line).<sup>103</sup> Also, zebrafish (*Danio rerio*) embryo exposure (up to day 6 post-fertilization) involved the benzophenones (Benzophenones-1, -2, -3, -4, and -8) that were identified based on the transcriptional changes that were observed in the cells. The test concentrations in GH3 cells were as follows: Benzophenone-1 (up to 6.9 mg/l (32  $\mu$ M)), Benzophenone-2 (up to 2.5 mg/l (10  $\mu$ M)), Benzophenone-3 (up to 22.8 mg/l (100  $\mu$ M)), Benzophenone-4 (up to 98.7 mg/l (320  $\mu$ M)), and Benzophenone-8 (up to 24.4 mg/l (100  $\mu$ M)). In FRTL-5 cells, the test concentrations were: Benzophenone-1 (up to 68.6 mg/l), Benzophenone-2 (up to 78.8 mg/l), Benzophenone-3 (up to 73 mg/l), Benzophenone-4 (up to 98.7 mg/l), and Benzophenone-8 (up to 24.4 mg/l). The test concentrations in zebrafish embryos were: Benzophenone-1 (up to 1000  $\mu$ g/l), Benzophenone-3 (up to 320  $\mu$ g/l), and Benzophenone-8 (up to 320  $\mu$ g/l). Results indicated that, in GH3 cells, Benzophenone-1 (1 to 32  $\mu$ M), Benzophenone-2 (0.32 to 10  $\mu$ M), Benzophenone-3 (at doses around 32  $\mu$ M), and Benzophenone-8 (at doses around 32  $\mu$ M), but not Benzophenone-4, statistically significantly down-regulated the *Tsh $\beta$* , *Trhr*, and *Tr $\beta$*  genes. For Benzophenone-4 (concentration not stated), slight but significant down-regulation was observed only for the *Tr $\beta$*  gene. Additionally, some of the benzophenones (Benzophenones -1, -2, -3, and -4 (10 to 320  $\mu$ M; Benzophenone-8 (3.2 to 100  $\mu$ M)) statistically significantly upregulated the *Nis* and *Tg* genes, while down-regulating the *Tpo* gene in the FRTL-5 cells. Zebrafish larvae treated with Benzophenone-3 and Benzophenone-4 had a statistically significant decrease in triiodothyronine (T3) levels, but not thyroxine (T4) levels, at test concentrations as low as 32  $\mu$ g/l. However, Benzophenone-1 statistically significantly decreased both T3 and T4 levels in fish larvae at 320 and 1000  $\mu$ g/l. The up-regulation of the *dio1* and *ugr1lab* genes in the zebrafish suggests that decreased thyroid hormones are caused by changing metabolism of the hormones. The results of this study indicate that benzophenones can alter thyroid hormone balances by influencing the central regulation and metabolism of hormones.

#### Benzophenone-2

The endocrine activation potential of Benzophenone-2 was evaluated using groups of 11 ovariectomized adult Sprague-Dawley rats.<sup>104</sup> The test groups were dosed orally (by gavage) with 250 mg/kg and 1000 mg/kg Benzophenone-2 (1 ml) daily for 5 d. Another group was dosed with E2 valerate (600  $\mu$ g/kg) according to the same procedure. Control animals were dosed with olive oil. Dosing was initiated 14 d after ovariectomy. Average food intake was significantly reduced during the treatment period. However, there were no differences in liver, spleen, nor adrenal weights between test and control groups. Dosing with E2 valerate resulted in significantly increased uterine weight. Both doses of Benzophenone-2 also had this effect on the uterus. Blood luteinizing hormone levels were statistically significantly reduced after dosing with E2 valerate and 1000 mg/kg Benzophenone-2. There was no evidence of changes in mRNA levels of gonadotropin releasing hormone in the preoptic area of the hypothalamus. A dose-dependent suppression of T4 concentration by Benzophenone-2 was observed. T3 levels were also reduced.

A dose-response experiment involving 5 doses (10, 33, 100, 333, or 1000 mg/kg) of Benzophenone-2 was performed using female Sprague-Dawley adult, ovariectomized rats (groups of 5).<sup>38</sup> Doses were administered (by gavage) once per day for 5 d. Free levels of Benzophenone-2 in rat serum were sufficient to induce an unequivocal estrogen-like effect in the uterus. When compared to the vehicle (olive oil) control group, mean uterine weight was increased statistically significantly in the 333 mg/kg and 1000 mg/kg dose groups. A similar study (groups of 12; same doses and protocol) involved

ovariectomized rats of the same strain.<sup>105</sup> E2 valerate served as the positive control. None of the animals showed clinical signs of toxicity. Benzophenone-2 exerted an estrogenic effect on the following uterine parameters at the administered doses: wet weight, complement protein 3 (C3), insulin-like growth factor (IGF1), and estrogen receptor  $\beta$  (Er $\beta$ ) gene expression. According to results from another study, Benzophenone-2 acts as a n Er $\alpha$  and Er $\beta$  agonist mimicking the effects of E2 benzoate.<sup>106</sup>

Benzophenone-2 was evaluated for its effect on the hypothalamic-pituitary-thyroid (HPT) axis.<sup>101</sup> The test substance was dissolved in a small amount (volume not stated) of ethanol and olive oil and formulated with Hascobase. The test substance was then applied to shaved skin of 10 male Wistar rats at a dose of 100 mg/kg for 4 wk. HPT activity was increased, i.e., the level of thyroid-stimulating hormone (TSH) was reduced and the free fraction of T3 and T4 in the blood was increased.

Benzophenone interference with the thyroid hormone axis was studied.<sup>107</sup> Whether or not Benzophenone-2 inhibits key reactions of thyroid hormone biosynthesis catalyzed by thyroid peroxidase was examined in this study. A novel in vitro assay, based on human recombinant thyroid peroxidase stably transfected into the human follicular thyroid carcinoma cell line FTD-238, was used. Benzophenone-2 (300 nmol/l) combined with the thyroid peroxidase substrate hydrogen peroxide (10  $\mu$ mol/l) inactivated human recombinant thyroid peroxidase.

Benzophenone-2 interference with thyroid function was also studied in vivo.<sup>107</sup> Groups of 12 adult female Sprague-Dawley rats were bilaterally ovariectomized and fed a soy-free diet containing iodide ad libitum. At 14 d after ovariectomy, groups of 12 rats were dosed orally (by gavage, once per day) with Benzophenone-2 at the following doses (dose volume = 1 ml): 10 mg/kg, 33 mg/kg, 100 mg/kg, 333 mg/kg, and 1000 mg/kg. The animals were killed at day 5, and thyroid glands were excised. A dose-dependent decrease in total serum T4 levels was observed, with statistically significant alterations at doses of 333 mg/kg and 1000 mg/kg. The small decrease in total T3 was not statistically significant. TSH levels were increased at doses of 333 mg/kg and 1000 mg/kg, and this increase was statistically significant at both doses. Thyroid peroxidase activities in the thyroid glands of treated animals were measured ex vivo, but no statistically significant dose-dependent changes were observed. In the livers of animals treated with 1000 mg/kg Benzophenone-2, type I 5'-deiodinase activity was decreased, and this decrease was statistically significant. However, an increase in type I 5'-deiodinase activity was observed at a dose of 33 mg/kg.

### Benzophenone-3

The effect of a sunscreen containing Benzophenone-3 (10%) on thyroid function was studied using 32 subjects (15 men and 17 women).<sup>108</sup> The product was applied daily as a whole-body topical application (2 mg/cm<sup>2</sup>) in 1 week. The daily amount of cream applied over 4 d was 40  $\pm$  3 g (mean value for men) and 35  $\pm$  3 g (mean value for women). Hormone levels were measured by commercially available automated immunoassay systems. No biologically significant effects on hormone levels were observed. This indicates that absorbed Benzophenone-3 was not capable of disturbing the homeostasis of thyroid hormones in adult humans. There was no effect on TSH levels, and there was no increase in the level of T4 or T3 in males or females.

The estrogenic activity of Benzophenone-3 was evaluated in a reporter gene assay using the human cervical epithelioid HeLa cell line as the host cell line for the generation of stable reporter cells for screening substances that act via human estrogen-receptor-alpha (hER $\alpha$ ) and  $\beta$  (hER $\beta$ ).<sup>109</sup> The following 3 reporter cell lines (all estrogen receptor cell lines) were used: HELN, HELN Er $\alpha$ , and HELN Er $\beta$ . HELN Er $\alpha$  and HELN Er $\beta$  cell lines exhibited transactivation of luciferase gene expression by E2. Luciferase (served as the reporter) assays were performed at concentrations between 0.1  $\mu$ M and 10  $\mu$ M. Cells were incubated with Benzophenone-3 for 16 h. Benzophenone-3 activated Er $\alpha$  moderately and had almost no effect on Er $\beta$ . Benzophenone-3 was not considered estrogenic at 10  $\mu$ M.

The effect of Benzophenone-3 on the secretory and proliferative activity of rat (adult female Wistar rats) adrenocortical cells was investigated in vitro.<sup>110</sup> Within 120 min of culture, Benzophenone-3 (1  $\times$  10<sup>-6</sup>  $\mu$ M to 0.01  $\mu$ M) stimulated basal corticosterone production from dispersed adrenocortical cells. The chronic, 24-h exposure to Benzophenone-3 (0.0001  $\mu$ M) increased basal corticosterone secretion from cultured adrenocortical cells. The proliferative activity of the cultured adrenocortical cells was unaffected by treatment with Benzophenone-3.

Benzophenone-3 was evaluated for estrogenic potential, both in vivo and in vitro.<sup>111</sup> In MCF-7 breast cancer cells incubated for 6 d, Benzophenone-3 increased cell proliferation, with a median effective concentration (EC<sub>50</sub>) between 1.56 and 3.73  $\mu$ M. In the uterotrophic assay, immature Long-Evans rats (ages not stated) received Benzophenone-3 in powdered feed for 4 d. An increase in uterine weight (weak effect, active at dose of 1525 mg/kg/d) was reported.

The estrogen/antiestrogen and androgen/antiandrogen effects of Benzophenone-3 were evaluated using *Saccharomyces cerevisiae* strains BLYES and BLYAS.<sup>73</sup> Concentration-response curves were fitted by nonlinear regression. In the estrogen assay, an EC<sub>50</sub> (half maximal effective concentration) value of 6.44  $\mu$ M was reported for Benzophenone-3. In the androgen assays, Benzophenone-3 did not increase the bioluminescence of the BLYAS strain. Thus, the androgenicity of Benzophenone-3 was not proven. In anti-estrogen assays, Benzophenone-3 showed a sigmoidal concentration-response curve. In antiandrogen assays, the EC<sub>50</sub> value for Benzophenone-3 was 10.2  $\mu$ M. The results of this study indicate that Benzophenone-3 has estrogenic and anti-androgenic potential.

## Effect on Hematological Parameters

### Benzophenone-2

Benzophenone-2 was also evaluated for its effect on hematological parameters.<sup>101</sup> The test substance was dissolved in a small amount (volume not stated) of ethanol and olive oil and formulated with Hascobase. Benzophenone-2 was then applied to shaved skin at a dose of 100 mg/kg for 4 wk. Dosing with Benzophenone-2 had no effect on the following: leukocyte count, erythrocyte count, platelet count, erythrocyte morphology, and erythrocyte hemoglobin content.

### Cytotoxicity

The cytotoxicity of a sunscreen formulation composed of polymeric nanocapsules loading Benzophenone-3 was evaluated using the L929 fibroblast (murine) cell line.<sup>112</sup> The nanocapsules contained poly( $\epsilon$ -caprolactone), carrot oil, and a non-ionic surfactant. Cell viability was studied using the MTT assay for the assessment of cell metabolic activity. The nanocapsules were seeded at a concentration of 30  $\mu$ g/ml. Non-loaded (blank) and Benzophenone-3-loaded nanocapsules did not exhibit metabolic changes or cell death in the cell culture. Cell viability above 70 wt % was recorded (91.12 wt % for non-loaded and 89.45% for Benzophenone-3-loaded nanocapsules). It was noted that these data indicate that the sunscreen formulation was non-cytotoxic.

### Photoprotective Effect

The photoprotective effect of Benzophenone-3 (in vehicle consisting of isopropyl myristate and SD alcohol) against UVA radiation was evaluated using 30 female Hartley albino guinea pigs.<sup>113</sup> Applications were made to the dorsal lumbar area (depilated skin). The erythema grade increased with increasing concentrations of Benzophenone-3. At the vehicle control site, a mean erythema grade of  $1.5 \pm 0.11$  was reported. Concentrations of 0.1% and 0.3% produced erythema grades greater than 1+, and provided very little photoprotection. Significant photoprotection was noted after the application of 1%, 3%, and 6% solutions ( $p \leq 0.01$ , 0.001, and 0.001, respectively), with erythema grades less than 1+ for the latter two treatments. The 6% solution resulted in greater photoprotection than the 3% solution ( $p \leq 0.001$ ).

### Phototoxicity Mechanism

### Benzophenone-3 and Benzophenone-8

Benzophenone-3 (10  $\mu$ M) significantly increased phosphodiesterase 4B (PDE4B) expression UVB (20 mJ/cm<sup>2</sup>)-irradiated normal human keratinocytes (from neonatal foreskins) in vitro.<sup>114</sup> PDE4B has a well-established role in inflammatory responses in immune cells. Additionally, upon UVB irradiation, Benzophenone-3 upregulated the expression of pro-inflammatory factors such as prostaglandin endoperoxide synthase 2, tumor necrosis factor  $\alpha$ , IL-8, and S100A7. Benzophenone-3 downregulated the level of cornified envelope associated proteins, which are important in the development of the epidermal permeability barrier. Benzophenone-8 (10  $\mu$ M), which shares the 2-hydroxy-methoxyphenyl methanone moiety with Benzophenone-3, also upregulated PDE4B expression in normal human keratinocytes. The Benzophenone-3 and UVB co-stimulation-induced PDE4B upregulation and its association with the upregulation of pro-inflammatory mediators and the downregulation of epidermal differentiation markers were confirmed in a reconstituted three-dimensional human epidermis model. The authors concluded that PDE4B has a role in the mechanism of Benzophenone-3-induced phototoxicity.

## DERMAL IRRITATION AND SENSITIZATION STUDIES

Dermal irritation and sensitization studies summarized below are described in Table 10. (Data from the previous benzophenones reports are not included in the table.)

### Irritation

#### In Vitro

The hen's egg-chorioallantoic membrane test (HET-CAM) was used to evaluate the irritation potential of a sunscreen formulation composed of polymeric nanocapsules loading Benzophenone-3.<sup>112</sup> The nanocapsules contained poly( $\epsilon$ -caprolactone), carrot oil, a non-ionic surfactant, and Benzophenone-3 (0.005 wt%). The formulation was non-irritating to the embryonated hen's egg membrane. The dermal corrosion potential of Benzophenone-4 was determined using a three-dimensional human epidermis model.<sup>7</sup> Approximately 25 mg of solid test article was evenly applied to the apical surface of each tissue. The exposure period for the test article was up to 60 min, and the MTT assay was performed on exposed tissue samples. Benzophenone-4 was considered corrosive to the skin.

#### Animal

*At concentrations up to 16%, Benzophenones-1, -4, and -6 were non- to minimally irritating, and Benzophenone-11 was non-irritating, to rabbit skin.<sup>1</sup> Benzophenone-2 and Benzophenone-3 (both at 100%) were non-irritating to rabbit skin. Benzophenone-9 was non-irritating to rabbit skin at concentrations up to 10.72%. Results from a cumulative skin irritation test indicated that Benzophenone-4 was capable of causing minimal irritation in rabbits at a concentration of 10%.*

A sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was tested in a study involving 24 Wistar albino rats (12 males, 12 females).<sup>69</sup> The formulation (2000 mg/kg) was applied to a 2" x 2", 4-ply gauze pad, and the patch was applied to hairless, dorsal skin for 24 h. There were no signs of erythema or edema. The skin irritation potential of this sunscreen formulation (0.6% to 0.9% Benzophenone-3) was also evaluated using 6 male New Zealand rabbits.<sup>69</sup> The formulation was applied for 72 h to a 25 cm<sup>2</sup> area of dorsal skin, using a 2" x 3", 4-ply gauze pad. There was no evidence of erythema or edema. Benzophenone-8 was evaluated for skin irritation potential using 3 New Zealand white rabbits.<sup>8</sup> The test substance (0.5 g in water (0.5 ml)) was applied to the skin for 4 h using a semi-occlusive patch. Benzophenone-8 was classified as a non-irritant. A skin irritation test on Benzophenone-12 (ground to fine powder) was performed using 3 male New Zealand white rabbits.<sup>5</sup> The test substance was applied (0.5 g, abraded and intact skin of back) for 4 h under an occlusive patch. Benzophenone-12 was classified as non-irritating to the skin.

### **Human**

*Benzophenones-1, -2, -3, and -6 were nonirritating to the skin of human subjects at concentrations up to 16%.<sup>1</sup> Benzophenone-1 and Benzophenone-6 were also nonirritating at a much higher concentration of 100%. Benzophenone-4 was irritating at a concentration of 16% in one test, but nonirritating at concentrations of 5% and 25% in other tests. Benzophenone-11 was also irritating at a concentration of 16%, but nonirritating at 4%, 8%, or 20%. Benzophenone-3 and Benzophenone-12 were nonirritating at a concentration of 25%, but mild to no irritation was observed at a lower concentration of 3% Benzophenone-3. Benzophenone-8 was irritating at a concentration of 25%, but nonirritating at 2%. Benzophenone-9 was non-irritating at concentrations up to 10.72%.*

The frequency of irritant reactions to Benzophenone-4 was studied using 80 subjects.<sup>115</sup> Benzophenone-4 was tested on each subject at concentrations of 2%, 5%, and 10% in petrolatum. Each test concentration of Benzophenone-4 (20 µl) was applied to an 8-mm diameter Finn chamber. Patches were applied for 2 d to the upper back. Benzophenone-4 (5% in petrolatum) induced skin irritation in 4 subjects. Benzophenone-4 (10% in petrolatum) induced skin irritation in 6 subjects.

### **Sensitization**

#### **In Vitro**

The in vitro antioxidant response element (ARE)-nuclear erythroid 2-related factor 2 (Nrf2) Luciferase test method was used to evaluate the skin sensitization potential of Benzophenone-8.<sup>8</sup> The test substance was evaluated at concentrations up to 200 mM in DMSO using the KeratinoSens cell line. Benzophenone-8 was classified as positive in the KeratinoSens assay. The authors stated that further testing is required, having noted that this test is part of a tiered strategy for the evaluation of skin sensitization potential.

#### **Animal**

*Benzophenone-3 was evaluated for skin sensitization potential using the Kligman guinea pig maximization test.<sup>1</sup> Induction involved intradermal injection of 5% Benzophenone-3 in corn oil or 50% Benzophenone-3 in aqueous Freund's Adjuvant. This was followed by challenge with 2.5% Benzophenone-3 in petrolatum. Results were negative.*

The skin sensitization potential of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was tested in a study involving 10 adult male guinea pigs.<sup>69</sup> The formulation was loaded on a 2 cm x 4 cm filter paper that was secured with an occlusive dressing. Observations relating to challenge reactions were assessed after 24 h of the induction, and reactions were scored. The sunscreen formulation was classified as a non-sensitizer. The local lymph node assay was used to evaluate the sensitization potential of Benzophenone-3.<sup>9</sup> Groups of 4 female mice of the CBA strain were used, and the test substance was applied at concentrations of 12.5%, 25%, and 50%. Applications were made to the dorsum of each ear lobe on 3 consecutive days. Benzophenone-3 was classified as a non-sensitizer. The maximization test was used to assess the cutaneous allergenic potential of Benzophenone-12.<sup>116</sup> Ten female albino guinea pigs were tested. The intradermal induction of sensitization in the test group was performed with a 15% dilution of Benzophenone-12. The epidermal induction of sensitization was conducted for 48 h under occlusion with the test substance (at 40% in PEG 300). Two weeks after epidermal injection, the control and test animals were challenged (24 h) with Benzophenone-12 (at 40% in PEG 300). Seven of 9 surviving test animals had sensitization reactions. Benzophenone-12 was evaluated for skin sensitization potential in the maximization test using 20 guinea pigs (10 males, 10 females) of the Pirbright white (Tif:DHP) strain.<sup>5</sup> Benzophenone-12 was applied at a concentration of 5% during the first week of induction, and at a concentration of 30% during the second week. The challenge phase (week 5; i.e., 2 wk after induction) consisted of a single, 24-h application of Benzophenone-12 (20% in petrolatum (w/w)). Results indicated that 65% and 60% of the animals were sensitized to Benzophenone-12 at 24 h and 48 h after challenge, respectively.

#### **Human**

*Benzophenone-1 was non-sensitizing at a concentration of 1% in human subjects.<sup>1</sup> Evidence of fatiguing, possible sensitization at 5%, and no sensitization at 2.5% were noted after testing with Benzophenone-2. Benzophenone-3, Benzophenone-4, and Benzophenone-11 were non-sensitizing at a concentration of 10%. Benzophenone-3 was also non-sensitizing at 3% in one test, but minimum sensitization at this concentration was observed in another test. Benzophenone -4 also did not induce sensitization at a concentration of 5%. Benzophenone-11 was a non-sensitizer at a higher concentration*

of 20%. Benzophenone-8 induced skin sensitization at a concentration of 10%, but not at 2%. At a concentration of 100%, Benzophenone-6 did not induce sensitization.

### **Photosensitization/Phototoxicity**

#### **Animal**

*Benzophenone-8 (3%) and Benzophenone-3 (6%) were non-phototoxic in guinea pigs and rabbits, respectively.<sup>1</sup>*

#### **Human**

*Benzophenone-2, Benzophenone-3, and Benzophenone-4*

*Cosmetic products containing Benzophenones-2, -3, or -4 (0.1% to 3.5%) were evaluated for phototoxicity using human subjects.<sup>1</sup> Products containing Benzophenones-2, -3, and -4 were non-phototoxic in all studies; however, a number of subjects experienced slight irritation (usually a 1 + response) to the test material. Cosmetic products containing up to 3.5% Benzophenone-3 were tested for photoallergenicity potential in human subjects. The products were non-photoallergenic in all studies; however, a number of subjects experienced irritation or sensitization to the test material.*

### **OCULAR IRRITATION STUDIES**

Ocular irritation studies summarized below are described in Table 11. (Data from the previous benzophenones reports are not included in the table.)

#### **In Vitro**

The ocular irritation potential of Benzophenone-4 was evaluated using the MatTek EpiOcular™ model (normal human-derived keratinocytes in the 3-dimensional human tissue model).<sup>7</sup> Tissues were exposed to Benzophenone-4 (solid, 50 mg) for ~ 6 h, and Benzophenone-4 was classified as irritating to the human eye. An ocular irritation study on Benzophenone-8 was performed using the bovine corneal opacity and permeability test.<sup>8</sup> Corneas from 3 animals were exposed to the test substance (20% w/v in paraffin oil) for 4 h, and Benzophenone-8 was not a severe irritant or corrosive agent.

#### **Animal**

*Most of the ocular irritation tests indicated that Benzophenones-1, -2, -3, -6, -9, -11, and -12 were non-irritating to the eyes of rabbits.<sup>1</sup> Some studies indicated that Benzophenones-1, -2, and -4 were slightly to moderately irritating at 100% concentration; however, Benzophenones-1 and -2 were nonirritating when tested at 16% in dimethyl phthalate (DMP) or petrolatum. Although Benzophenone-4 was irritating at concentrations of 8% and 16% in DMP or petrolatum, it was nonirritating when tested as a 5% solution in water. Whereas one study indicated that Benzophenone-11 (5% in DMP) was slightly irritating, another revealed that 16% Benzophenone-11 in DMP was nonirritating.*

The ocular irritation potential of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was studied using 3 adult New Zealand albino rabbits.<sup>69</sup> There were no signs of gross toxicity or adverse effects, and the formulation was classified as practically non-irritating to the eye. Benzophenone-12 (undiluted) was evaluated for ocular irritation potential using 6 New Zealand white rabbits.<sup>5</sup> Test substance (0.1 g) instillation yielded no evidence of ocular irritation.

### **CLINICAL STUDIES**

#### **Retrospective and Multicenter Studies**

The retrospective and multicenter studies summarized below are described in Table 12.

#### **Benzophenone-3**

Patients (age range: 3 to 96 yr) with suspected allergic contact dermatitis were evaluated and then patch tested by 12 North American Contact Dermatitis Group (NACDG) dermatologists with a screening series of 50 allergens.<sup>117</sup> Of the 4094 patients patch tested with 3% Benzophenone-3, 0.5% had allergic reactions. An NACDG study that was performed involved 5800 patients who were patch tested with Benzophenone-3 (3% in petrolatum).<sup>118</sup> The incidence of positive reactions was 0.6%. The relevance of this incidence of positive reactions was classified as follows: 20.6% (definite relevance), 50% (possible relevance) and 2.9% (past relevance). Data from 64 allergenicity studies (between 1992 and 2006) were aggregated and analyzed.<sup>119</sup> This was done in order to evaluate the irritation and sensitization potential of sunscreen products containing Benzophenone-3 at concentrations between 1% and 6%. The mean rate of contact allergy to Benzophenone-3 was 0.07%. A cross-sectional analysis of patients patch tested by the NACDG between 2001 and 2010 was performed.<sup>120</sup> A frequent allergen in sunscreens was Benzophenone-3, whereby 70.2% of the patients (26 of 37 patients patch tested) had an allergic reaction to 10% Benzophenone-3 (in petrolatum) and 64.4% of the patients (56 of 87 patients patch tested) had an allergic reaction to 3% Benzophenone-3 (in petrolatum). NACDG patch testing results from January of 2007 to December of 2008 were reported.<sup>121</sup> Standardized patch testing was used at 13 centers in North America. A total of 5085 patients was tested. Possible allergic reactions to Benzophenone-3 (3% in petrolatum) were observed in 0.9% of the patients.

A 3% aqueous solution of Benzophenone-3 was applied to the midback of 4 patients, using Finn chambers.<sup>122</sup> All four patients were photoallergic to Benzophenone-3. Over a 6-year period, 187 patients (76 males, 111 females) with a history of



photosensitivity were photopatch tested with 18 allergens, using standard techniques.<sup>123</sup> Testing revealed a total of 37 (20%) photocontact reactions. Careful history taking resulted in a diagnosis of clinically relevant photoallergic contact dermatitis in 54% of the 37 patients or 11% (20) of the total tested. Nine of the relevant responses were due to Benzophenone-3 (2% in petrolatum). Patients with positive photopatch tests to sunscreen agents were retrospectively selected from the database of the contact dermatitis clinic at the Skin and Cancer Foundation in Australia.<sup>124</sup> Nine patients had a positive photopatch test reaction to Benzophenone-3 (10% in white petrolatum). Two patients had positive reactions at non-irradiated sites. A study involving 35 patients (11 men, 24 women) was performed in Argentina to determine the proportion of photosensitive patients with photoallergic contact dermatitis to Benzophenone-3.<sup>125</sup> Patients were patch tested with Benzophenone-3 (10% in petroleum jelly). Photoallergic contact dermatitis was identified in 6 patients (17.14%). Five of these patients (14.28%) had at least one positive reaction to Benzophenone-3 in the photocontact test. Over a 7-year period, 355 consecutive patients with suspected photosensitivity were tested at Swedish dermatology clinics.<sup>126</sup> In 28 of the patients (7.9%), a total of 42 allergic reactions was found. The most common allergen was Benzophenone-3 (2% in petrolatum), with 15 photocontact allergic reactions and 1 contact allergic reaction.

#### Benzophenone-4

In a study by the NACDG, 4857 patients were patch tested (years 2013 through 2014), and the positive reaction rate for Benzophenone-4 (10% in petrolatum) was 2.1% (100 allergic reactions).<sup>127</sup> The phototoxicity of Benzophenone-4 was studied using 80 subjects.<sup>115</sup> Benzophenone-4 was tested at concentrations of 2%, 5%, and 10% in petrolatum. One subject had a weak positive reaction (+ reaction), with no concomitant erythema score, to Benzophenone-4 (10% in petrolatum) at the irradiated site.

#### Benzophenone-2, Benzophenone-3, and Benzophenone-4

Twenty-seven patients reported reactions due to sunscreen allergy (itchy bumps and burning).<sup>128</sup> Of these, 11 (10 women, 1 man) patients agreed to photopatch testing. One patient had a delayed-type hypersensitivity photopatch test reaction to Benzophenone-2 (1% in petrolatum), and another patient had a photopatch test reaction to Benzophenone-3 (10% in petrolatum). A retrospective analysis was performed, and involved the reviewing of 1527 charts in the University of British Columbia Contact Dermatitis Clinic patch test database from January of 2009 to July of 2012.<sup>129</sup> Twenty-three of the patients were tested with the sunscreen series at the clinic. Also, all 1527 patients were patch tested with 70 allergens on the NACDG screening series. Benzophenone-3 and Benzophenone-4 were tested at a concentration of 10% in petrolatum. Of the 23 patients tested, 2 had positive reactions (allergic contact dermatitis) to Benzophenone-3 and 1 had a positive reaction to Benzophenone-4. Of the 1527 patients screened (no specific history of sunscreen allergy), 8 patients reacted to Benzophenone-3 in the NACDG series. A total of 5592 patients was patch tested with Benzophenone-4 (10% in petrolatum) in an NACDG study (years 2015 through 2016).<sup>130</sup> Values for the clinical relevance of allergic reactions to 10% Benzophenone-4 (in petrolatum) were: definite relevance (3 of 93 patients (3.2%)), probable relevance (12 of 93 patients (12.9%)), possible relevance (45 of 93 patients (48.4%)), and past relevance (8 of 93 patients (8.6%)). In the same report, 5595 patients were patch tested with Benzophenone-3 (10% in petrolatum). Of the patients patch tested, 24 had an allergic reaction. The British Society for Cutaneous Allergy (BSCA) retrospectively reviewed the results from their facial patch test series over a 2-year period.<sup>131</sup> Of the 1390 patients patch tested with Benzophenone-4 (2% in petrolatum), 0.79% had allergic reactions. Of 4224 patients patch tested with Benzophenone-3 (10% in petrolatum), 0.17% had allergic reactions.

Fifteen patients (4 males, 11 females; mean age = 47.7 years) reacted to sunscreens.<sup>132</sup> Positive patch test (procedure not stated) results were as follows: 4 allergic contact dermatitis reactions to Benzophenone-4, and 2 allergic contact dermatitis and 5 photoallergic contact dermatitis reactions to Benzophenone-3. Four-hundred-two patients (ages not stated) with suspected clinical photosensitivity were patch and photopatch tested with Benzophenone-3 and Benzophenone-4 (each at 10% in petrolatum).<sup>133</sup> Of the 402 patients, there were 3 allergic and 9 photoallergic reactions to Benzophenone-3 and no photoallergic or allergic reactions to Benzophenone-4. Twelve patients with a history of acute eruption on photoexposed areas, induced by ketoprofen or tiaprofenic acid, were patch tested.<sup>134</sup> Photopatch test results were positive for Benzophenone-3 (in 3 of 12 patients) and negative for Benzophenone-4. Photopatch testing (over 2-year period) of Benzophenone-3 and Benzophenone-4 was performed using 1155 patients from 17 centers across the United Kingdom, Ireland, and the Netherlands.<sup>135</sup> Benzophenone-3 (10% in white paraffin) caused photoallergic contact reactions in 27 patients. Benzophenone-4 (5% in white paraffin) and Benzophenone-4 (10% in white paraffin) caused photoallergic contact reactions in 2 and 5 patients, respectively. The following allergic reactions were also reported: 5% Benzophenone-4 (2 patients), 10% Benzophenone-3 (9 patients), and 10% Benzophenone-4 (9 patients). The irritation reactions observed included: 5% Benzophenone-4 (2 patients), 10% Benzophenone-3 (2 patients), and 10% Benzophenone-4 (4 patients).

A study was performed to identify the photoallergens that caused photoallergic contact dermatitis in the population attending an outpatient clinic in Columbia.<sup>136</sup> The study involved 82 patients with a clinical diagnosis of photoallergic contact dermatitis. Benzophenone-3 (concentration not stated) was photoallergenic in 22 of 82 patients (26.8%), and Benzophenone-4 (concentration not stated) was photoallergenic in 2 of 82 patients (2.4%). An investigation of photoallergic contact dermatitis frequency was performed using 347 patients from centers across 12 European countries.<sup>137</sup> Benzophenone-4 (2% in petrolatum) elicited photoallergic contact dermatitis in 3 patients. Allergic contact dermatitis reactions to Benzophenone-3 (10% in petrolatum) were observed in 6 patients. In a retrospective chart review, 160 patients

(37 male, 123 female) underwent photopatch testing in Canada between January of 2001 and December of 2010.<sup>138</sup> Benzophenone-3 induced photoallergic reactions in 12 patients, allergic reactions in 17 patients, and both allergic and photoallergic reactions in 6 patients. Benzophenone-4 caused allergic contact dermatitis in 3 patients, but did not cause photoallergic reactions. A prospective study was performed to evaluate the frequency and causes of photoallergic contact dermatitis among dermatology outpatients.<sup>139</sup> The study involved 1000 consecutive dermatology outpatients in Poland. Photoallergic contact dermatitis was ultimately confirmed in 15 patients: 7 females and 8 males. Of these, 2 patients had a positive reaction to Benzophenone-3 (10% in petrolatum). One patient had a positive reaction to Benzophenone-4 (2% in petrolatum). The photopatch testing of sunscreens was performed in a study involving 157 children (69 male, 88 female).<sup>140</sup> Tests were performed in a single photo-investigation center during years 2000 to 2011. Benzophenone-3 induced photoallergy in 33% of the children.

#### *Benzophenone-3, Benzophenone-4, and Benzophenone-10*

From 1989 to 1991, 214 patients were patch tested to a sunscreen series.<sup>141</sup> Benzophenone-3 and Benzophenone-10 accounted for 27 and 8 positive patch tests, respectively. Over a period of 3 years, 553 patients were patch tested (Finn chambers) with 10% Benzophenone-3, 10% Benzophenone-4, and 10% Benzophenone-10.<sup>142</sup> Thirteen patients and 1 patient had positive reactions to 10% Benzophenone-3 and 10% Benzophenone-10, respectively. Thirteen patients had positive reactions to 10% Benzophenone-4. One patient had a positive reaction to both Benzophenone-3 and Benzophenone-4. A retrospective analysis of positive photopatch test episodes (years 1993 through 1998 in London) was undertaken using results retrieved from the environmental dermatology database, and further verified with the original archived patch test documentation for each individual patient.<sup>143</sup> In 111 patients with positive reactions (4.1%), there were 155 allergic contact or photoallergic reactions to allergens in the photopatch series. The most common UV filter photoallergen was Benzophenone-3 (14 positive results), followed by Benzophenone-10 (9 positive results). Forty-nine patients (1.8%) had a total of 75 allergic contact reactions, 51 due to UV filters. Benzophenone-10 accounted for 13 allergic contact reactions, and Benzophenone-3 accounted for 8 allergic contact reactions.

A study was conducted to determine the threshold UVA elicitation dose in photopatch testing. Twenty-three patients with a variety of photosensitive disorders were patch and photopatch tested.<sup>144</sup> Benzophenone-3 and Benzophenone-10 produced positive responses. Seven patients with ketoprofen-induced photodermatitis were patch tested and photopatch tested with Benzophenone-3, Benzophenone-4, and Benzophenone-10 (test concentrations not stated).<sup>145</sup> All non-irradiated patch test results for the three benzophenones were negative. Four and 2 patients had positive UVA photopatch tests to Benzophenone-3 and Benzophenone-10, respectively. Photopatch test results for Benzophenone-4 were negative. From February 1985 to March 1987, 280 patients with photosensitivity and other patients suspected of sunscreen dermatitis were patch and photopatch tested with a series of contact allergens and photoallergens (test concentration = 2% in petrolatum).<sup>146</sup> During the first 16 months of the study period (February 1985 to May 1986), there were 2 patients who were allergic to Benzophenone-10. In the remaining 10 months, 4 patients were allergic to Benzophenone-10. Photopatch results for Benzophenone-10 were negative.

### **Case Reports**

The case reports summarized below are described in Table 13.

#### *Benzophenone-2*

Epicutaneous tests were performed on two patients (both with itching erythema) who had been using nail varnish and nail varnish remover and one patient who had artificial nails (itching erythema at perionychium of several fingers; also marked erythema and edema).<sup>147</sup> The three patients had sensitization reactions to Benzophenone-2, an allergen in nail varnish remover. Symptoms and skin changes disappeared when use of this product was discontinued. A male patient presented with subacute chest and arm eczema after use of a toilet water product.<sup>148</sup> Patch testing with an ingredient of the product, Benzophenone-2 (2% in petrolatum), yielded a positive reaction (++). Reactions were not observed in 15 control subjects. Severe dermatitis (worsened after sun exposure) was observed in a female patient.<sup>149</sup> Patch test results for Benzophenone-2 (1% in petrolatum) were positive (+++ reaction).

#### *Benzophenone-3*

Erythema and blistering (at application) were observed after a female patient applied ketoprofen gel topically to the right popliteal fossa and right shoulder.<sup>150</sup> Patch test results for Benzophenone-3 were negative; however, a positive photopatch test reaction to Benzophenone-3 (+++) was reported on day 4. A female patient who applied a sunscreen experienced itching and a burning sensation of the nose, cheeks, and dorsa of the hands after 3 h of direct sun exposure.<sup>151</sup> Patch testing with an ingredient of the sunscreen, Benzophenone-3 (2% in petrolatum), yielded a +++ reaction. Anaphylaxis (with generalized cutaneous wheal and flare reaction) was observed in a female patient after widespread application of a sunscreen to the skin.<sup>152</sup> Blinded patch testing with Benzophenone-3 (sunscreen ingredient, concentration not stated) induced a wheal and flare reaction after 15 min. Non-blinded patch tests for Benzophenone-3 in 2 control subjects yielded negative results. In prick tests, results for the sunscreen and Benzophenone-3 were positive.

An acute, itchy rash was observed on a female patient (face, trunk, and limbs) after application of a sunscreen to her daughter's skin.<sup>153</sup> The patient was patch tested with Benzophenone-3 (concentration not stated), and an acute urticarial wheal and flare reaction was observed. Patch test results for Benzophenone-3 in 5 control subjects were negative. In another case report, a male patient with dermatitis was patch tested with Benzophenone-3 (3% in petrolatum).<sup>154</sup> The patient had a strong patch test reaction at 48 h and 96 h. A female patient experienced an anaphylactic reaction 15 min after applying a sunscreen all over her body.<sup>155</sup> Generalized wheals were observed. Patch testing with Benzophenone-3 (10% in petrolatum) resulted in an urticarial reaction at the test site. The results of an assay for detection of IgE to Benzophenone-3 were negative.

#### Benzophenone-3 and Benzophenone-4

Persisting erythema on light-exposed skin was reported in the history of a male patient who had applied sunscreen on several occasions.<sup>156</sup> Photopatch test results were negative for Benzophenone-4. Photopatch test results for Benzophenone-3 were positive (+++) at 72 h. Hand dermatitis was observed in a female hairdresser over a 2-year period.<sup>157</sup> Patch testing with Benzophenone-4 (10% in petrolatum) yielded a positive reaction, but patch test results for Benzophenone-3 were negative. A female patient presented with a 2- to 3-year history of intermittent burning and pruritic facial eczema.<sup>158</sup> Test results were significant for a 2+ photocontact reaction to Benzophenone-3. A questionable photocontact reaction to Benzophenone-4 was reported. There was no reaction to Benzophenone-3 when the site was not irradiated. Immediately after irradiation, urticaria at the Benzophenone-3 photopatch test site was observed. Another case involved a female patient with a 1-year history of perioral itching and erythema, and a 3-d history of erythematous swelling over her face and front of her neck.<sup>158</sup> The patient had a 1+ reaction to Benzophenone-3 at both patch and photopatch test sites. A case of acute facial swelling in a diver has been reported.<sup>159</sup> Subsequent patch testing (standard test) for contact dermatitis yielded a positive reaction to Benzophenone-4 (concentration not stated).

#### Benzophenone-3, Benzophenone-4, Benzophenone-8, and Benzophenone-10

A female patient presented with eyelid dermatitis for 1 year and facial dermatitis for two months.<sup>160</sup> Patch test were as follows: Benzophenone-3 (++), Benzophenone-4 (+), and Benzophenone-10 (negative results). Face eczema developed in a female patient after use of a cosmetic cream.<sup>161</sup> For Benzophenone-3, positive patch test (++) reaction and photopatch test (+++ reaction) reactions were reported. For Benzophenone-10, patch test results were negative, but photopatch test results were positive (+++ reaction). A female patient was referred for phototesting and patch testing after recurrent episodes of dermatitis and systemic symptoms.<sup>162</sup> Urticarial reactions to Benzophenone-3, Benzophenone-8, and Benzophenone-10 at test sites were observed. Because of the severe reactions, UVA irradiation was not completed.

### **Other Clinical Reports**

Other clinical reports summarized below are described in Table 14.

*Benzophenone-3 (2% to 10%), Benzophenone-4 (1 % to 10%), Benzophenone-8 (2% to 10%), and Benzophenone-10 (0.5% to 10%) have been tested for sunscreen efficacy in large populations of human subjects, and under various sources of UV radiation.<sup>1</sup> In all tests combined, there were no reports of irritancy or phototoxic reaction to these ingredients.*

A study was performed to identify association between exposure to potentially endocrine-activating chemicals and the age of menarche in adolescent girls.<sup>163</sup> Data from 1598 participants who had completed the reproductive health questionnaire and laboratory examination for the Centers for Disease Control and Prevention's National Health and Nutrition Examination Survey (NHANES) for years 2003 to 2008 were used. The weighted mean age of menarche was 12 years of age, indicating that exposure to Benzophenone-3 was not significantly associated with the age of menarche. The association of Benzophenone-3 with serum total testosterone levels was examined using child and adolescent participants (588 total) in NHANES (2011–2012).<sup>164</sup> Multivariable linear regression was performed to estimate associations between natural log-transformed serum testosterone and quartiles of urinary Benzophenone-3 in male and female children and adolescents. The values for urinary Benzophenone-3 (free or total not specified) in the quartiles were: male children (15.57 ng/ml), male adolescents (20.03 ng/ml), female children (18.31 ng/ml), and female adolescents (35.59 ng/ml). There were no significant associations between testosterone and Benzophenone-3 in male or female children, and no evidence of consistent trends with increasing quartiles of exposure. The influence of Benzophenone-3 and other chemicals on the age of menarche in 200 girls was studied.<sup>165</sup> A log w/v increase in childhood (pre-pubertal) urinary levels of Benzophenone-3 was associated with decreased time to menarche. The influence of Benzophenone-3 and other chemicals on the age of menarche in 200 girls was studied.<sup>165</sup> A log w/v increase in childhood (pre-pubertal) urinary levels of Benzophenone-3 was associated with decreased time to menarche.

The association between maternal urinary phenol concentrations during pregnancy and fetal growth was studied in a population of 476 mothers who had participated in a birth cohort between 2006 and 2008.<sup>166</sup> An association between urinary Benzophenone-3 and lower abdominal circumference in males was made. A study (cohort of 922 pregnant women) was performed to study the association between prenatal exposure to Benzophenone-3 and gestation age and birth weight.<sup>167</sup> Average Benzophenone-3 urinary concentrations were associated with an increase in gestational age. A study (338 children) for determining an association between urinary phthalates, parabens, and phenols found in personal care products with pubertal timing in girls and boys was performed.<sup>168</sup> No such association relating to urinary Benzophenone-3 was found.

Placental weights and birth weights were available for 473 mother-son pairs in a cohort for whom Benzophenone-3 was measured in spot urine samples.<sup>169</sup> A positive association between urinary Benzophenone-3 and both placental weight and child birth weight was observed. A study was performed to examine whether maternal and paternal preconception urinary concentrations of Benzophenone-3 (e.g., from dietary and personal care product exposure) and other chemicals were associated with the risk of preterm birth among couples attending fertility care.<sup>170</sup> This study included 417 female and 229 male participants in the Environmental and Reproductive Health (EARTH) study who gave birth to 418 singleton infants between 2005 and 2018. No consistent pattern of association was observed for Benzophenone-3 in either parent.

The photoallergenicity of Benzophenone-4 (10% in petrolatum) and Benzophenone-10 (10% in petrolatum) was evaluated using 15 eczematous dermatitis patients.<sup>171</sup> There were no positive reactions to Benzophenone-4 (10% in petrolatum). Three subjects had positive reactions to Benzophenone-10 (10% in petrolatum).

### **EPIDEMIOLOGICAL STUDIES**

The epidemiological studies summarized below are described in Table 15.

A case-control study on idiopathic male infertility and exposure to phenols in the environment was performed.<sup>172</sup> The study involved 877 idiopathic infertile men and 713 fertile controls. There was no evidence for an association between exposure to Benzophenone-3 and idiopathic male infertility. Urinary levels of Benzophenone-3 and the incidence of Hirschsprung's disease were investigated using a total of 423 patients in China.<sup>173</sup> Results indicated a positive association between women identified with medium to high levels of Benzophenone-3 (maximum detection level = 22,800 ppb) in the urine and the incidence of Hirschsprung's disease. A calculation relating to the concentration of Benzophenone-3 in the blood after a 4-h application of a sunscreen product containing 6% Benzophenone-3 is presented at the end of the section on Absorption, Distribution, Metabolism, and Excretion – Human.<sup>52</sup> In this publication, the authors noted that since the embryonic period of neural crest cell migration associated with Hirschsprung's disease does not occur until weeks 5-12 of pregnancy, women can unintentionally expose their fetus to extremely high levels of Benzophenone-3 over time. They noted that the analysis of human exposure levels to Benzophenone-3 from sunscreen use, under normal conditions, demonstrates that enough Benzophenone-3 can cross into the mother's blood, making it available to the fetus at high enough levels that can inhibit migration of neural crest cells during critical embryonic development.

A total of 413 men provided urine and semen samples (years 2005 to 2009), and the relationship between urinary concentrations of benzophenones and semen quality was studied.<sup>174</sup> The following benzophenones were quantified in the urine: Benzophenone-1, Benzophenone-2, Benzophenone-3, and Benzophenone-8. Benzophenone-2 and Benzophenone-8 were associated with changes in semen endpoints, including sperm concentration, sperm viability, motility, sperm head, and morphology. No associations were observed for Benzophenone-1 or Benzophenone-3. A study (215 university students) was performed to examine associations between urinary concentrations of benzophenone-type UV filters and semen quality and reproductive hormone levels.<sup>175</sup> Urinary concentrations of the following benzophenones were measured: Benzophenone-1, Benzophenone-2, Benzophenone-3, and Benzophenone-8. Results were as follows: statistically significant positive association between urinary Benzophenone-1 and Benzophenone-3 concentrations and serum follicle stimulating hormone (FSH) levels; urinary Benzophenone-1 concentration statistically significantly positively associated with testosterone(T)/E2; and urinary Benzophenone-1 concentration negatively associated with inhibin B/FSH ratio.

### **RISK ASSESSMENT**

#### **Dermal**

##### **Benzophenone-3**

Results from a risk assessment on Benzophenone-3 exposure indicated margin of safety (MOS) values of 42 for whole body sunscreen treatment twice per day over 6 h, and 1307 for face sunscreen treatment twice per day over 6 h.<sup>24</sup> The MOS values are based on a NOAEL of 200 mg/kg/day. The authors noted that a MOS of >100 is considered acceptable. Regarding the lower MOS value, the authors noted that if personal care products containing Benzophenone-3 at the maximum concentration authorized in the European Union and Australia (10%) would be applied on the total area of the human body (0.5 mg/cm<sup>2</sup> twice daily for 6 h), the MOS value of 42 indicates a possible health risk.

The daily systemic exposure dose and MOS for UV filters was estimated by in vitro permeation studies for the 6-h skin exposure of the face or the whole body in humans to a sunscreen, defined as a silicone-based oil-in-water emulsion containing 10% Benzophenone-3 and 5% ethylhexyl triazone.<sup>176</sup> Three in vitro experiments were performed using a full-thickness porcine-ear skin mimicking in-use conditions. Ear skin was obtained from pigs that were approximately 6 months old, and the skin disc was mounted in the diffusion cell. In the first experiment, the sunscreen was spread uniformly onto the diffusion area (2 cm<sup>2</sup>), and the exact sunscreen dose was 1 mg/cm<sup>2</sup>. This yielded a Benzophenone-3 dose of 100 µg/cm<sup>2</sup> during the 6-h exposure. The receptor chamber was filled with phosphate buffered saline. The second experiment involved a 3-h reapplication (100 µg/cm<sup>2</sup> Benzophenone-3) of the sunscreen to intact skin containing the 100 µg/cm<sup>2</sup> Benzophenone-3 dose (total dose = 200 µg/cm<sup>2</sup> Benzophenone-3). The procedure for the third experiment was the same as in first, except that freshly shaved skin was exposed. The estimated systemic exposure dose of Benzophenone-3 after sunscreen application (at 1 mg/cm<sup>2</sup>) for 6 h to the face and whole-body skin was estimated to be 136 mg/cm<sup>2</sup> and 30 mg/cm<sup>2</sup>, respectively. Skin shaving

increased Benzophenone-3 bioavailability by 1.38-fold. MOS values were estimated according to guidelines applicable for the European Union. For 3 realistic exposure scenarios, MOS values of 48, 34, and 34 for Benzophenone-3 in sunscreen applied to the whole-body indicated some concerns regarding safety for consumers (MOS < 100).

The following safety evaluation (including calculation of the MOS) of Benzophenone-3 was performed by the Scientific Committee on Consumer Products (SCCP).<sup>177</sup>

### **Benzophenone-3 as a UV-filter in sunscreens up to 6%**

Dermal absorption (6% formulation):	9.9% [mean (3.1%) + 2 SD (2 x 3.4%)]
Applied dose (suntan):	18 g/d
Typical human bw:	60 kg
No observed effect level NOAEL (oral teratogenicity-rat):	200 mg/kg/d

$$\begin{aligned} \text{Systemic exposure dose (SED)} &= 18.10^3 \text{ mg/d} \times 6/100 \times 9.9/100/60 \text{ kg} \\ &= 1.78 \text{ mg/kg bw/d} \end{aligned}$$

$$\text{MoS} = \text{NOAEL}/(\text{SED}) = 112$$

### **Benzophenone-3 as a UV-filter in cosmetics at 0.5% to protect formulations against sunlight**

Dermal absorption (2% formulation):	8.0% [mean (4.0%) + 2 SD (2 x 2.0%)]
Applied dose (all cosmetic products):	17.79 g/d
Typical human bw:	60 kg
No observed effect level NOAEL (teratogenicity-rat):	200 mg/kg bw/d

$$\begin{aligned} \text{Systemic exposure dose (SED)} &= (17.79.10^3 \text{ mg/d} \times 0.5/100 \times 8.0/100)/60 \text{ kg} \\ &= 0.119 \text{ mg/kg bw/d} \end{aligned}$$

$$\text{MoS} = \text{NOAEL}/\text{SED} = 1686$$

SCCP's opinion on the safety of Benzophenone-3 is stated as follows: SCCP is of the opinion that the use of Benzophenone-3 as a UV-filter up to 6% in cosmetic sunscreen products and up to 0.5% in all types of cosmetic products to protect the formulation does not pose a risk to the health of the consumer, apart from its contact allergenic and photoallergenic potential.

### **SUMMARY**

The safety in cosmetics of Benzophenones-1 to -12 (with the exception of Benzophenone-7) is reviewed in this report; these ingredients are substituted derivatives of a 2-hydroxybenzophenone. These ingredients are reported to function mainly as light stabilizers in cosmetics, but some are also reported to function as sunscreens. In the US, sunscreens are active ingredients in over-the-counter (OTC) drug products, and are not cosmetic ingredients; however, in Europe, sunscreens are classified as cosmetics. All of the benzophenones in this report are soluble in organic solvents. Solubility in water varies from insoluble to soluble (Benzophenone-4).

Substantial changes in ingredient use frequencies are apparent when data from 1983 and 2021 are compared. For example, the use frequency of Benzophenone-2 (299 uses total), which was the highest use frequency reported in the 1983 CIR final report on benzophenones, decreased to a value of 55 in 2021. The use frequency of Benzophenone-4 (240 uses) in the 1983 report increased substantially to a value of 1226 in 2021. Changes in use concentrations are also apparent. Of the ingredients reviewed in the 1983 report, Benzophenone-4 had the highest use concentration ( $\leq 10\%$  in suntan gels, creams and liquids (leave-on products)). In 2020, Benzophenone-4 is the benzophenone with the highest reported use concentration, and is being used at substantially lower concentrations of up to 1.6% in other non-coloring hair preparations (leave-on products).

According to the US FDA proposed rule (no longer in effect) issued in 2007, the following benzophenones were allowed in sunscreens as active ingredients within the concentration specified for each ingredient: Benzophenone-3 (a.k.a. oxybenzone, up to 6%), Benzophenone-4 (a.k.a. sulisobenzone, up to 10%), and Benzophenone-8 (a.k.a. dioxybenzone, up to 3%). In 2019, FDA issued a new proposed rule stating that there are insufficient data for determining that these 3 ingredients are GRASE in OTC sunscreen drug products.

In an in vitro skin penetration study using excised human epidermis, Benzophenone-3 passed through the skin in significant amounts (0.08 g/m<sup>2</sup> or 10% of applied dose). Results from another in vitro study (human skin) indicated that Benzophenone-3 penetrated very quickly in less than 30 min, and that there was no difference in the mean quantity in the

stratum corneum at 30 min versus 16 h. For Benzophenone-4, the quantity in the stratum corneum at 30 min was statistically significantly lower at 30 min than at 16 h.

In rats, Benzophenone-2 was detected in the blood, liver, adipose tissue, and in the brain after application to the skin. Metabolism to its sulfate and glucuronide forms was also reported. Results from another rat study indicate that Benzophenone-3 was also detected in the plasma, liver, and brain after application to the skin, and that Benzophenone-1 was the main metabolite.

After application of Benzophenone-3 (in solution/cream) to the skin of human subjects, it was detected in the stratum corneum and was excreted in the urine. After dermal application of a sunscreen lotion containing Benzophenone-3 to human subjects, Benzophenone-3 was detected in the stratum corneum, but not in the plasma or urine. In another study, a sunscreen containing Benzophenone-3 was applied to human subjects. Some sites were irradiated, whereas others were not. Benzophenone-3 was absorbed and excreted in the urine. Sunscreen application has also resulted in the presence of Benzophenone-3 and the following metabolites in the urine: Benzophenone-1, 2,3,4-trihydroxybenzophenone, and 2,2'-dihydroxymethoxybenzophenone. Other studies have also supported the absorption and excretion of Benzophenone-3 after dermal application. Benzophenone-4 was also detected in the stratum corneum of human subjects after dermal application.

In vitro toxicokinetic studies were performed using human and in vitro (whole zebrafish embryos) cell models. Benzophenone-2 was metabolized into a variety of gluco- and sulfo-conjugated metabolites. When Benzophenone-3 was incubated with rat liver microsomes in the presence of NADPH, the metabolites formed were 2,5-dihydroxy-4-methoxybenzophenone and Benzophenone-1. In a similar experiment, the following Benzophenone-3 metabolites were formed: Benzophenone-1; 2,4,5-trihydroxybenzophenone; 3-hydroxylated benzophenone-3; 5-hydroxylated benzophenone-3; and 2,3,4-trihydroxybenzophenone. In the presence of human liver microsomes and NADPH, Benzophenone-3 was metabolized to Benzophenone-1 and 5-hydroxylated benzophenone-3. Metabolic patterns in the zebrafish models and human hepatic cell line HepaRG shared many similarities, while biotransformation rates in the cell lines MELN (human female cancer (invasive ductal carcinoma) cell line) and T47D-KBLuc (human female cancer (mammary gland breast/duct) cell line) were quantitatively low and qualitatively different.

In a dermal metabolism and disposition study on [<sup>14</sup>C]Benzophenone-3 involving rats, the absorbed dose was excreted mainly in the urine and feces, with ~3% to 10% of the absorbed dose remaining in the tissues.

When administered orally (gavage) to rats, Benzophenone-2 was metabolized to glucuronide- and sulfate-conjugates. It was suggested that this biotransformation occurs in a first-pass effect in the gut wall or the liver. Following the oral dosing (in corn oil) of rats with Benzophenone-3, it was converted to Benzophenone-1, which was converted to 2,3,4-trihydroxybenzophenone. Benzophenone-3 was also metabolized to 2,2' dihydroxy-4-methoxybenzophenone. In an oral (gavage) metabolism and disposition study involving rats and mice, overall, [<sup>14</sup>C]Benzophenone-3 was well-absorbed and excreted mainly in the urine. The distribution of Benzophenone-3 in tissues was minimal in rats and mice, and urinary metabolites included: benzophenone-3 glucuronide, Benzophenone-1, benzophenone-1-glucuronide, and benzophenone-1 sulfates. Novel minor dihydroxy metabolites, including 2,5-dihydroxy-4-methoxybenzophenone, were also detected. Results from an oral dosing (dietary) study on Benzophenone-12 involving rats indicated metabolism to its glucuronide conjugate, and that Benzophenone-12 had no bioaccumulation potential.

In human biomonitoring studies, Benzophenones-1, -2, -3, -4, and -8 have been detected in the urine of subjects who had not been dosed with either benzophenone. A metabolite of Benzophenones-1 and -3 (4-hydroxybenzophenone), but not Benzophenone-3, was detected in a study in which human placental samples were evaluated. In other studies, Benzophenone-3 has been detected in amniotic fluid, cord blood, breast milk, adipose tissue, and brain white matter. Furthermore, biomonitoring studies have indicated that Benzophenone-1 is a major metabolite of Benzophenone-3, and that the presence of Benzophenone-3 derivatives in the urine suggests that demethylation was the major route of Benzophenone-3 metabolism.

In an acute dermal toxicity study (rats) on a sunscreen formulation containing 0.6% to 0.9% Benzophenone-3, and LD<sub>50</sub> of > 2000 mg/kg was reported. In a similar study on Benzophenone-12 involving rabbits, the LD<sub>50</sub> was > 10,000 mg/kg.

After oral dosing (method not stated), Benzophenone-1 was classified as practically non-toxic (LD<sub>50</sub> = 8600 mg/kg) in rats. The acute oral (gavage) LD<sub>50</sub> (rats) for a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was > 2000 mg/kg. An acute oral (gavage) LD<sub>50</sub> of 3530 mg/kg for Benzophenone-4 was reported in a study involving rats. Acute oral (gavage) dosing of rats with Benzophenone-8 resulted in an LD<sub>50</sub> of > 2000 mg/kg. An LD<sub>50</sub> of > 10,000 mg/kg was reported for rats dosed orally (in water) with Benzophenone-12.

In a short-term (2 wk) oral (diet) toxicity study involving B6C3F<sub>1</sub> mice, the NOAEL for microscopic lesions was 6250 ppm. The same NOAEL for microscopic lesions was reported in a short-term (2 wk) oral toxicity study involving groups of 10 F344/N rats. In a short-term oral (gavage) toxicity study, groups of 26 Wistar rats were dosed orally with Benzophenone-4 at 2 wk prior to mating and 48 d thereafter. Female rats were dosed orally for a total of 66 d. A NOAEL of 1250 mg/kg/d was reported for males and females. Groups of 6 male rats of the Carworth Farms Elias strain were fed Benzophenone-12 in the diet for 35 d. No significant gross lesions were observed. Repeated oral (gavage) dosing of groups of 24 Wistar rats with Benzophenone-12 (0.5% carboxymethylcellulose suspension in drinking water) during a pre-mating period (10 wk for males;

2 wk for females), a 2-wk mating period, and up to 30 d of lactation, a NOAEL of 1000 mg/kg/d for general systemic toxicity was determined.

In a 2-wk dermal toxicity study involving groups of 10 B6C3F<sub>1</sub> mice, dosed topically with Benzophenone-3 (0.5 to 8 mg in alcohol or lotion vehicle), minimal effects (variable increases in liver weight) were reported. In another 2-wk study, groups of 10 F344/N rats received topical applications of Benzophenone-3 (1.25 to 20 mg in alcohol or lotion vehicle). Minimal effects (small and variable increases in liver and kidney weights) were observed. The findings reached statistical significance in the higher dose groups.

Benzophenone-3 (in ointment base, 100 mg/kg) was non-toxic when applied to the skin of groups of 4 to 6 male Sprague-Dawley rats twice daily for 4 wk. In another study, mated female Sprague-Dawley rats received dermal applications of Benzophenone-3 (10% in cream; dose = 100 mg/kg) during the prenatal period and adulthood. Their male offspring subsequently received dermal applications from 43 to 56 d of age. No adverse effects on pregnant females or on the offspring were noted.

In a 90-d oral study (dosing method not stated) involving rats (number and strain not stated), a NOAEL of 236 ppm/d was reported for Benzophenone-1. In a 13-wk oral toxicity study involving groups of 20 B6C3F<sub>1</sub> mice, a NOAEL of 6250 ppm was reported for Benzophenone-3. When groups of 20 F344/N rats were fed Benzophenone-3 in the diet in this study, the same NOAEL was reported. In another study, groups of 20 Sprague-Dawley rats received 10,000 ppm Benzophenone-3 in the diet for 14 wk. In males, the absolute and relative liver and kidney weights were increased relative to the control group. In females, the absolute kidney weight was significantly decreased, but the relative liver weight was significantly increased relative to the control group.

The embryotoxicity of Benzophenone-3 was evaluated in an in vitro test involving zebrafish embryos. Malformation of the somites was observed at concentrations of 52.6 and 78.9 µM. The number of hatched embryos at 96 h post-fertilization was also decreased.

Pregnant mice were exposed dermally to Benzophenone-3 (50 mg/kg/d) from GD 0 to 6. Dermal exposure resulted in an intrauterine growth restriction (IUGR) phenotype, disturbed sex ratio, and alterations in the growth curve of the offspring. In a 13-wk dermal dosing study on Benzophenone-3 involving groups of 20 B6C3F<sub>1</sub> mice, it was not possible to establish a NOAEL for decreased epidermal sperm density due to this effect at doses up to the highest dose of 364 mg/kg.

In a developmental toxicity study involving groups of 5 pregnant C57BL/6NCr mice, oral dosing (gavage) with Benzophenone-2 (6.25 mg) on GD 12 through 17, eight of 57 male fetuses had hypospadias ( $p = 0.0064$ ). In a continuous breeding study involving Swiss CD-1 mice, the animals were fed Benzophenone-3 at concentrations up to 5% during a 7-d pre-cohabitation period and a 98-d cohabitation period. Minimal effects on fertility and reproduction were observed. From pregnancy (day 0) to the day before weaning (lactational day 21), mated BALB/c female mice were dosed orally with Benzophenone-3 (in tocopherol-stripped corn oil) at doses of 30, 212, and 3000 µg/kg/d. The offspring (no less than 9 litters per dose) were exposed in utero and during the first 21 d of postnatal life. Study results suggested that even low doses of Benzophenone-3 can disrupt hormone sensitive organs during critical windows of development.

In an oral dosing (method not stated) study, the reproductive toxicity of Benzophenone-1 was evaluated using female rats (number and strain not stated). After 3 d of dosing, a NOAEL of 10 mg/kg/d was reported. The oral dosing of groups of 5 Sprague-Dawley rats with Benzophenone-2 for 5 d caused a statistically significant increase in mean uterine weight at the 2 highest doses of 33 mg/kg and 1000 mg/kg. The same effect for Benzophenone-2 was observed in a study (same protocol) involving groups of ovariectomized rats of the same strain. In groups of 25 mated Wistar rats of the Crl:WI (Han) strain, Benzophenone-3 (in corn oil) was administered orally at doses of 40, 200, and 1000 mg/kg/d on days 6 through 19 post-coitum. The NOAEL for Benzophenone-3 was 200 mg/kg/d. Groups of 25 pregnant Sprague-Dawley rats were fed low-phytoestrogen chow containing 3000 or 30,000 mg/kg Benzophenone-3 from GD 6 until postnatal day 21. The higher dose caused statistically significantly lower weights of the paired-testis, paired-epididymis, and prostate. There were no changes in the relative weights of the paired epididymis and prostate in either exposure group. There also were no differences in seminal vesicle weight. Groups (7 to 8 animals per group) of mated female Sprague-Dawley rats were fed dietary concentrations up to 50,000 mg/kg Benzophenone-3 (in low-phytoestrogen chow) from GD 6 until weaning on postnatal day 23. There were no statistically significant differences in the following: mean number of implantation sites/litter, mean resorptions per litter, % litters with resorptions, number and weights of live fetuses, or sex ratios between the control and Benzophenone-3 dose groups.

On GD 6, groups of 42, 35, 35, and 43 F<sub>0</sub> time-mated female rats were fed diets containing 0, 1,000, 3,000, and 10,000 ppm Benzophenone-3, respectively, for 39 d. Dietary concentrations of 1000, 3000, and 10,000 ppm Benzophenone-3 resulted in average daily doses of approximately 70, 206, and 660 mg Benzophenone-3/kg bw/d during gestation, and 157, 478, and 1609 mg/kg/d over lactation days 1 – 14. Groups of 50 (1,000 and 3,000 ppm) or 60 (0 and 10,000 ppm) F<sub>1</sub> rats per sex continued on study after weaning, and were fed diets containing the same exposure concentrations for 105 wk. Benzophenone-3 had no effects on the percentage of mated females producing pups, litter size, pup sex distribution, or numbers of male or female pups. In a 13-wk oral dosing study, F344/N rats (10 males and 10 females per group) received

diets containing 0, 3125, 6250, 12500, 25000, or 50000 mg/kg Benzophenone-3. At 50,000 mg/kg Benzophenone-3, markedly lower epididymal sperm density and an increase in the length of the estrous cycle were observed.

In a study involving groups of 26 Wistar rats (13 males, 13 females/group), Benzophenone-4 was administered orally (in corn oil, by gavage) at doses of 750, 1000, and 1250 mg/kg/d. The NOAEL (reproductive toxicity) for Benzophenone-4 was 1250 mg/kg/d.

Benzophenone-12 (in 0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80) was administered orally to groups of Wistar rats (F<sub>0</sub> animals: 12 males, 12 females/group) at doses of 100, 300, and 1000 mg/kg/d. The duration of treatment was described as follows: 10-wk pre-mating period (males), 2-wk pre-mating period (females), 2-wk mating period (both sexes), ~2 d post-mating (males), entire gestation period, up to 30 d of lactation (corresponding to 21 d of lactation and up to 9 d post-weaning), and 35 d post-mating (for sperm-negative females). The NOAEL for reproductive performance and fertility of the F<sub>0</sub> parental rats and developmental toxicity in the offspring was 1000 mg/kg/d. The same NOAEL was reported in another study in which Benzophenone-12 (in 0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80) was administered orally at doses of 100, 300, and 1000 mg/kg/d using groups of 50 Wistar rats (25 males, 25 females). The groups were dosed daily, from implantation to one day prior to the expected day of parturition (GD 6 to 19).

Six pregnant albino Swiss mice were injected s.c. with Benzophenone-3 (in peanut oil, 50 mg/kg) once daily for 10 d (from the 7<sup>th</sup> to 16<sup>th</sup> day of gestation). Dosing resulted in severe apoptosis and neurotoxicity in neocortical neurons. Thus, Benzophenone-3 can pass through the placenta and blood-brain barriers.

In an in vitro genotoxicity test, micronuclei formation was detected in human keratinocytes treated with Benzophenone-1 (10 µg/ml) in the presence of UVB. In a photogenotoxicity test involving human keratinocytes, Benzophenone-1 photosensitized and generated reactive oxygen species in the presence of sunlight/UV radiation. The in vitro luminescent *umu* test was used to evaluate the genotoxicity of Benzophenone-1, -3, -6, and -8 (doses up to 10 µg/well) in *Salmonella typhimurium* strain TL210. Positive results were reported for Benzophenone-3.

The genotoxicity of Benzophenone-1 (doses up to 600 µg/plate), Benzophenone-3 (up to 200 µg/plate), Benzophenone-6 (up to 2000 µg/plate), and Benzophenone-8 (up to 300 µg/plate) was evaluated in the Ames test using *S. typhimurium* strains TA98 and TA100 (with and without metabolic activation). Results were negative for each benzophenone tested. The genotoxicity of Benzophenone-3 and Benzophenone-8 (each in seawater, 1:10 or 1:1000) was evaluated at doses of 4 to 10 µl per plate using *S. typhimurium* strain TA98 (without metabolic activation). Only Benzophenone-8 (1:10) had clear genotoxic activity that was dose-related (doses of 4, 6, 8, and 10 µl). In another Ames test, a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was not genotoxic in the following *S. typhimurium* strains at a dose of 5000 µg/plate: TA 98, TA100, TA1535 and TA1538. Benzophenone-3 was also evaluated for genotoxicity at doses up to 6000 µg/plate (with and without metabolic activation) using *S. typhimurium* strains TA98 and TA100, and *E. coli* strain uvrA pKM101. Results were negative with and without metabolic activation.

The cytogenetic effect of Benzophenone-3 on human peripheral lymphocytes was evaluated using in vitro chromosomal aberrations and micronuclei assays. Lymphocyte cultures were exposed to concentrations up to 0.2 µg/ml. A concentration-related, statistically significant increase in chromosomal aberrations and aberrant cell frequencies was observed at all test concentrations. Micronuclei assay results were the same. The effect of Benzophenone-3 on DNA damage was studied using human breast epithelial cells. Concentrations of 1 µM and 5 µM Benzophenone-3 increased DNA damage.

Benzophenone-8 (in ethanol) was evaluated at doses of 0.008 to 700 µg/plate in the *Salmonella*/mammalian microsomal mutagenicity assay using the following *S. typhimurium* tester strains: TA98, TA100, TA1535, TA1537, and TA1538. With metabolic activation, Benzophenone-8 caused a weak, but reproducibly significant dose-dependent increase in the number of TA1537 revertants per plate. Benzophenone-8 (in ethanol) was tested in the L5178Y TK<sup>±</sup> mouse lymphoma mutagenesis assay (with and without metabolic activation) at concentrations ranging from 13 to 56 µg/ml. With metabolic activation, a significant dose-related increase in the mutant frequencies was observed. A bacterial reverse mutation assay on Benzophenone-8 (in DMSO) was performed using *S. typhimurium* strain TA100 (doses up to 1500 µg/plate) and *E. coli* strain WP2vurA (doses up to 5000 µg/plate), with and without metabolic activation. Results were negative.

The genotoxicity of Benzophenone-12 (in DMSO) in the mammalian cell gene mutation assay using mouse lymphoma L5178Y cells. Doses up to 50 µg/ml and 52 µg/ml were tested with and without metabolic activation, respectively. Results were negative without metabolic activation and ambiguous with metabolic activation.

In the in vivo micronucleus assay using mouse erythrocytes, results for Benzophenone-1 (doses not stated) were classified as inconclusive.

The genotoxicity of Benzophenone-3 was evaluated using the *Drosophila* somatic mutation and recombination test (SMART). In the SMART assay, larva from a mating of "multiple wing hair" (mwh) females with heterozygous "flare" (flr) males were exposed to 0, 3000, or 3500 mg/kg Benzophenone-3. None of the Benzophenone-3-treated larva produced flies with significantly more single or multiple wing spots than controls. In the same study, an in vivo cytogenetic assay on Benzophenone-3 using rat bone marrow cells was performed. Sprague-Dawley rats were treated with a single dose of 0.5,



1.67, or 5 g/kg Benzophenone-3, or five daily doses of 5 g/kg/day. Benzophenone-3 did not cause a significant increase in chromosomal aberrations in this assay.

In the mammalian erythrocyte micronucleus test, the genotoxicity of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated using groups of 10 Wistar albino rats. Doses up to 2000 mg/kg were administered dermally for 2 consecutive days, and Benzophenone-3 was classified as non-genotoxic. The same sunscreen formulation (0.6% to 0.9% Benzophenone-3) was evaluated for genotoxicity in the mammalian bone marrow chromosome aberration test using groups of 10 Wistar albino rats. Identical doses were administered according to the same procedure, and results were negative. Twelve ovariectomized Balb/c female mice were dosed orally with Benzophenone-3 (3 mg/kg/d) daily for 4 d. DNA damage was detected in mammary epithelial cells.

Effects of Benzophenone-1 on the proliferation and metastasis of MCF-7 human breast cancer cells expressing estrogen receptors were studied. It was concluded that Benzophenone-1 may accelerate the growth of MCF-7 breast cancer cells by regulating cell cycle-related genes and promote cancer metastasis through amplification of cathepsin D. In a wound healing assay, Benzophenone-1 (1  $\mu$ M) statistically significantly enhanced the migration capability of BG-1 ovarian cells by reducing the wounded area in the cell monolayer. It was noted that the results of this study indicate that Benzophenone-1 may have the ability to induce ovarian cancer metastasis. The effect of Benzophenone-3 (concentrations up to 150  $\mu$ g/l) on cancer cell growth was studied using NCI-H460 lung cancer cells. Results indicated that Benzophenone-3 had a cancer potentiating effect by enhancing anchorage-independent survival and growth of lung cancer cells.

The oral carcinogenicity of Benzophenone-3 was evaluated in an TP study using male and female Sprague-Dawley rats and male and female B6C3F1/N mice. On D 6, groups of 42, 35, 35, and 43 F<sub>0</sub> time-mated female rats were fed diets containing 0, 1000, 3000, and 10,000 ppm Benzophenone-3, respectively, for 39 d. Groups of 50 (1,000 and 3,000 ppm) or 60 (0 and 10,000 ppm) F<sub>1</sub> rats per sex continued on study after weaning and were fed diets containing the same exposure concentrations for 105 wk. There was equivocal evidence of carcinogenic activity of Benzophenone-3 exposure in male Hsd:Sprague Dawley® SD® rats, based on the occurrence of malignant meningiomas in the brain. There was equivocal evidence of carcinogenic activity in female Hsd:Sprague Dawley® SD® rats, based on the increased incidence of thyroid C-cell adenomas and the increased incidence of uterine stromal polyps. Groups of 50 male and 50 female mice were fed diets containing 0, 1000, 3000, or 10,000 ppm Benzophenone-3 in the diet (equivalent to average daily doses of approximately 113, 339, and 1207 mg Benzophenone-3/kg bw for male mice and 109, 320, and 1278 mg/kg for female mice) for 104 (female mice) or 105 (male mice) wk. There was no evidence of carcinogenic activity in male or female B6C3F1/N mice at exposure concentrations of 1000, 3000, and 10,000 ppm.

For tumorigenesis promotion experiments, female Trp53-null transplanted mice (generated from BALB/c Trp53<sup>+/-</sup> breeding mice) were randomly assigned into various dietary groups. In the Trp53-null mouse model, fragments of donor mammary epithelium were collected from female BALB/c Trp53-null mice at 8 wk of age, and transplanted into the cleared inguinal mammary fat pads of 3-wk-old female wild type BALB/c mice. The mice were placed on LFD (10% kcal fat) or HFD (60% kcal fat). Benzophenone-3 was compounded into the diets at 0.75 g/kg chow for pubertal animals (3 to 10 wk of age) and 1.5 g/kg chow for adult animals; each dosage yielded consumption of approximately 70 mg/kg BW/d. Benzophenone-3 was protective for epithelial tumorigenesis in mice fed lifelong LFD, while promotional for epithelial tumorigenesis in mice fed adult hfd.

The xenoestrogenic effect of Benzophenone-1 on BG-1 human ovarian cancer cells expressing estrogen receptors and relevant xenografted animal models, when compared to E2, was evaluated. In the in vitro cell viability assay, Benzophenone-1 (0.01 to 10  $\mu$ M) statistically significantly increased BG-1 cell growth, as did E2. In a second experiment, BG-1 cells (5 x 10<sup>6</sup>) were injected s.c. into the backs of groups of 6 female mice of the BALB/c nu/nu strain. Study results suggested that Benzophenone-1 is an endocrine disrupting chemical that exerts xenoestrogenic effects by stimulating the proliferation of BG-1 ovarian cancer via the estrogen receptor signaling pathway associated with the cell cycle.

A study was performed to evaluate the effects of Benzophenone-1 on prostate cancer progression. Benzophenone-1 increased the viability of LNCaP prostate cancer cells at concentrations of 1  $\mu$ M and 0.1  $\mu$ M. In the MTT assay, when the cells were co-treated with Benzophenone-1 (1  $\mu$ M) and bicalutamide (0.001  $\mu$ M), the cell viability that was increased by Benzophenone-1 alone was statistically significantly reduced. These results suggest that the proliferative effects of Benzophenone-1 on LNCaP cells was mediated by the androgen receptor signaling pathway.

Benzophenones-1, -3, -6, and -8 were evaluated in the Bhas promotion assay at concentrations ranging from 2 to 100  $\mu$ g/ml. Bhas 42 cells established from BALB/3T3 cells were used. Results indicated that none of the test substances caused a statistically significant increase in the number of transformation foci (relative to the solvent controls) over the range of concentrations. Thus, promotion activity was classified as negative.

The in vivo antitumor activity of Benzophenone-8 and Benzophenone-12 was evaluated using a two-stage mouse skin carcinogenesis model. Groups of 15 pathogen-free, female hairless mice of the HOS:HR-1 strain were used, and skin tumors were induced by a single dose of NOR-1 (390 nmol). Each test substance was administered at a concentration of 0.0025% to mice through drinking water, beginning at 1 week prior to tumor initiation and ending at 1 week after tumor initiation. Benzophenone-8 was a more potent inhibitor of skin tumors than Benzophenone-12.

Benzophenone-2 was applied (10 mg/kg) to the skin of 10 male Wistar rats for 4 wk. Benzophenone-2 did not exacerbate oxidative stress and apoptosis markers in the hippocampus and frontal cortex; however, it did lower oxidative stress in the frontal cortex.

In the neuroblastoma (SH-SY5Y) cell line, Benzophenone-2 and Benzophenone-3 adversely affected the viability of nerve cells, most likely by enhancing the process of apoptosis. Both test substances produced a statistically significant cytotoxic effect at concentrations of 10  $\mu$ M and 100  $\mu$ M. In another study (dermal exposure to male offspring of Sprague-Dawley rats), it was noted that exposure to Benzophenone-3 induces the mitochondrial apoptosis pathway in the rat frontal cortex. A 36% decrease in neuron viability was observed when cultures of rat fetal primary cortical neurons were exposed to Benzophenone-3 (10  $\mu$ g/ml) for 7 d. The authors noted that the results of this study indicate that exposure to Benzophenone-3 induces the mitochondrial apoptosis pathway in the rat frontal cortex. A continuous 24-h exposure of neocortical and hippocampal cultures (from Swiss mouse embryos) to Benzophenone-3 (25 to 100  $\mu$ M) induced apoptosis in mouse neuronal cells. Hippocampal cells exhibited weaker vulnerability.

The neurotoxicity of Benzophenone-3 and its metabolite (Benzophenone-1) was studied using female Sprague-Dawley rats and their offspring. Benzophenone-3 (10% in cream; dose = 100 mg/kg) was administered dermally (shaved skin on back) twice daily to adult female rats (number not stated) during the prenatal period and adulthood. Results indicated that dermal Benzophenone-3 exposure may cause damage to neurons that might be associated with the increase in the level of extracellular glutamate.

Benzophenone-2 (at 250 and 500  $\mu$ M) accelerated the conversion of dopachrome (intermediate in melanin biosynthesis) to melanin.

Benzophenone-3 (in ethanol) was applied (volume = 100  $\mu$ l; dose = 5 mg/kg [312.5  $\mu$ g/cm<sup>2</sup>]) topically to a 4 cm<sup>2</sup> area on the back (10 rats), daily for 30 d. Various behavioral testing protocols were used to assess the arousal (open field tests), locomotion (open field and ladder test), habituation (open field test), and motor coordination (open field and ladder test) of the animals over the study duration. No significant adverse behavioral effects were observed.

Murine splenocytes were cultured in the presence of different concentrations of Benzophenone-2 (0.01 to 10  $\mu$ M). Benzophenone-2 (10  $\mu$ M) shifted the Th1/Th2 balance toward a Th2 response (lower IFN- $\gamma$  production and higher IL-10). It was noted that these results show that Benzophenone-2 at high doses may possess immunomodulatory effects. The dosing of 10 male Wistar rats with Benzophenone-3 (100 mg/kg) dermally for 4 wk did not have a toxic effect on splenocytes and thymocytes, but increased the activity and function of these cells.

The immunosuppressive activity of Benzophenone-4 (0.01%) was evaluated using human dendritic cells (e.g., CD14+ human monocytes). Treatment with Benzophenone-4 did not impair the proliferation of lymphocytes.

In the zebrafish embryo assay on Benzophenone-1, Benzophenone-3, and Benzophenone-8, significant decreases in whole-body T4 and T3 levels were observed at day 6 post-fertilization.

Groups of 11 ovariectomized adult Sprague-Dawley rats were dosed orally (by gavage) with 250 mg/kg and 1000 mg/kg Benzophenone-2 (1 ml) daily for 5 d. A dose-dependent suppression of T4 concentration by Benzophenone-2 was observed. T3 levels were also reduced.

The estrogenic activity of Benzophenone-3 was evaluated (in a reporter gene assay) using the human cervical epithelioid HeLa cell line as the host cell line for the generation of stable reporter cells for screening substances that act via hER $\alpha$  hER $\beta$ . Assays were performed at concentrations between 0.1  $\mu$ M and 10  $\mu$ M. Benzophenone-3 activated Era moderately and had almost no effect on Er $\beta$ . Benzophenone-3 was not considered estrogenic at 10  $\mu$ M. Exposure to Benzophenone-3 (0.0001  $\mu$ M) for 24 h increased basal corticosterone secretion from cultured adrenocortical cells.

Benzophenone-2 was applied to the skin of 10 male Wistar rats at a dose of 100 mg/kg for 4 wk. HPT activity was increased, i.e., the level of TSH was reduced and the free fraction of T3 and T4 in the blood was increased. Benzophenone-2 interference with thyroid function was evaluated in another study. Groups of 12 ovariectomized, female Sprague-Dawley rats received oral doses ranging from 10 to 1000 mg/kg for up to 5 d. A dose-dependent decrease in total serum T4 levels was observed, with statistically significant alterations at doses of 333 mg/kg and 1000 mg/kg. The small decrease in total T3 was not statistically significant.

The dosing of 10 male Wistar rats with Benzophenone-3 (100 mg/kg) dermally for 4 wk had no effect on the following hematological parameters: leukocyte count, erythrocyte count, platelet count, erythrocyte morphology, and erythrocyte hemoglobin content.

The cytotoxicity of a sunscreen formulation composed of polymeric nanocapsules loading Benzophenone-3 was evaluated using the L929 fibroblast cell line. The nanocapsules were seeded at a concentration of 30  $\mu$ g/ml, and the sunscreen formulation was found to be non-cytotoxic. In rat thymocytes, cell mortality increased significantly after 3 h of exposure to 300  $\mu$ M Benzophenone-3.

In MCF-7 breast cancer cells incubated for 6 d, Benzophenone-3 increased cell proliferation, with an EC<sub>50</sub> between 1.56 and 3.73  $\mu$ M. An increase in uterine weight (weak effect, active at dose of 1525 mg/kg/d) was reported in a uterotrophic

assay, whereby immature Long-Evans rats were fed Benzophenone-3 in the diet for 4 d. The hormonal activity of Benzophenone-3 was evaluated using *Saccharomyces cerevisiae* strains BLYES and BLYAS. In the estrogen assay, an EC<sub>50</sub> value of 6.44 µM (estrogenic activity) was reported for Benzophenone-3. In the androgen assays, the androgenicity of Benzophenone-3 was not proven. However, Benzophenone-3 was found to be antiandrogenic (EC<sub>50</sub> = 10.2 µM).

Benzophenone-8 (10 µM) upregulated PDE4B expression in normal human keratinocytes. Also, Benzophenone-3 and UVB co-stimulation induced PDE4B upregulation. It was concluded that PDE4B has a role in the mechanism of Benzophenone-3-induced phototoxicity.

A sunscreen formulation composed of polymeric nanocapsules loading Benzophenone-3 (0.005 wt%) was classified as a non-irritant in the HET-CAM. Benzophenone-4 (25 mg) was considered corrosive to the skin when evaluated using a three-dimensional human epidermis model.

There were no signs of erythema or edema in a group of 24 Wistar albino rats after a 24-h patch application of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%). The same was true in 18 male New Zealand rabbits after a 72-h patch application of the same formulation. When Benzophenone-3 (in isopropyl myristate and SD alcohol vehicle) was applied to the skin of 30 female, Hartley albino guinea pigs, (followed by irradiation with UVA), concentrations of 0.1% and 0.3% produced erythema grades greater than 1+. Solutions containing 3% and 6% Benzophenone-3 produced erythema grades of less than 1+ when applied to the skin of guinea pigs. The authors noted that the erythema grade decreased with increasing concentration because the photoprotection afforded by Benzophenone-3 was concentration-dependent. Benzophenone-8 (0.5 g in water) was evaluated for skin irritation potential using 3 New Zealand white rabbits in a 4-h patch test. Skin irritation was not observed. Benzophenone-12 (0.5 g) was also classified as non-irritating to the skin of rabbits in a 4-h patch test.

In a 48-h patch test involving 80 subjects, Benzophenone-4 (5% in petrolatum) induced skin irritation in 4 subjects. Benzophenone-4 (10% in petrolatum) induced skin irritation in 6 subjects.

Benzophenone-8 was classified as a sensitizer in the in vitro KeratinoSens assay (HaCaT cell line) when tested at concentrations up to 200 mM. The skin sensitization potential of a sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) was evaluated in a study involving 30 adult male guinea pigs (3 groups of 10), and results were negative. The local lymph node assay was also used to evaluate the sensitization potential of Benzophenone-3 (12.5%, 25%, and 50%), and results were negative. The maximization test was used to assess the cutaneous allergenic potential of Benzophenone-12, using 10 albino guinea pigs challenged with 40% Benzophenone-12 in PEG 300. Positive reactions were observed in 7 animals. Benzophenone-12 was evaluated for skin sensitization potential in another maximization test using 20 guinea pigs of the Pirbright white (Tif:DHP) strain. Sixty-five percent and 60% of the animals were sensitized to Benzophenone-12 at 24 h and 48 h after challenge, respectively.

In retrospective and multicenter studies, patient patch tests indicated allergic reactions to Benzophenone -3 at concentrations of 3% and 10%. At a test concentration of 3%, study population size ranged from 4094 to 23,908 patients. At a test concentration of 10%, study population size ranged from 157 to 23,908 patients. Allergic reactions to Benzophenone-3 were observed at concentrations as low as 2% within a patient population of 355. At a test concentration of 10% Benzophenone-4, allergic reactions were observed in patient populations ranging from 157 to 4857. Allergic reactions to Benzophenone-4 at lower test concentrations of 2% (in population of 347 patients) and 5% (in population of 1155 patients) were also reported. Benzophenone-10 caused allergic reactions at concentrations of 2% (in population of 280 patients) and 10% (in population of 157 patients). In a study in which 19,570 patients used sunscreens containing 1% to 6% Benzophenone-3, the mean rate for contact allergy to Benzophenone-3 was 0.07%. Photoallergic reactions to Benzophenone-3 were observed at patch test concentrations of 2% (in patient populations of 187 and 355), 3% (in group of 4 patients), and 10% (in patient population of 1000). Benzophenone-4 was photoallergic at a patch test concentration of 2% (in patient population of 1000), but not at 10% (in group of 15 patients). Benzophenone-10 was photoallergic at a patch test concentration of 10% (in group of 15 patients).

The following types of reactions were observed in case reports: sensitization reactions to Benzophenone-2 (at 1% and 2% in petrolatum); contact dermatitis and positive photopatch (2% in petrolatum) test reactions to Benzophenone-3; photoallergic contact urticaria, contact urticaria (at 10% in petrolatum) and anaphylactic reactions (wheal and flare) to Benzophenone-3; contact dermatitis (10% in petrolatum) and negative/questionable photopatch reaction to Benzophenone-4; contact dermatitis and positive photopatch reactions to Benzophenone-10; and anaphylactic reactions to Benzophenone-8 and Benzophenone-10.

In other clinical reports, Benzophenone-3 exposure was not significantly associated with the age of menarche in a population of 1598 participants. However, in another study, (200 girls), urinary levels of Benzophenone-3 were associated with decreased time to menarche. Benzophenone-3 was associated with lower levels of serum testosterone in male adolescents in a study involving male and female children and adolescents (population of 588). In a population of 476 pregnant women, an association between maternal urinary Benzophenone-3 and lower abdominal circumference in males was made. In a cohort of 922 pregnant women, average Benzophenone-3 urinary concentrations were associated with an increase in gestational age. No association between urinary Benzophenone-3 from personal care products and pubertal timing in girls

and boys was found in a population of 338 children. A positive association between urinary Benzophenone-3 in both placental weight and child birth weight was observed in a cohort of 473 mother-son pairs. A study was performed to examine whether maternal and paternal preconception urinary concentrations of Benzophenone-3 (e.g., from dietary and personal care product exposure) were associated with risk of preterm birth. No consistent pattern of association was observed.

In a case-control study on idiopathic male infertility and environmental exposure to phenols, there was no evidence for an association between exposure to Benzophenone-3 and idiopathic male infertility. Urinary levels of Benzophenone-3 and the incidence of Hirschsprung's disease were investigated using a total of 423 patients. Results indicated a positive association between women identified with medium to high levels of Benzophenone-3 in the urine and the incidence of Hirschsprung's disease. The presence of UV filters in semen, serum, and the urine was studied using 300 men. Benzophenones-1 and Benzophenone-3 were detected in urine and seminal fluid. The relationship between urinary concentrations of benzophenones and semen quality was evaluated in a study involving 413 men. Benzophenone-2 and Benzophenone-8 were associated with changes in semen endpoints, including sperm concentration, sperm viability, motility, sperm head, and morphology. No associations were observed for Benzophenone-1 or Benzophenone-3. A study (215 university students) was performed to examine associations between urinary concentrations of benzophenone-type UV filters and semen quality and reproductive hormone levels. A statistically significant positive association between urinary Benzophenone-1 and Benzophenone-3 concentrations and serum FSH levels was noted. Additionally, urinary Benzophenone-1 concentration was statistically significantly positively associated with T/E2, and urinary Benzophenone-1 concentration was negatively associated with inhibin B/FSH ratio.

Results from an SCCP risk assessment using data from a skin penetration study involving full-thickness pig ear skin were used to arrive at a conclusion relating to the safety of Benzophenone-3. A MOS of 1686 was calculated, and the SCCP concluded that the use of Benzophenone-3 as a UV-filter up to 6% in cosmetic sunscreen products and up to 0.5% in all types of cosmetic products to protect the formulation does not pose a risk to the health of the consumer, apart from its contact allergenic and photoallergenic potential. The MOS of 1686 was for use to protect a formulation (0.5%) not use as a sunscreen (6%).

## **DISCUSSION**

The Panel published a safety assessment of benzophenones with the following conclusion in 1983: "On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics." During the same year, the Panel also published an addendum to this existing safety assessment, having concluded that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic and that the published conclusion on Benzophenones-1, -3, -4, -5, -9, and -11 is applicable to these 3 ingredients. In accordance with CIR Procedures & Support to the Expert Panel for Cosmetic Ingredient Safety, the Panel evaluates the conclusions of previously-issued reports every 15 years. Thus, the Panel re-evaluated the conclusion, and in 2005, published re-review summary that stated the Panel determined to not reopen the 1983 published safety assessment until results from NTP carcinogenicity studies on benzophenones were available. An NTP oral carcinogenicity study on Benzophenone-3 was published in May 2020, and results from this study have been reviewed by the Panel, along with other safety test data on benzophenones that have been identified in the published literature since the original safety assessment was published in 1983.

The Panel reviewed a number of systemic toxicity studies on benzophenones. However, the Panel noted that these studies were performed at high concentrations that are not relevant to cosmetic exposure. The NTP oral carcinogenicity study on Benzophenone-3 reviewed by the Panel involved rats and mice. Results indicated equivocal evidence of carcinogenicity, i.e., male rats with benign thyroid tumors and malignant meningiomas in the absence of a dose response, and no evidence of carcinogenicity in mice. Based on these results, the Panel did not express any concern over the carcinogenic potential of benzophenones in cosmetic products.

The issue of incidental inhalation exposure from the use of Benzophenone-3 and Benzophenone-4 in cosmetic products was discussed by the Panel. Benzophenone-3 is being used in aerosol hair spray (maximum concentration of 0.014%), pump hair spray (maximum concentration of 0.05%), and in pump deodorant spray (at maximum concentration of 0.08%). Benzophenone-4 is also being used in aerosol hair spray (maximum concentration of 0.015%) and pump hair spray (maximum concentrations of 0.001% to 0.1%). The Panel noted that in aerosol products, 95% – 99% of droplets/particles would not be respirable to any appreciable amount. Furthermore, droplets/particles deposited in the nasopharyngeal or bronchial regions of the respiratory tract present no toxicological concerns based on the chemical and biological properties of Benzophenone-3 or Benzophenone-4. Coupled with the small actual exposure in the breathing zone and the concentrations at which the ingredients are used, 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>.

**CONCLUSION**

The Expert Panel for Cosmetic Ingredient Safety concluded that the following benzophenone ingredients are safe in cosmetics in the present practices of use and concentration described in this safety assessment.

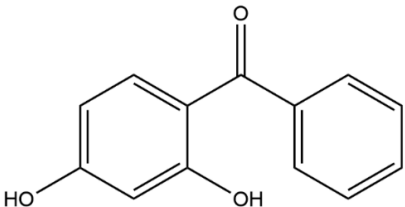
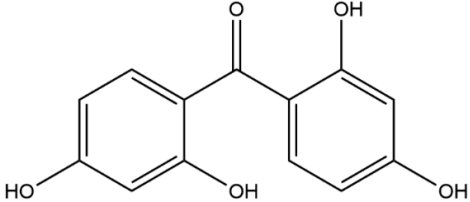
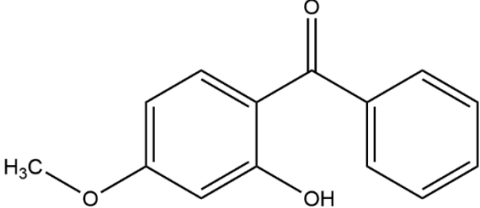
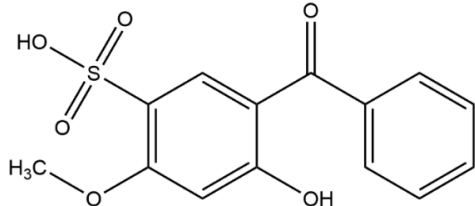
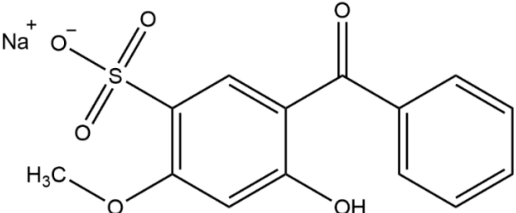
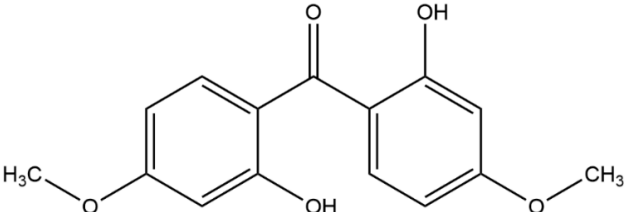
Benzophenone-1  
Benzophenone-2  
Benzophenone-3  
Benzophenone-4

Benzophenone-5  
Benzophenone-6\*  
Benzophenone-8\*  
Benzophenone-9

Benzophenone-10\*  
Benzophenone-11\*  
Benzophenone-12\*

\* 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 product categories and at concentrations comparable to others in this group,

**TABLES****Table 1. Definitions, idealized structures, and reported functions of the ingredients in this safety assessment.** <sup>(4,CIR Staff)</sup>

<b>Ingredient /CAS No.</b>	<b>Definition &amp; Structures</b>	<b>Function(s)</b>
Benzophenone-1 131-56-6	Benzophenone-1 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers
Benzophenone-2 131-55-5	Benzophenone-2 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers
Benzophenone-3 131-57-7	Benzophenone-3 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers; Sunscreen Agents
Benzophenone-4 4065-45-6	Benzophenone-4 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers; Sunscreen Agents
Benzophenone-5 6628-37-1	Benzophenone-5 is the sodium salt of Benzophenone-4 and conforms to the structure: 	Light Stabilizers
Benzophenone-6 131-54-4	Benzophenone-6 is a benzophenone derivative that conforms to the structure: 	Fragrance Ingredients; Light Stabilizers

**Table 1. Definitions, idealized structures, and reported functions of the ingredients in this safety assessment.** <sup>(4,CIR Staff)</sup>

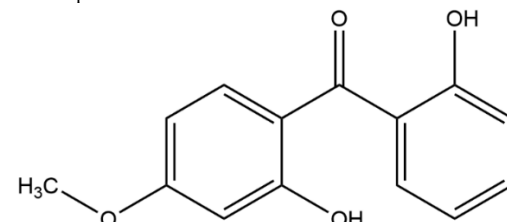
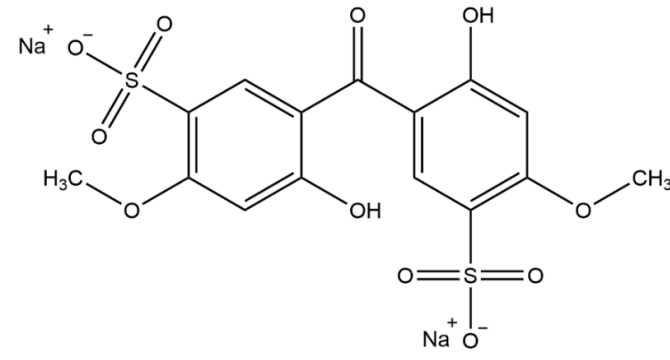
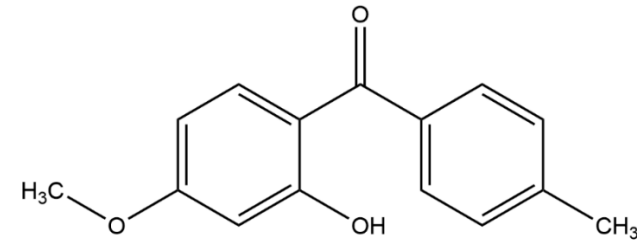
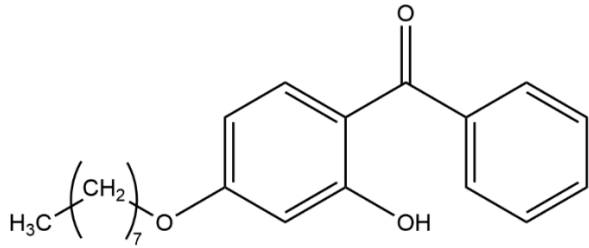
Ingredient /CAS No.	Definition & Structures	Function(s)
Benzophenone-8 131-53-3	Benzophenone-8 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers; Sunscreen Agents
Benzophenone-9 76656-36-5	Benzophenone-9 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers
Benzophenone-10 1641-17-4	Benzophenone-10 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers
Benzophenone-11 1341-54-4	Benzophenone-11 is a mixture of Benzophenone-6, Benzophenone-2, and other tetra-substituted benzophenone materials.	Light Stabilizers
Benzophenone-12 1843-05-6	Benzophenone-12 is a benzophenone derivative that conforms to the structure: 	Light Stabilizers

Table 2. Chemical Properties

Property	Value/Results	Reference
<b>Benzophenone-1</b>		
Form	Light-yellow powder	1
Molecular weight (g/mol)	214.21	1
Specific gravity (g/ml)	1.27	1
Solubility	Soluble in methanol, ethanol, ethyl acetate, methyl ethyl ketone, acetone, ether, and acetic acid; slightly soluble in benzene; insoluble in water	1
Melting point (°C)	144	1
log K <sub>ow</sub>	2.96 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	290	1
<b>Benzophenone-2</b>		
Form	Yellow crystalline solid	1
Molecular weight (g/mol)	302.33	1
Solubility	Soluble in methanol, ethanol, methyl ethyl ketone; slightly soluble in water	1
Melting point (°C)	195	1
log K <sub>ow</sub>	2.78 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	283	1
<b>Benzophenone-3</b>		
Form	Light, cream-colored powder	1
Molecular weight (g/mol)	228.26	1
Solubility	Soluble in most organic solvents; insoluble in water	1
Melting point (°C)	66	1
log K <sub>ow</sub>	3.79 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	289	1
<b>Benzophenone-4</b>		
Form	Pale, ivory-colored powder	1
Molecular weight (g/mol)	318.39	1
Solubility	Soluble in water, methanol, and ethanol	1
Melting point (°C)	147	1
log K <sub>ow</sub>	0.37 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	288	1
<b>Benzophenone-5</b>		
Formula weight (g/mol)	330.29 (sodium cation is 22.99)	1
log K <sub>ow</sub>	-1.42 (estimated)	10
<b>Benzophenone-6</b>		
Form	Light yellow solid	1
Molecular weight (g/mol)	274.26	1
Specific gravity (g/ml)	1.34	1
Solubility	Soluble in methanol, ethanol, ethyl acetate, methyl ethyl ketone, and toluene; insoluble in water	1
Melting point (°C)	124	1
log K <sub>ow</sub>	3.90 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	281	1
<b>Benzophenone-8</b>		
Form	Yellow crystalline solid	1
Molecular weight (g/mol)	244.24	1
Solubility	Soluble in methanol, ethanol, ethyl acetate, isopropanol, ether, and acetone; slightly soluble in water	1
Boiling point (°C @ 1 mm Hg)	164-166	1
Melting point (°C)	73.5-74.5	1
log K <sub>ow</sub>	3.82 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	285	1
<b>Benzophenone-9</b>		
Form	Light yellow powder	1
Formula weight (g/mol)	478.35 (2 sodium cations are 45.97)	1
Solubility	Soluble in methanol and ethanol; insoluble in ethyl acetate and benzene	1
Melting point (°C)	350	1
log K <sub>ow</sub>	-2.78 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	284	1
<b>Benzophenone-10</b>		
Molecular weight (g/mol)	242.27	1
log K <sub>ow</sub>	4.07 (estimated)	10
UV absorption λ <sub>max</sub> (nm)	300	1
<b>Benzophenone-11</b>		
Form	Yellow or tan powder	1
Specific gravity (g/ml)	1.38	1
Solubility	Soluble in methanol, ethanol, ethyl acetate, and methyl ethyl ketone; insoluble in water	1
Melting range (°C)	85-105	1
UV absorption λ <sub>max</sub> (nm)	285	1
<b>Benzophenone-12</b>		
Molecular weight (g/mol)	326.44	1
log K <sub>ow</sub>	6.96 (estimated)	10





**Table 3. Current and historical frequency and concentration of use of benzophenones according to duration and exposure**

	<i># of Uses</i>		<i>Max Conc of Use (%)</i>		<i># of Uses</i>		<i>Max Conc of Use (%)</i>	
	<b>Benzophenone-8</b>				<b>Benzophenone-9</b>			
	<b>2021<sup>11</sup></b>	<b>1983<sup>1</sup></b>	<b>2020<sup>12</sup></b>	<b>1983<sup>1</sup></b>	<b>2021<sup>11</sup></b>	<b>1983<sup>1</sup></b>	<b>2020<sup>12</sup></b>	<b>1983<sup>1</sup></b>
<b>Totals*</b>	<b>NR</b>	<b>4</b>	<b>NR</b>	<b>0.1-1</b>	<b>13</b>	<b>123</b>	<b>NR</b>	<b>0.1-1</b>
<b><i>Duration of Use</i></b>								
<i>Leave-On</i>	<i>NR</i>	<i>1</i>	<i>NR</i>	<i>0.1</i>	<i>8</i>	<i>41</i>	<i>NR</i>	<i>0.1-1</i>
<i>Rinse-Off</i>	<i>NR</i>	<i>2</i>	<i>NR</i>	<i>0.1-1</i>	<i>5</i>	<i>27</i>	<i>NR</i>	<i>0.1-1</i>
<i>Diluted for (Bath) Use</i>	<i>NR</i>	<i>1</i>	<i>NR</i>	<i>0.1-1</i>	<i>NR</i>	<i>55</i>	<i>NR</i>	<i>0.1</i>
<b><i>Exposure Type</i></b>								
Eye Area	NR	NR	NR	NR	NR	NR	NR	NR
Incidental Ingestion	NR	NR	NR	NR	2	NR	NR	NR
Incidental Inhalation-Spray	NR	1 <sup>a</sup>	NR	0.1 <sup>a</sup>	4 <sup>c</sup>	4;13 <sup>b</sup> ;14 <sup>c</sup>	NR	0.1-1;0.1-1 <sup>a</sup> ;0.1-1 <sup>c</sup>
Incidental Inhalation-Powder	NR	NR	NR	NR	4 <sup>c</sup>	14 <sup>c</sup>	NR	0.1-1 <sup>c</sup>
Dermal Contact	NR	2	NR	0.1-1	11	96	NR	0.1-1
Deodorant (underarm)	NR	NR	NR	NR	NR	NR	NR	NR
Hair – Non-Coloring	NR	2	NR	0.1-1	NR	23	NR	0.1-1
Hair-Coloring	NR	NR	NR	NR	NR	1	NR	0.1
Nail	NR	NR	NR	NR	NR	3	NR	0.1
Mucous Membrane	NR	1	NR	0.1-1	7	55	NR	0.1
Baby Products	NR	NR	NR	NR	NR	NR	NR	NR
<b><i>Benzophenone-11</i></b>								
	<b>2021<sup>11</sup></b>	<b>1983<sup>1</sup></b>	<b>2020<sup>12</sup></b>	<b>1983<sup>1</sup></b>				
<b>Totals*</b>	<b>NR</b>	<b>168</b>	<b>NR</b>	<b>0.1-5</b>				
<b><i>Duration of Use</i></b>								
<i>Leave-On</i>	<i>NR</i>	<i>140</i>	<i>NR</i>	<i>0.1-5</i>				
<i>Rinse-Off</i>	<i>NR</i>	<i>19</i>	<i>NR</i>	<i>0.1</i>				
<i>Diluted for (Bath) Use</i>	<i>NR</i>	<i>9</i>	<i>NR</i>	<i>0.1-1</i>				
<b><i>Exposure Type</i></b>								
Eye Area	NR	NR	NR	NR				
Incidental Ingestion	NR	NR	NR	NR				
Incidental Inhalation-Spray	NR	85;25 <sup>a</sup> ;2 <sup>c</sup>	NR	0.1-5;0.1-1 <sup>a</sup> ;0.1 <sup>c</sup>				
Incidental Inhalation-Powder	NR	2 <sup>c</sup>	NR	0.1 <sup>c</sup>				
Dermal Contact	NR	144	NR	0.1-1				
Deodorant (underarm)	NR	NR	NR	NR				
Hair – Non-Coloring	NR	21	NR	0.1-5				
Hair-Coloring	NR	NR	NR	NR				
Nail	NR	3	NR	0.1				
Mucous Membrane	NR	12	NR	0.1-1				
Baby Products	NR	NR	NR	NR				

\*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.

<sup>a</sup> It is possible these products are sprays, but it is not specified whether the reported uses are sprays.

<sup>b</sup> It is possible these products are powders, but it is not specified whether the reported uses are powders.

<sup>c</sup> Not 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  
NR – no reported use

**Table 4. Benzophenones With No Reported Uses.<sup>11,12</sup>**

Benzophenone-6
Benzophenone-8
Benzophenone-10
Benzophenone-11
Benzophenone-12

**Table 5. Biomonitoring Studies in Humans**

Compound	Subjects	Concentration/dosage	Procedure	Results	Reference
Benzophenone-1, Benzophenone-2, Benzophenone-3, and 4-hydroxybenzophenone	20 males	Unknown - undefined sources	Benzophenones and 4-hydroxybenzophenone (metabolite of Benzophenone-1 and Benzophenone-3) detected in urine samples, using dispersive liquid-liquid microextraction (DLLME), followed by ultra-high-performance liquid chromatography-tandem mass spectrometry (UHPLC-MS/MS). Regarding method validation in terms of linearity, concentration range from minimal quantified amount (limit of quantification) to 40 ng/ml selected.	Conjugated form of Benzophenone-1 detected and quantified in 100% of the samples at concentrations ranging from 0.1 to 25 ng/ml. Free form of Benzophenone-1 detected in 95% and quantified in 90% of the samples in a concentration range of 1.2 to 5.7 ng/ml. Conjugated form of Benzophenone-2 detected and quantified in 85% of the samples in concentrations ranging from 0.1 to 7.1 ng/ml. Free form of Benzophenone-2 detected in all samples and quantified in 65% of the samples, at concentrations ranging from 0.5 to 2.2 ng/ml. Conjugated form of Benzophenone-3 detected and quantified in almost all samples (n = 19/20) at concentrations ranging from 0.6 to 44 ng/ml. Free form of Benzophenone-3 detected in 100% of the samples, but was not quantified in any of them. Free form of 4-hydroxybenzophenone detected and quantified in all samples, in a range of 0.9 to 2.0 ng/ml. Conjugated form of 4-hydroxybenzophenone detected in 60% of the samples in concentrations ranging from 0.1 to 0.9 ng/ml	<sup>53</sup>
Benzophenone-1 and Benzophenone-3	157 subjects (59 females, 39 males, and 59 children) in Germany	Unknown - undefined sources	Spot urine samples (157 total) obtained between October of 2007 and February of 2009.	Benzophenone-1 and Benzophenone-3 had high detection rates (26%). Urinary concentrations ( $\mu\text{g/l}$ ) of the 2 benzophenones not reported. High detection rates also reported for bisphenol A (95%) and triclosan (45%)	<sup>54</sup>
Benzophenone-1, Benzophenone-3, and 4-Hydroxybenzophenone	12 volunteer mothers in Spain	Unknown - undefined sources	Study performed to investigate exposure of human embryos and fetuses to UV filters. Placentas (12) from volunteer mothers collected at delivery. Presence of UV filters analyzed by liquid chromatography-tandem mass spectrometry (LC-MS/MS)	Benzophenone-1 detected in all samples, and at concentrations below method limit of quantification (MLOQ, between 0.02 and 0.07 ng/g fresh weight). Benzophenone-3 not detected in any sample. 4-Hydroxybenzophenone, metabolite of Benzophenone-1 and Benzophenone-3, detected in 3 of the 12 placental samples at a concentration (0.07 ng/g fresh weight) below the MLOQ	<sup>55</sup>
Benzophenone-1 and Benzophenone-3	34 women in Tunisia	Unknown - undefined sources	Urinary concentrations determined using dispersive liquid-liquid microextraction and UHPLC-MS/MS.	Benzophenone-1 and Benzophenone-3 found in 91.2% and 64.7% of the analyzed samples, respectively. Geometric mean concentrations of Benzophenone-1 and Benzophenone-3 were 1.3 and 1.1 ng/ml, respectively	<sup>56</sup>
Benzophenone-1 and Benzophenone-3	143 reproductive aged women	Unknown - undefined sources	Total of 143 women provided 509 spot urine samples, collected across 2 months of study (3 to 5 samples per woman). Urinary concentrations measured and biomarker variability characterized using the intraclass correlation coefficient (ICC). ICC defined as the ratio of between-subject variance to total variance, with 95% CI. ICC values close to 0 indicate little to no reproducibility, while values close to 1 indicate perfect reproducibility, where most of the variance is attributed to differences between individuals as opposed to within-person differences.	Geometric mean urinary concentrations of Benzophenone-3 and Benzophenone-1 were 4.3 $\mu\text{g/l}$ and 3.3 $\mu\text{g/l}$ , respectively. ICCs for Benzophenone-3 and Benzophenone-1 were 0.66 and 0.55, respectively.	<sup>57</sup>

**Table 5. Biomonitoring Studies in Humans**

Compound	Subjects	Concentration/dosage	Procedure	Results	Reference
Benzophenone-1, Benzophenone-3, and 4-Hydroxybenzophenone	200 pregnant women	Unknown - undefined sources	Prospective study involved simultaneously-collected, paired samples, of amniotic fluid and maternal serum and urine. Additionally, samples of human fetal blood (n = 4) obtained during cordogenesis; cord blood (n = 23) obtained at time of delivery. Samples collected from September of 2012 to August of 2014.	The following benzophenones were all detectable in amniotic fluid and cord blood, and, except for 4-hydroxybenzophenone, also in fetal blood: Benzophenone-1, Benzophenone-3, 4-methylbenzophenone, and 4-hydroxybenzophenone. Benzophenone-1 and Benzophenone-3 detected at ~ 10 times lower concentrations in fetal and cord blood, when compared to maternal serum, and at a 1000 times lower concentration when compared to maternal urine concentrations. Therefore, Benzophenone-1 and Benzophenone-3 were only detectable in the fetal circulation in cases of high maternal exposure, indicating some protection by placental barrier. 4-Methoxybenzophenone appeared to pass into fetal and cord blood more freely, with a median 1:3 ratio between cord blood and maternal serum levels. Women appeared to have been most exposed to Benzophenone-3, and this was the only benzophenone in which the measured concentrations in the maternal urine and serum correlated with concentrations measured in amniotic fluid. Based on these data, the authors determined that for Benzophenone-3, but not the other benzophenones, maternal urinary concentrations seem to be a valid proxy for fetal exposure.	58
Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-4, Benzophenone-8, and 4-hydroxybenzophenone.	1576 subjects in South Korea	Unknown - undefined sources	Urine samples were collected from July to September in 2010 and 2011. Liquid chromatography-mass spectrometry was used for analysis.	Detection rates for Benzophenone-1 and 4-hydroxybenzophenone were 56% (limit of detection = 0.59 ng/ml) and 88% (limit of detection = 0.04 ng/ml), respectively. Geometric means of urinary Benzophenone-1 and 4-hydroxybenzophenone concentrations were 1.24 ng/ml and 0.45 ng/ml, respectively. Detection rate for the following benzophenones was below 25%: Benzophenone-2, Benzophenone-3, Benzophenone-4, and Benzophenone-8.	59
Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-6, and Benzophenone-8	25 female subjects in Southern Spain	Unknown - undefined sources	Benzophenones detected in human menstrual blood	Benzophenone-3 detected most frequently ( in 24 of 25 subjects), followed by Benzophenone-6 (in 17 of 25 subjects), and Benzophenone-1 (in 11 of 25 subjects). Neither Benzophenone-2 nor Benzophenone-8 detected in any of the samples. Maximum concentrations were very similar for Benzophenone-1, Benzophenone-3, and Benzophenone-6 (3.1 to 3.7 ng/ml).	60
Benzophenone-1, Benzophenone-3, and Benzophenone-8	441 adult, premenopausal females in South Korea	Unknown - undefined sources	Study performed from 2015 to 2016. Benzophenones detected in urine.	Detection frequencies in urine samples were: Benzophenone-1 (98.4%), Benzophenone-3 (74.6%), and Benzophenone-8 (22.9%). Authors noted that Benzophenone-1 is a major urinary metabolite of Benzophenone-3.	61
Benzophenone-1 and Benzophenone-3	300 men	Unknown - undefined sources	Presence of UV filters in semen, serum, and urine studied. Samples collected during February to December of 2013. Only 6 men had used sunscreen during the 48 h preceding sample collection.	Benzophenone-1 and Benzophenone-3 detected in 19% and 27% of the seminal fluid samples, respectively, albeit at levels of 1 to 2 orders of magnitude lower than were detected in urine. For Benzophenone-1 and Benzophenone-3, levels in the urine and seminal fluid were significantly correlated.	62

**Table 5. Biomonitoring Studies in Humans**

Compound	Subjects	Concentration/dosage	Procedure	Results	Reference
Benzophenone-1, Benzophenone-2, Benzophenone-3, Benzophenone-8, and 4-hydroxybenzophenone	Children and adults in the United States and China	Unknown - undefined sources	Urine samples (166 total) collected from the subjects. In United States, urine samples collected from children in 2012, and from adults during May to July of 2011. In China, urine samples collected from children in March and April of 2002, and from adults during August and September of 2010. Samples analyzed for free and total forms (free + conjugated) of Benzophenone-3 as well as the following 4 of its metabolic derivatives: 4-hydroxybenzophenone; Benzophenone-1; Benzophenone-2; and Benzophenone-8.	Benzophenone-3 detected in practically all urine samples from US and China. Concentrations of Benzophenone-3 in children (geometric mean = 9.97 ng/ml) and adults (geometric mean: 15.7 ng/ml) from the US statistically significantly higher when compared to children (geometric mean = 0.622 ng/ml) and adults (geometric mean = 0.099 ng/ml) from China. Statistically significant positive relationship found between concentrations of urinary Benzophenone-3 and its derivatives. Profiles of Benzophenone-3 derivatives in urine suggested that demethylation was major route of Benzophenone-3 metabolism. Statistically significantly lower percentage of free form of Benzophenone-3 found in urine from US population than in the Chinese population	<sup>63</sup>
Benzophenone-3	352 subjects	Personal care products and unknown sources	Urinary excretion of ingredients over 6-d period studied.	Benzophenone-3 was frequently detected, i.e., in 70% of the total urine samples. Authors noted that exposure to Benzophenone-3 likely also occurred via food pathway or other unknown sources.	<sup>64</sup>
Benzophenone-3	20 subjects	Unknown - undefined sources	Human adipose fat samples collected during years 2003 to 2004.	High concentrations of Benzophenone-3 (maximum of 4940 ng/g wet weight) detected. Results suggest that adipose tissue is important repository for Benzophenone-3 in human body.	<sup>65</sup>
Benzophenone-3	24 subjects	Unknown - undefined sources	Postmortem brain material (hypothalamus and white-matter tissue) analyzed for presence of Benzophenone-3. Limit of detection was 0.18 ng/g.	In the hypothalamus, the mean amount (n = 24) of Benzophenone-3 was below the limit of detection. In the white-matter, the mean amount (n = 10) of Benzophenone was 0.32 ng/g.	<sup>66</sup>
Benzophenone-3 and 4,4'-dihydroxybenzophenone	79 mothers (71 primiparous and 8 multiparous nursing) in Spain	Unknown - undefined sources	Study on human UV filters in human breast milk performed, Milk samples provided from day 1 up to 31 months after childbirth. Between April and October of 2014, individual breast milk samples obtained. Most samples collected 4-6 months after delivery.	Percentage of samples that contained UV filters was 24%; two of the major contributors were Benzophenone-3 (779.9 ng/g milk) and its metabolite, 4,4'-dihydroxybenzophenone (73.3 ng/g milk). Additionally, plastic containers for the milk had high concentrations (up to 10.6 µg/g plastic) of Benzophenone-3 and 4,4'-dihydroxybenzophenone.	<sup>67</sup>
Benzophenone-3	40 women undergoing mastectomy for breast cancer	Unknown - undefined sources	Concentrations of UV filters in breast tissue (3 serial locations within) measured. Tissue samples collected between 2005 and 2008. For ethical reasons, cancerous tissue unavailable, but location of cancer was known. Mann-Whitney U-tests used to investigate any link between chemical concentration and whether or not a tumor was present in that region.	Benzophenone-3 measured in 83 of 120 (69%) tissue samples, and at least 1 breast region for 33 of 40 women (range: 0 to 26 ng/g tissue). Spearman's analyses showed statistically significant positive correlations between concentrations of Benzophenone-3 in each of the 3 breast regions. In the lateral region, more Benzophenone-3 was measured when a tumor was present (P = 0.007).	<sup>68</sup>

**Table 6. Acute toxicity studies**

<b>Ingredient</b>	<b>Animals</b>	<b>No./Group</b>	<b>Vehicle</b>	<b>Concentration/Dose/Protocol</b>	<b>LD<sub>50</sub>/Results</b>	<b>Reference</b>
<b>DERMAL</b>						
Benzophenone-3	Wistar albino rats	12 males and 12 females	Sunscreen formulation	0.6% to 0.9%. OECD TG 402. Formulation (2000 mg/kg) applied to 2" x 2", 4-ply gauze pad, and patch placed (secured with surgical tape) on hairless, dorsal skin. Patch remained in place for 24 h. Animals observed for 14 d, after which animals killed.	No statistically significant changes in terminal bw between test and controls. Hematological and serum biochemistry parameters normal. No abnormalities at necropsy or microscopic examination. LD <sub>50</sub> > 2000 mg/kg.	69
Benzophenone-3	New Zealand rabbits	6 males	Sunscreen formulation	0.6% to 0.9%. OECD TG 404. Formulation applied to 25 cm <sup>2</sup> area of dorsal skin, using 2" x 3", 4-ply gauze pad (secured with surgical tape). 72-h application period.	Systemic toxicity not observed.	69
Benzophenone-12	Albino rabbits	5 rabbits	Water	10,000 mg/kg. OECD TG 402. Applied, under an occlusive or semi-occlusive patch, for 24 h to skin. Patch removal followed by 7-d observation period.	No deaths, and no clinical signs or adverse findings. The LD <sub>50</sub> > 10,000 mg/kg.	5
<b>ORAL</b>						
Benzophenone-1	Rats	Number and strain not stated	Not stated	Details not stated	LD <sub>50</sub> = 8600 mg/kg. Practically non-toxic.	6
Benzophenone-3	Female Wistar albino rats.	10 rats	Sunscreen formulation in 0.5% carboxymethyl cellulose	0.6% to 0.9%. OECD TG 423. Formulation (2000 mg/kg) administered by gavage to 1 fasted rat. Thereafter, each 48 h, the same dose administered to 4 rats. 5 control rats. Dosing followed by 14-d observation period, after which animals killed. Following organs examined macroscopically: heart, lungs, liver, kidneys, and spleen.	All animals survived and gained normal; no clinical signs of toxicity observed. No evidence of gross abnormalities, adverse pharmacological effects, or abnormal behavior. LD <sub>50</sub> > 2000 mg/kg.	69
Benzophenone-8	Female Wistar rats of the CLR:(WI) strain	6 rats	Propylene glycol	Test substance (200 mg/ml) administered via gavage at dose of 2000 mg/kg. Dosing followed by 14-d observation period. Animals killed; macroscopic examinations performed.	None of the animals died. No treatment-related adverse effects. No evidence of macroscopic changes. The LD <sub>50</sub> > 2000 mg/kg.	8
Benzophenone-12	Male rats of the CF Nelson strain	10 rats	Water	20% suspension. Test substance administered at dose of 10,000 mg/kg. Dosing followed by a 7-d observation period.	None of the animals died. No clinical signs and no findings at necropsy. LD <sub>50</sub> > 10,000 mg/kg	5

**Table 7. Repeated dose toxicity studies**

<b>Ingredient</b>	<b>Animals/Group</b>	<b>Study Duration</b>	<b>Vehicle</b>	<b>Dose/Concentration</b>	<b>Results</b>	<b>Reference</b>
<b>DERMAL</b>						
Benzophenone-3	B6C3F <sub>1</sub> mice; 5 males and 5 females	2 wk	Acetone or lotion	0.5 to 8 mg applied topically.	Minimal, variable increases in liver and kidney weights, primarily in the higher dose groups.	70
Benzophenone-3	F344/N rats; 5 males and 5 females	2 wk	Acetone or lotion	1.25 to 20 mg applied topically	Small and variable increases in liver and kidney weights, reaching a statistical significance primarily in the higher dose groups.	70
Benzophenone-3	Male Sprague-Dawley rats; groups of 4 to 6	4 wk	Ointment base	100 mg/kg applied topically twice daily	Body weight, organ-to-bw ratios, and hematological and clinical chemistry parameters not affected. Pathological examinations revealed no significant changes between control and treated animals. No gross external abnormalities observed. Non-toxic to rats.	71
Benzophenone-3	Female Sprague-Dawley rats and their offspring	Adults: first to last day of pregnancy (~22 to 23 d). Offspring: from 43 to 56 d age	Cream	Adults received dermal applications (10% in cream; dose = 100 mg/kg) twice daily. At 21 d after birth, offspring (male and female) divided into groups of 5 males and groups of 5 females. From 43 to 56 d age, test substance administered dermally to male offspring.	Dosing of adult pregnant females did not significantly alter bw or cause apparent adverse effects, when compared to controls. No significant differences in bw and sex-ratio observed in offspring, when compared to controls.	55
<b>ORAL</b>						
Benzophenone-1	Male and female rats (number and strain not stated)	90 d	Unknown	Details relating to test protocol not stated	NOAEL of 236 ppm/d. Regarding organ toxicity endpoint, critical effects observed unspecified.	6
Benzophenone-3	B6C3F <sub>1</sub> mice (5 males and 5 females per group)	2 wk	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 ppm	Dose-related increase in liver weight, associated with hepatocyte cytoplasmic vacuolization. NOAEL for microscopic lesions was 6250 ppm.	70
Benzophenone-3	F344/N rats (5 males and 5 females per group)	2 wk	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 ppm	One high-dose female rat died. Liver and kidney weights increased. Enlarged livers associated with marked hepatocyte cytoplasmic vacuolization at ≥ 6250 ppm. Renal lesions, consisting of dilated tubules and regeneration of tubular epithelial cells, found primarily in high-dose rats. NOAEL for microscopic lesions was 6250 ppm.	70
Benzophenone-3	B6C3F <sub>1</sub> mice (10 males and 10 females per group)	13 wk	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 ppm	Decreased, bw gains (dose-related). Mild increases in liver weights observed in dosed mice of both sexes. Kidney weights increased variably in dosed females. Microscopic lesions noted only in kidneys of males at 50,000 ppm: eosinophilic protein casts in dilated renal tubules and mild inflammation associated with dilated tubules. NOAEL for microscopic lesions of 6250 ppm.	70
Benzophenone-3	F344/N rats (10 males and 10 females per group)	13 wk	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 ppm.	Body weight gains of high-dose male and female rats reduced. Liver and kidney weights increased. Kidney lesions progressed to include papillary degeneration, or necrosis, and inflammation, while liver lesion appeared to regress. Liver enzymes in serum remained elevated. NOAEL for microscopic lesions of 6250 ppm.	70

**Table 7. Repeated dose toxicity studies**

Ingredient	Animals/Group	Study Duration	Vehicle	Dose/Concentration	Results	Reference
Benzophenone-3	Sprague-Dawley rats (10 male and 10 females per group)	14 wk	Feed	0 or 10,000 ppm	Mean bw of 10,000 ppm males not significantly different from control males, but mean bw of 10,000 ppm females significantly decreased, and was approximately 87% of control value. In males, absolute and relative liver and right kidney weights increased in 10,000 ppm group, compared to control group. In females, absolute kidney weight significantly decreased, and relative liver weight significantly increased, relative to control group. Incidence of mixed-cell cellular infiltration in liver significantly increased in 10,000 ppm males, relative to the control group. Cellular infiltrates composed of mononuclear cells with scarce neutrophils, and had no specific predisposition to specific area of liver lobule. Unlikely that cellular infiltrates, all of minimal severity, would be responsible for changes in liver weights observed in male rats at this time point. No other histologic findings observed that would explain differences in organ weights, but in females, bw changes could have influenced absolute kidney weight decrease and relative liver weight increase. However, increase in relative liver weight in exposed females accompanied by nonsignificant absolute liver weight increase. Unlikely that bw was responsible for liver weight change. Transcriptome analysis was performed on RNA extracted from microarray study of male rat livers from 10,000 ppm and control groups. Observed effects on transcription consistent with mild induction of xenobiotic metabolism-related processes, likely related to observed liver weight increases. Analysis of subset of estrogen-responsive genes showed no change in response to Benzophenone-3.	72
Benzophenone-4	Groups of 26 Wistar rats (13 males, 13 females/group).	48 d of dosing (males); 66 d of dosing (females)	Corn oil	OECD TG 422. 0, 750, 1000, and 1250 ppm/d (by gavage). Male rats were treated 2 wk before mating and thereafter. Female rats treated 2 wk before mating, and during mating, gestation, and lactation. Recovery groups of male and female rats (5/sex/dose) treated at 0 or 1250 ppm bw/d for 66 d total. Animals in recovery groups allowed to recover for 2 wk after final dose given.	No morbidity observed during dosing period. No test substance-related mortalities. Clinical findings sporadic and of no biological significance. Body weight changes restricted to statistically significant decrease in % bw change in recovery group of male rats treated at 1250 ppm from day 1 – 22, as compared to the control group. This effect on bw was considered incidental and not test substance-related. Food consumption unaffected by treatment. Observed changes in hematology and clinical chemistry not of toxicological importance. Detailed clinical examinations and microscopic examination of eyes, with optic nerve (in 0 and 1250 ppm groups), did not reveal abnormalities. Hormonal data showed no significant effects on concentrations of T4 or TSH (male and females), testosterone (males), or E2 (females). No significant effects on either the absolute or relative weight of brain, adrenals, heart, liver, kidneys, spleen, thymus, thyroid with parathyroid, testes, or epididymides. All adult animals were normal externally. Visceral findings included case of mild splenic enlargement at 1000 mg/kg and one case of mild testicular shrinkage at 1250 ppm. Microscopic examination revealed no treatment-related effects, that is, incidences and types of lesions observed at 1250 ppm comparable to concurrent control groups. In recovery groups, no morbidity was observed during the study, and any mortalities observed were due to gavage error. NOAEL (systemic toxicity) established at 1250 ppm/d for male and female rats.	7
Benzophenone-12	Groups of 6 male rats (Carworth Farms Elias strain)	35 d	Feed	OECD TG 417. Concentrations of 1.25% and 5% daily	No significant gross lesions observed in rats killed on day 11, 22, or 35. No lesions of liver or kidneys at histological examination.	5



**Table 7. Repeated dose toxicity studies**

Ingredient	Animals/Group	Study Duration	Vehicle	Dose/Concentration	Results	Reference
Benzophenone-12	Groups of Wistar rats (F <sub>0</sub> animals: 12 males, 12 females/group)	Premating to post-weaning.	0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80	OECD TG 416. Doses of 100, 300, and 1000 ppm/kg/d, administered by gavage during 10-wk pre-mating period (males), 2-wk pre-mating period (females), 2-wk mating period (both sexes), ~2 d post-mating (males), entire gestation period, up to 30 d of lactation (corresponding to 21 d of lactation and up to 9 d post-weaning), and 35 d post-mating (for sperm-negative females). Pups from the F <sub>1</sub> litter were selected (F <sub>1</sub> rearing animals) for specific post-weaning examinations. The study was terminated with the terminal sacrifice of the F <sub>1</sub> rearing animals. All F <sub>0</sub> parental animals were also killed. Gross necropsy and histopathological examination performed on animals killed.	No treatment-related gross pathological or histopathological findings; no deaths. No clinical signs or changes in general behavior observed in male or female F <sub>0</sub> parental animals of any dose group. No treatment-related bw changes or effects on food consumption. No hematological findings or treatment-related clinical biochemical findings. NOAEL of 1000 ppm/d for general, systemic toxicity.	<sup>5</sup>

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
<b>EMBRY/OVARY CULTURES</b>						
Benzophenone-3	Zebrafish embryos (40 per test concentration)	DMSO	0.438 µM, 5.35 µM, 21.9 µM, 30.7 µM, 52.3 µM, 78.9 µM, and 116 µM	Modified OECD TG 236. Fish embryotoxicity test (4 replicates). Dosing up to 120 h post-fertilization, because this period includes time points at which different developmental states can be observed. The positive control was 3,4-dichloroaniline (24.7 µM), and water served as the negative control. DMSO served as the solvent control. Endpoints evaluated: mortality, malformations, hatching, and inflation of the swim bladder.	Cumulative mortality under 10% in negative and solvent control groups at the end of the experiment. In positive control group, cumulative mortality of 75%. In negative and solvent control groups, percentage of hatched embryos was 95%. No hatched embryos observed in positive control group. Except for one in solvent control group (no swim bladder was observed), no malformations in negative and solvent control groups. LC <sub>50</sub> values reported: 76.6 µM (at 72 h post-fertilization), 69.8 µM (at 96 h), and 57.3 µM (at 120 h). At 0.438 µM, all embryos able to inflate swim bladder. At higher concentrations, absence of swim bladder inflation in concentration-dependent manner. EC <sub>50</sub> value of 29.5 µM after 120 h post-fertilization. At 72 h post-fertilization, deformation of tail observed (EC <sub>50</sub> = 41.9 µM). Malformation of somites at 52.6 and 78.9 µM. Decreased number of hatched embryos after 96 h post-fertilization (EC <sub>50</sub> = 54.3 µM). Other malformations observed, but frequency not concentration-dependent: pericardial and yolk sac edema, deformed jaw and ventricle or dilated gut, and jaw deformity. Benzophenone-3 caused mortality, unsuccessful hatching, and different malformations to zebrafish.	<sup>73</sup>

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
Benzophenone-3	Whole ovary cultures collected from Wistar rats. Ovaries (n = 120) collected from rats at birth (postnatal day 0).	DMSO	0.0058 $\mu$ M, 0.276 $\mu$ M, 0.576 $\mu$ M, and 0.876 $\mu$ M.	Effect on follicular assembly studied. Pups from the same litters were randomly assigned to different treatment groups so that each group contained ovaries of different pups from different litters. ovary cultures were treated for 7 d. Vehicle control cultures were treated with 0.01% DMSO. Positive control cultures were treated with the estrogen receptor $\beta$ (ESR2) antagonist, 4-(2-phenyl-5,7-bis(trifluoromethyl)pyrazolo-1,5- $\alpha$ -pyrimidin-3-yl)phenol (PHTPP) in DMSO.	Exposure to 0.0058 $\mu$ M decreased the population of total oocytes, number of nests per ovary, and number of early primary follicles. 0.0058 $\mu$ M stimulated process of germ cell nest breakdown and caused decrease in reserve of total oocytes. 0.276 $\mu$ M increased population of total oocytes and number of nests per ovary, but decreased number of primary follicles. At 0.576 $\mu$ M and 0.876 $\mu$ M, no changes observed in number of oocytes, germ cell nests per ovary, and assembled follicles in ovaries.	74
<b>DERMAL</b>						
Benzophenone-3	B6C3F <sub>1</sub> mice (10 males and 10 females per group)	Acetone	22.75 to 364 mg/kg	13-wk dermal dosing study	Epididymal sperm density decreased (whether or not statistically significant not stated) at all 3 dose levels evaluated (22.75, 91.0, and 364.0 mg/kg). Not possible to establish NOAEL for decreased epididymal sperm density. In female mice, no significant difference in estrous cycle length between control group and each dose group.	75
Benzophenone-3	Pregnant mice (number not stated)	Olive oil	50 mg/kg/d	Exposed dermally from GD 0 to 6. High-frequency ultrasound imaging was used to follow fetal and placental growth in vivo. Blood flow parameters in uterine and umbilical arteries were analyzed by Doppler measurements. Mice killed on GD 5, 10, and 14 (during first pregnancy), and on GD 10 and 14 (during second pregnancy). Benzophenone-3 levels analyzed in serum and amniotic fluid.	Dosing resulted in reduced fetal weight at GD 14 and fetoplacental index (first pregnancy), with 16.13% of fetuses under 5th percentile; uterine artery parameters showed altered pattern at GD 10. Benzophenone-3 detected in serum 4 h after exposure on GD 6, and in amniotic fluid, on GD 14. Weight of offspring of first progeny lower in test group. Placental weights in test group decreased in second pregnancy. First and second progenies of exposed mothers showed higher percentage of females (female sex ratio). Dermal exposure during early pregnancy resulted in intrauterine growth restriction. (IUGR) phenotype, disturbed sex ratio, and alterations in the growth curve of the offspring in the mouse model.	76
<b>ORAL</b>						
Benzophenone-1	Female rats (number and strain not stated)	Unknown	100 mg/kg/d. Other administered doses not stated	Oral dosing for 3 d.	NOAEL of 100 mg/kg/d. Any reproductive effects observed not specified.	6
Benzophenone-2	Groups of 5 timed pregnant C57BL/6NCr mice.	10% ethanol/90% corn oil vehicle	6.25 mg/d	Administered via gavage on GD 12 through 17. Control pregnant mice dosed with vehicle only. Animals killed on GD 18. Anogenital distance in male fetuses measured and genital tubercles examined histologically. Quantitative reverse transcriptase-polymerase chain reaction analysis of genes purportedly involved in genital tubercle development also performed. Also co-administration of Benzophenone-2 with estrogen receptor antagonist (10 $\mu$ g in vehicle (s.c.) during gestation,	In the test group, 8 of 57 male fetuses had hypospadias (p = 0.0064, when compared to controls). No changes in body mass-adjusted anogenital distance. Co-administration of Benzophenone-2 with estrogen receptor antagonist yielded normal genital tubercles; i.e., no hypospadias in 26 of 26 mice. Hypospadias was not observed after dosing with the estrogen receptor antagonist only or after dosing with vehicle only. Reverse transcriptase-polymerase chain reaction analysis showed that genital tubercles of treated male mice had higher levels of estrogen receptor- $\beta$ , when compared to male controls (p = 0.04). Results indicated that Benzophenone-2 may cause hypospadias via signaling through estrogen receptor.	77

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
Benzophenone-3	Swiss CD-1 mice	Feed	1.25%, 2.5%, and 5.0% (w/w)	Continuous breeding protocol. Male and female mice continuously exposed for a 7-d precohabitation and a 98-d cohabitation period. F <sub>1</sub> generation from control, 2.5%, and 5.0% groups weaned for second generation studies.	Feed consumption in the 2.5% and 5.0% groups consistently higher, but F <sub>0</sub> bw consistently lower. These findings suggest that Benzophenone-3 may be adversely affecting metabolism or digestive process. In 2.5% and 5.0% dose groups, number of live pups per litter significantly reduced. During lactation and nursing of F <sub>1</sub> pups, pup survival significantly below control value in 2.5% and 5.0% groups. Minimal effects on fertility in F <sub>1</sub> generation, but pup weights significantly reduced. Epididymal sperm motility, sperm count, and percentage of abnormal sperm not affected by treatment. No apparent effects on estrual cyclicity or the average estrous cycle length in treated females. Results indicated that Benzophenone-3 caused systemic toxicity, but had minimal effects on fertility and reproduction.	<sup>78</sup>
Benzophenone-3	B6C3F <sub>1</sub> mice (10 males and 10 females per group)	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 mg/kg	13-wk oral dosing study	Mice in the highest dose group (50,000 mg/kg in feed) exhibited a decrease in epididymal sperm density and an increase in length of the estrous cycle.	<sup>70</sup>
Benzophenone-3	3 groups of mated BALB/c female mice	Tocopherol-stripped corn oil	0.03 mg/kg/d, 0.212 mg/kg/d, and 3 mg/kg/d	Oral dosing from pregnancy day 0 until the day before weaning (lactational day 21). Sample sizes for treatment groups were: 0.03 mg/kg/d (10 litters), 0.212 mg/kg/d (11 litters), and 3 mg/kg/d (9 litters). Sample size for controls was 11 litters. Pups were weaned on postnatal day 21 and co-housed with same-sex animals of the same treatment group for the remainder of the experiment.	Developmental exposures reduced size and growth of mammary gland in males prior to (at postnatal day 21, statistically significant reduction) and during puberty (reduction not statistically significant). In females, reduced mammary cell proliferation (statistically significant at 0.03 mg/kg/d), decreased number of cells expressing estrogen receptor $\alpha$ (statistically significant at 0.03 or 0.212 mg/kg/d), and altered mammary gland morphology (dose response) in adulthood. In males, anogenital index reduced after exposure to 0.03 and 0.212 mg/kg/d at postnatal day 21 and in puberty. In adult males, no differences in anogenital distance observed. No effect on male bw observed. In females, anogenital index unaffected at postnatal day 21, but decreased (at 0.212 mg/kg/d) when measured at puberty. No effects on female anogenital index observed in adulthood.	<sup>79</sup>
Benzophenone-3	F344/N rats (10 males and 10 females per group)	Feed	0, 3125, 6250, 12,500, 25,000, or 50,000 mg/kg	13-wk oral dosing study.	Rats receiving diet with 50,000 mg/kg showed markedly lower epididymal sperm density and an increase in the length of the estrous cycle at the end of the study.	<sup>70</sup>
Benzophenone-3	Groups of 25 mated Wistar rats of the CrI:WI (Han) strain.	Corn oil	40, 200, and 1000 mg/kg/d	OECD TG 414. Dosing once daily (by gavage) on days 6 through 19 post-coitum. Dose volume of 5 ml/kg. Animals killed on day 20.	All fetal pathological findings were indicative of a minor disturbance and delay in ossification at the highest dose tested (1000 mg/kg/d). No test substance-induced effects on fetal morphology were observed at doses of 40 or 200 mg/kg/d. In all dose groups, was scattered occurrence of few external, soft tissue, and skeletal malformations without a consistent pattern. Findings also occurred without clear dose-response relationship and/or incidence, and not test substance-related. External variations not observed in any fetuses. Authors concluded that Benzophenone-3 did not possess any selective teratogenic properties. NOAEL of 200 mg/kg/d.	<sup>9</sup>

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
Benzophenone-3	Groups of 25 pregnant Sprague-Dawley rats	Chow (for pregnant females) and chow and milk (for male offspring)	3000 or 30,000 mg/kg	Dosing from GD 6 until postnatal day 21. Male offspring weaned on postnatal day 28 and then dosed with same concentrations. Animals killed on postnatal day 30. Controls received diet without test substance	Daily observation of male offspring did not reveal any clinical observations related to perinatal exposure. At necropsy on postnatal day 30, bw 22% lower in 30,000 mg/kg group when compared to control group. Rats exposed perinatally to 30,000 mg/kg also had statistically significantly lower weights of paired-testis, paired-epididymis, and prostate. These weights lower in males exposed to 30,000 mg/kg when compared to controls (26%, 17.6%, and 18.5%, respectively). Paired-testis weight to bw ratio also statistically significantly lower in 30,000 mg/kg group; however, no changes in relative weights of paired epididymis and prostate in 30,000 mg/kg group. Rats exposed did not have differences in seminal vesicle weight. Serum testosterone concentrations in rats exposed perinatally to 3000 and 30,000 mg/kg Benzophenone-3 were 13.5% and 28.3% lower when compared to controls, with statistical significance obtained in the 30,000 mg/kg Benzophenone-3 exposure group. Also, liver and paired-kidney weights lower in dose-dependent manner in 30,000 mg/kg group, attaining statistical significance. However, relative liver and paired-kidney weights similar to controls.	80
Benzophenone-3	Groups (7 to 8 animals per group) of mated female Sprague-Dawley rats	low-phytoestrogen chow	1000; 3000; 10,000; 25,000; or 50,000 mg/kg.	Feeding from GD 6 until weaning on postnatal day 23. Control group fed low-phytoestrogen chow only.	No exposure-related clinical signs were observed. On GD 10, 15, and 20, the bw of dams decreased in a dose-dependent manner. Absolute and relative kidney weights in dams statistically significantly higher in 50,000 mg/kg exposure group, when compared to control group. Exposure associated with reduced body and organ weights (kidney) in male and female offspring. No statistically significant differences in mean number of implantation sites/litter, mean resorptions per litter, % litters with resorptions, number and weights of live fetuses, or sex ratios between control and dose groups. One fetus in 50,000 mg/kg group had hydrocephaly, but no other malformations. Normalized anogenital distance in male pups at postnatal day 23 decreased in 50,000 mg/kg exposure group. Exposure to 50,000 mg/kg also caused impairment of spermatocyte development in testes of male offspring. In females, follicular development delayed in 50,000 mg/kg exposure group. Authors concluded that few adverse effects in dams and offspring dosed maternally and lactationally at 10,000 mg/kg or less. At higher concentrations, possible that dosing produced delay in postnatal growth, which could have adversely affected reproductive organ development; however, this is not clear. Authors noted that further work needed to clarify possible decreases in spermatogenesis and folliculogenesis observed.	40

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
Benzophenone-3	Groups of 42, 35, 35, and 43 F <sub>0</sub> time-mated female Sprague-Dawley rats	Feed	Dietary concentrations of 1000, 3000, and 10,000 ppm Benzophenone-3 resulted in average daily doses of approximately 70, 206, and 660 mg Benzophenone-3/kg bw/d during gestation, and 157, 478, and 1609 mg/kg/d over lactation days 1 - 14.	39-d feeding period, beginning on GD 6. Groups of 50 (1000 and 3000 ppm) or 60 (0 and 10,000 ppm) F <sub>1</sub> rats per sex continued on study after weaning, and were fed diets containing same concentrations for 105 wk; 10 F <sub>1</sub> rats per sex from 0 and 10,000 ppm groups were evaluated at 14 wk.	Gestation bw of dams receiving 10,000 ppm slightly lower (~3%) than those of control group and showed statistically significant differences. Dams receiving 3000 or 10,000 ppm displayed slight decreases in GD 6 - 21 bw gain (~10%) relative to control group, which attained statistical significance. Lower bw gain over GD 6 - 9 (10,000 ppm) and 18 - 21 (3000 and 10,000 ppm) intervals, which was associated with slightly lower feed consumption over GD 18 - 21 interval. Authors noted that these collective effects are minimal and would not be expected to affect normal development of offspring. Dosing had no effects on percentage of mated females producing pups, litter size, pup sex distribution, or numbers of male or female pups. Authors noted that decrease in percentage of females pregnant in 10,000 ppm group can be attributed to 7 animals with no evidence of pregnancy, as shown by absence of implantation sites. Therefore, lower pregnancy rate not exposure-related, given that exposure began after implantation. Dams dosed did not display any adverse clinical findings before or after parturition. Litter size of 10,000 ppm group slightly lower on postnatal days 7 and 10.	<sup>72</sup>
Benzophenone-4	Groups of 26 Wistar rats (13 males, 13 females/group)	Corn oil	750, 1000, and 1250 mg/kg/d	OECD TG 422. Male rats treated 2 wk before mating and thereafter for total of 48 d of dosing (by gavage). Female rats treated 2 wk before mating, during mating, during gestation and during lactation, for total of ~ 63 d of dosing. Control rats dosed with corn oil only. Recovery groups of male and female rats (5/sex/dose) treated at 0 or 1250 mg/kg bw/d for 66 d total. Animals in recovery groups allowed to recover for 2 wk after final dose given.	No morbidity observed. Estrous cyclicity unaffected by treatment. All females showed evidence of copulation after cohabitation/mating period. Pregnancy rates of 77, 62, 77, and 77% at 0, 750, 1000, and 1250 mg/kg, respectively. No significant effects observed on gestation length or litter size. Likewise, no significant effects were observed on the number of live births, pup survival, pup weight or sex ratio. Four pups in 750 mg/kg dose group cannibalized. All other pups at 0, 750, 1000, and 1250 mg/kg normal externally. Internal examination of pups revealed no test substance-related abnormalities. Microscopic examination of pups' thyroid and parathyroid glands in 0 and 1250 mg/kg dose groups revealed no abnormalities. NOAEL (reproductive toxicity) of 1250 mg/kg/d.	<sup>7</sup>
Benzophenone-12	Groups of 50 Wistar rats (25 males (for mating), 25 females)	0.5% carboxymethyl-cellulose suspension in drinking water + 5 mg/100 ml Tween 80	100, 300, and 1000 mg/kg/d.	Administered (gavage) to mated females from implantation 1d prior to expected day of parturition (GD 6 to 19). Female rats killed on GD 20, and fetuses removed from uterus.	Neither clinical signs nor effects on bw (or organ/bw ratios) were observed. No test substance-related necropsy findings were observed after dosing of dams. No evidence of dead/aborted fetuses or pre- and post-implantation loss. Test substance-related external, skeletal, or visceral malformations not observed. NOAEL (for maternal and prenatal developmental toxicity) of 1000 mg/kg/d.	<sup>5</sup>

**Table 8. Developmental and reproductive toxicity studies**

Test Article	Animals/Group	Vehicle	Dose/Concentration	Procedure	Results	Reference
Benzophenone-12	Groups of Wistar rats (F <sub>0</sub> animals: 12 males, 12 females/group)	0.5% carboxymethylcellulose suspension in drinking water + 5 mg/100 ml Tween 80	100, 300, and 1000 mg/kg/d.	Administered (gavage) as follows: 10-wk pre-mating period (males), 2-wk pre-mating period (females), 2-wk mating period (both sexes), ~2 d post-mating (males), entire gestation period, up to 30 d (corresponding to 21 d of lactation and up to 9 d post-weaning), and 35 d post-mating (for sperm-negative females). Control group (12 males, 12 females) dosed with vehicle only. Pups from F <sub>1</sub> litter selected (F <sub>1</sub> rearing animals) for specific post-weaning examinations. Terminal sacrifice of F <sub>1</sub> rearing animals. All F <sub>0</sub> parental animals also killed.	Clinical examinations of F <sub>0</sub> parental animals did not reveal test substance-related adverse findings, and no effects on reproductive performance. No test substance-related adverse findings at clinical or gross examination of F <sub>1</sub> pups. For F <sub>1</sub> rearing animals, no test substance-related findings during clinical examinations and sexual maturation, and no gross findings. NOAEL (for reproductive performance and fertility of F <sub>0</sub> parental rats and developmental toxicity in offspring) of 1000 mg/kg/d.	5

**Table 9. Genotoxicity studies**

Test Article	Concentration/Dose	Vehicle	Test System	Procedure	Results	Reference
<b>In Vitro</b>						
Benzophenone-1	1-25 µg/ml	Culture medium	Human keratinocytes (HaCaT cells).	Photo-genotoxicity of Benzophenone-1 and apoptotic parameters assessed by western blot, immunocytochemistry, flow cytometry, the comet assay (for DNA damage), and transmission electron microscopy (TEM) imaging. Apoptotic cells detected by annexin V/pro-propidium iodide (PI) staining and sub G1 population of cell cycle. Annexin V is a protein that is commonly used to detect apoptotic cells. PI is a fluorescent agent that is used to stain cells.	Benzophenone-1 photosensitized and generated intracellular reactive oxygen species (2.02 folds) under sunlight/UV radiation. Decrease in cell viability was recorded as 80.06%, 60.98%, and 56.24% under sunlight, UVA, and UVB, respectively. Benzophenone-1 enhanced lipid peroxidation, and leakage of lactate dehydrogenase (LDH) enzyme (61.7%). Benzophenone-1 induced upregulation of apoptotic proteins Bax/Bcl2 ratio, Apaf-1, cytochrome c, Smac/DIABLO, and cleaved caspase3 observed.	81
Benzophenone-1	5-25 µg/ml	Culture medium	HaCaT cells	HaCaT cells treated with Benzophenone-1 in presence of UVB (1.08 J/cm <sup>2</sup> ) or UVA (2.7 J/cm <sup>2</sup> ). Genotoxicity potential of Benzophenone-1 confirmed through photo-micronuclei and cyclobutene pyrimidine dimers (CPDs) formation (detected using immunostaining and fluorescence microscopy).	Immunostaining results showed maximum CPD formation by Benzophenone-1 at a concentration of 25 µg/ml (in presence of UVB). CPD formation not observed in control cells (exposed in dark or in light). Micronuclei formation detected in HaCaT cells treated with 10 µg/ml in presence of UVB. Simultaneously, micronuclei not detected in control cells exposed in dark or in light. Maximum tail DNA (29.1%) recorded at 25 µg/ml, compared to control value of 4.8%. Cells exposed to different concentrations in presence of UVA (2.7 J/cm <sup>2</sup> ) exhibited statistically significant (p > 0.01) DNA damage when compared to control cells. Similarly, highest olive tail moment (OTM) of 3.57 units recorded at concentration of 25 µg/ml (with UVA irradiation), when compared to control cells (0.54 units). Results indicated that Benzophenone-1 induced photogenotoxicity and apoptosis via the release of cytochrome c and Smac/DIABLO.	81

Table 9. Genotoxicity studies

Test Article	Concentration/Dose	Vehicle	Test System	Procedure	Results	Reference
Benzophenones -1, -3, -6, and -8	Benzophenone-1 (doses up to 600 µg/plate), Benzophenone-3 (up to 200 µg/plate), Benzophenone-6 (up to 2000 µg/plate), and Benzophenone-8 (up to 300 µg/plate)	DMSO	<i>S. typhimurium</i> strains TA98 and TA100 (with and without metabolic activation).	Ames test. Benzo[a]pyrene (BaP) was positive control (with activation), and 2-(20-furyl)-3-(5-nitro-2-furyl) acrylamide (AF2) was positive control (without activation).	None of test substances produced clear positive results with or without metabolic activation. Results classified as negative.	82
Benzophenones -1, -3, -6, and -8	Doses up to 10 µg/well	DMSO or methanol	<i>S. typhimurium</i> strain TL210	Luminescent <i>umu</i> -test	Positive results for Benzophenone-3 and pseudo-positive results for Benzophenone-1 and Benzophenone-8.	82
Sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%)	5000 µg/plate	Sunscreen	<i>S. typhimurium</i> strains: TA 98, TA100, TA1535 and TA1538 (with and without metabolic activation)	Ames test. Positive controls: sodium azide, 2-nitrofluorene, and 2-aminofluorene	No observable increase in number of revertant colonies with or without metabolic activation. Benzophenone-3 was non-genotoxic. Positive controls were genotoxic.	69
Benzophenone-3	Doses up to 6000 µg/plate		<i>S. typhimurium</i> strains TA98 and TA100, and <i>Escherichia coli</i> strain <i>uvrA</i> pKM101	Ames test (with and without metabolic activation)	Non-genotoxic with and without metabolic activation.	72
Benzophenone-3	0.20 µg/ml, 0.10 µg/ml, 0.05 µg/ml, 0.025 µg/ml, and 0.0125 µg/ml	DMSO	Human peripheral lymphocytes	Chromosomal aberrations (24-h exposure) assay. Positive control (mitomycin C)	Benzophenone-3 induced following 7 types of structural chromosomal aberrations in the chromosomal aberrations assay: gaps, chromatid and chromosome breaks, dicentric chromosomes, rings, tri- or tetra-radials, acentric fragments, and rearrangements. Most frequent aberrations were acentric fragments and chromatid aberrations; numerical aberrations not found. Statistically significant increase in chromosomal aberrations and aberrant cell frequencies at all test concentrations, when compared to solvent control. No statistically significant differences between the solvent and untreated control cultures were observed. Positive control caused statistically significant increase in chromosomal aberrations and aberrant cell frequencies (when dose-response also observed), considering that regression analysis revealed statistically significant ( $p < 0.001$ ) correlation between Benzophenone-3 concentrations and level of genomic damage, compared to all test concentrations of Benzophenone-3 and negative and untreated controls.	84
Benzophenone-3	0.20 µg/ml, 0.10 µg/ml, 0.05 µg/ml, 0.025 µg/ml, and 0.0125 µg/ml	DMSO	Human peripheral lymphocytes	Micronuclei (48-h exposure) assay. Positive control (mitomycin C)	Benzophenone-3 caused statistically significant increase in micronuclei formation at all test concentrations. A dose-response was also observed, considering that a regression analysis revealed a statistically significant correlation ( $p < 0.001$ , compared to negative control) between Benzophenone-3 concentrations and frequencies of micronuclei and cells with micronuclei. Results for vehicle, untreated, and positive controls were same as those reported in chromosome aberrations assay above.	84

**Table 9. Genotoxicity studies**

Test Article	Concentration/Dose	Vehicle	Test System	Procedure	Results	Reference
Benzophenone-3	1 µM and 5 µM		Human breast epithelial cells.	DNA damage assay. Immunostaining with antibodies against markers of DNA damage, γ-H2AX (phosphorylated histone H2AX) and p53-binding protein 1 (53BP1).	Benzophenone-3 increased DNA damage in manner similar to E2, and in an estrogen-receptor alpha (ERα)-dependent manner. However, Benzophenone-3 had limited transactivation of target genes at same 2 concentrations. Exposure caused R-loop formation in normal human breast epithelial cell line when ERα introduced. Authors concluded that Benzophenone-3 induces DNA damage, mediated by formation of ERα-dependent R-loops at concentrations 10-fold lower than those required for transactivation.	<sup>85</sup>
Benzophenone-3 and Benzophenone-8	4 to 10 µl per plate	Seawater	<i>S. typhimurium</i> strain TA98 (without metabolic activation).	Ames test. Positive control was 2,4,7-trinitrofluorene	Neither ingredient was genotoxic. Positive control was genotoxic.	<sup>83</sup>
Benzophenone-3 and Benzophenone-8	Each ingredient (chlorinated, doses up to 10 µl per plate) tested in seawater at ratios of 1:10 and 1:1000.	Chlorinated bromide-rich water (artificial seawater)	<i>S. typhimurium</i> strain TA98 without metabolic activation.	Ames test. Positive control was 2,4,7-trinitrofluorene	Only Benzophenone-8 (1:10) had clear genotoxic activity that was dose-related (doses of 4, 6, 8, and 10 µl). No genotoxic activity observed for either ingredient at a ratio of 1:1000. Positive control was genotoxic.	<sup>83</sup>
Benzophenone-8	0.008 to 700 µg/plate	Ethanol	<i>S. typhimurium</i> tester strains: TA98, TA100, TA1535, TA1537, and TA1538.	<i>Salmonella</i> /mammalian microsomes mutagenicity assay (with and without metabolic activation)	Benzophenone-8 caused weak, but reproducibly significant, increase in number of TA1537 revertants per plate. Increase was dependent upon increasing concentrations of the test substance, and was totally dependent on the presence of metabolic activation.	<sup>86</sup>
Benzophenone-8	Doses up to 1500 µg/plate (strain TA100) and up to 5000 µg/plate (strain WP2vurA)	DMSO	<i>S. typhimurium</i> strain TA100 and <i>E. coli</i> ( <i>E. coli</i> ) strain WP2vurA	OECD TG 471. Bacterial reverse mutation assay (with and without metabolic activation). Benzophenone-8 caused visible reduction in growth of the bacterial background lawns of both strains (with and without metabolic activation), initially from 500 µg/plate. Therefore, test substance evaluated up to either maximum recommended dose of 5000 µg/plate or the toxic limit (depending on the bacterial strain type).	No significant increases in frequency of revertant colonies were noted for either bacterial strain, at any dose level either with or without metabolic activation. Authors concluded that Benzophenone-8 was negative for genotoxicity.	<sup>8</sup>
Benzophenone-8	13 to 56 µg/ml	Ethanol	L5178Y TK+/- mouse lymphoma cells	L5178Y TK+/- mouse lymphoma mutagenesis assay (with and without metabolic activation)	Cultures treated without metabolic activation exhibited mutant frequencies not significantly different from those of solvent controls. Cultures treated with metabolic activation exhibited significant increase in mutant frequencies, and dose response evident. Two highest concentrations, 24 and 32 µg/ml, exhibited mutant frequencies that were 3.8 and 2.0 times greater, respectively, than average mutant frequency of solvent controls. Benzophenone-8 was genotoxic.	<sup>87</sup>
Benzophenone-12	Doses up to 50 µg/ml (with metabolic activation) and up to 52 µg/ml (without metabolic activation).	DMSO	Mouse lymphoma L5178Y cells	OECD TG 476. Mammalian cell gene mutation assay (with and without metabolic activation). Positive effect defined as doubling of mutant frequency over concurrent solvent-treated control value, together with evidence of dose-related increase.	Benzophenone-12 was non-genotoxic without metabolic activation. Results ambiguous with metabolic activation. Relative to these results (with metabolic activation), authors noted that a less than 3-fold increase in mutant frequency occurred at highly toxic concentrations.	<sup>5</sup>



Table 9. Genotoxicity studies

Test Article	Concentration/Dose	Vehicle	Test System	Procedure	Results	Reference
<b>In Vivo</b>						
Benzophenone-3	0, 3000, or 3500 mg/kg Benzophenone-3		Larva from a mating of "multiple wing hair" (mwh) females with heterozygous "flare" (flr) males ( <i>Drosophila melanogaster</i> )	<i>Drosophila</i> somatic mutation and recombination test (SMART). Test substance exposure for 72 h. Positive control: 25 mg/kg dimethylnitrosamine. A recombination between the mwh and flr genes produces twin wing spots, while events such as deletions produce single spots.	None of the Benzophenone-3-treated larva produced flies with significantly more single or multiple wing spots than controls. In contrast, DMN-treated larva produced flies with significantly more single or multiple wing spots than controls.	88
Benzophenone-3	0.6% to 0.9% (Doses of 500, 1000, and 2000 mg/kg)	Sunscreen formulation	Groups of 10 Wistar albino rats dosed prior to assay	OECD TG 474. Mammalian erythrocyte micronucleus test. Doses administered dermally (method not stated) for 2 consecutive days (at intervals of 24 h). Positive control group dosed i.p. with cyclophosphamide (0.04 g/kg); negative control group dosed dermally with placebo formulation (2 g/kg). At 48 h after first dose, all rats killed and bone marrow extracted from the femur. 200 erythrocytes in bone marrow cells of each animal used to score total number of mature and immature erythrocytes. Number of micronuclei per 2000 immature erythrocytes recorded.	Neither sunscreen formulation (all doses) nor placebo statistically significantly increased ratio of micronucleus polychromatic erythrocyte (MNPCE)/ polychromatic erythrocyte (PCE) and PCE/(PCE + normochromatic erythrocyte (NCE)). Positive control statistically significantly increased these ratios. Authors concluded that sunscreen (2 g/kg) did not statistically significantly increase number of micronucleated immature erythrocytes or systemic toxicity at 48 h, classifying sunscreen formulation as non-genotoxic.	69
Benzophenone-3	0.6% to 0.9%	Sunscreen formulation	Groups of 10 Wistar albino rats dosed prior to assay	Mammalian bone marrow chromosome aberration test (modification of OECD TG 475). Doses of the sunscreen, 500 mg/kg, 1000 mg/kg, and 2000 mg/kg, administered according to procedure stated immediately above. Same is true for positive and negative controls (cyclophosphamide and placebo formulation; same doses). Animals killed after dosing, bone marrow extracted from femur, and slides prepared. Light microscopy used to evaluate any evidence of chromosomal abnormalities.	No increment in the total number of aberrant cells or in the chromosome aberration percentage for the sunscreen formulation or placebo formulation observed. Positive control facilitated increase in number of aberrant cells. Authors concluded that sunscreen formulation was non-genotoxic.	69
Benzophenone-3	0.0, 500, 1670, or 5000 mg/kg		Sprague-Dawley rat bone marrow cells	In vivo cytogenetics assay to evaluate clastogenicity. Rats treated by oral gavage with single administration of each dose for 5 consecutive days. Cyclophosphamide (CP) was positive control, administered at dose of 20 mg/kg. Colchicine growth-arrested bone marrow cells collected 8 and 12 h after single treatment, and 12 h after last daily treatment.	Under either treatment protocol, none of the Benzophenone-3 concentrations caused significant increase in chromosomal aberrations.	88
Benzophenone-3	3 mg/kg/d	Tocopherol-stripped Corn oil	12 ovariectomized mice (Balb/c female mice) dose prior to assay	DNA damage assay. Mice exposed to Benzophenone-3 at 10 d after surgical procedure. 8 mice dosed orally with E2, and 12 mice dosed orally with Benzophenone-3 daily for 4 d. Each mouse administered 1 µl of tocopherol-stripped corn oil per gram of bw to deliver E2 (0.25 mg/kg/d) or Benzophenone-3 (3 mg/kg/d). Immunostaining of mouse mammary epithelium was performed to quantify R-loops and DNA damage in vivo.	Results indicated that R-loops and DNA damage detected in mammary epithelial cells of mice treated with Benzophenone-3. Authors concluded that acute exposure to Benzophenone-3 in mice induces DNA damage, mediated by formation of ERα-dependent R-loops at concentrations 10-fold lower than those required for transactivation.	85

**Table 10. Dermal irritation and sensitization studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
<b>IN CHEMICO / IN VITRO STUDIES</b>					
Sunscreen formulation composed of polymeric nanocapsules loading Benzophenone-3.	Benzophenone-3 (0.005 wt %)	Hen's egg (embryonated membrane)	The hen's egg-chorioallantoic membrane test (HET-CAM). Nanocapsules contained poly( $\epsilon$ -caprolactone), carrot oil, a non-ionic surfactant, and Benzophenone-3 (0.005 wt%). Eggs incubated for 10 d, after which membrane removed and CAM was exposed. Formulation then added on embryonated hen's egg membrane; effects studied for 300 s. As positive control (for vascular hemorrhage and lysis), 300 $\mu$ l of sodium hydroxide solution (0.1 M) applied. Sodium chloride solution (0.9 wt%) applied as a negative control. Diluted (distilled water) formulation (300 $\mu$ l) applied to eggs also. Assay monitored for any event (hemorrhage, lysis, and coagulation) for 300 s.	Formulation classified as non-irritant.	112
Benzophenone-4	25 mg	Three-dimensional human epidermis model	Dermal corrosion potential studied according to OECD TG 431. Before dosing, tissues moistened with sterile water (25 $\mu$ l). Solid test article evenly applied to apical surface of each tissue. Each treatment (test article or control) conducted in duplicate. Exposure period for test article and control was 3 and 60 min. For 60-min exposure, dosed tissues placed in incubator for remainder of 60-min exposure. MTT assay performed using tissues transferred to 24-well plates. Mean optical density for test chemical determined to be 2.098 and 0.315 for 3-min endpoint and 1-h endpoint, respectively. Mean % tissue viability, compared to the negative control (n = 3), determined to be 85.7 % and 13.4 % for 3-min endpoint and 1-h endpoint, respectively.	Benzophenone-4 considered corrosive to skin.	7
Benzophenone-8	up to 200 mM (in DMSO)	KeratinoSens cell line (immortalized adherent human keratinocyte cell line (HaCaT cell line), transfected with a selectable plasmid to quantify luciferase gene induction)	OECD TG 442D. In vitro antioxidant response element (ARE)-nuclear erythroid 2-related factor 2 (Nrf2) Luciferase test method. Experiment involved 2 independent runs. Maximal average fold induction of luciferase activity ( $I_{max}$ ) response for luciferase gene expression as well as sensitization potential determined. In both repetitions, induction of luciferase above threshold of 1.5 noted. $I_{max}$ was > 1.5-fold and statistically significantly different, as compared to negative control (DMSO).	Benzophenone-8 classified as positive. Authors stated that further testing is required, having noted that this test is part of tiered strategy for evaluation of skin sensitization potential.	8
<b>ANIMAL</b>					
Sunscreen formulation containing Benzophenone-3	0.6% to 0.9% in formulation (formulation dose = 2000 mg/kg)	Wistar albino rats (12 males, 12 females)	OECD TG 402. Dose applied to 2" x 2", 4-ply gauze pad, and patch placed (secured with surgical tape) on hairless, dorsal skin. Patch remained in place for 24 h.	No signs of erythema or edema.	69
Sunscreen formulation containing Benzophenone-3	0.6% to 0.9% in formulation	18 male New Zealand rabbits (3 groups of 6)	OECD TG 404. 3 groups: test, positive control (0.8% aqueous formaldehyde), and negative control (placebo sunscreen formulation), respectively. Each material applied to 25 cm <sup>2</sup> area of dorsal skin, using 2" x 3", 4-ply gauze pad (secured with surgical tape). Application period of 72 h, after which patches removed. Reactions scored for erythema and edema at 24 h, 48h, and 72 h; primary irritation index (PII) calculated.	No evidence of erythema or edema in test or placebo groups (PII = 0). Positive control was severely irritating (PII = 10.43). No signs of systemic toxicity.	69

**Table 10. Dermal irritation and sensitization studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Sunscreen formulation containing Benzophenone-3	0.6% to 0.9% in formulation	30 adult male guinea pigs (3 groups of 10)	OECD TG 406. One group treated with the sunscreen formulation. The other 2 groups were treated with 0.1% w/v 1-chloro-2,4-dinitrobenzene (CDNB) in 10% propylene glycol (positive control group) and a placebo formulation (cream base only, negative control group). Induction applications (sunscreen formulation, positive control, or placebo) made to the groups of animals. Inducing agents loaded on 2 cm x 4 cm filter paper secured with occlusive dressing. Observations relating to challenge reactions assessed after 24 h of induction, and reactions scored.	None of the animals treated with sunscreen formulation or placebo had sensitization reactions. Positive control induced skin sensitization. Authors classified sunscreen formulation as non-sensitizer.	<sup>69</sup>
Benzophenone-3	12.5%, 25%, and 50%	Groups of 4 female mice of the CBA strain	Applications (volume not stated) made to dorsum of each ear lobe on 3 consecutive days. No local findings or clinical signs of toxicity, and no mortalities. At 5 d after topical application, animals killed. Lymph nodes excised and single cell suspensions prepared. Incorporation of [ <sup>3</sup> H]methyl thymidine measured.	At each concentration, stimulation index less than limit criterion of 3. Benzophenone-3 classified as non-sensitizer.	<sup>9</sup>
Benzophenone-8	0.5 g in water (0.5 ml)	3 New Zealand white rabbits	The test substance applied to skin for 4 h using semi-occlusive patch. Reactions scored for up to 72 h post-application.	Skin irritation not observed in animals tested, and Benzophenone-8 classified as a non-irritant.	<sup>8</sup>
Benzophenone-12	Fine powder (0.5 g)	3 male New Zealand white rabbits	OECD TG 404. Test substance applied (abraded and intact skin of back) for 4 h under occlusive patch. Reactions scored at 24 h, 48 h, and 72 h after patch removal using Draize system. Modified PII calculated using 24-h and 72-h scores.	No evidence of erythema or edema during study (modified PII = 0); no clinical signs observed. Benzophenone-12 classified as non-irritating to skin of rabbits.	<sup>5</sup>
Benzophenone-12	Intradermal injection at induction: 5% in oleum arachidis (w/v), and 5% in the adjuvant/saline mixture (w/v). Induction patch application: 30% in petrolatum (w/w). Challenge patch application: 20% in petrolatum (w/w).	20 test (10 males, 10 females) and 10 controls (5 males, 5 females) guinea pigs of the Pirbright white (Tif:DHP) strain.	Maximization test. During first week of induction, intradermal injections (neck, 0.1 ml per injection; 3 pairs): adjuvant /saline mixture 1:1 (v/v), Benzophenone-12 (5%) in oleum arachidis (w/v), and Benzophenone-12 (5%) in the adjuvant/saline mixture (w/v). During the second week of induction (filter paper patch application), Benzophenone-12 (30%) in petrolatum (w/w) applied to the neck for 48 h (2 cm x 4 cm occlusive patch contained 0.4 g of paste). Control group was also treated during induction. Challenge phase (wk 5; i.e., 2 wk after induction) consisted of single, 24-h application of Benzophenone-12 (20% in petrolatum (w/w)). Test substance (0.2 g paste) applied to flank using 2 cm x 2 cm occlusive challenge patch. Reactions scored at 24 h and 48 h using Draize scale. During challenge, control group treated with vehicle and test substance to check for maximum sub-irritant concentration of test substance in adjuvant-treated animals.	Results indicated that 65% and 60% of animals sensitized to Benzophenone-12 under experimental conditions employed at 24 h and 48 h after challenge, respectively. Authors classified Benzophenone-12 as sensitizer.	<sup>5</sup>

**Table 10. Dermal irritation and sensitization studies**

<b>Test Article</b>	<b>Concentration/Dose</b>	<b>Test Population</b>	<b>Procedure</b>	<b>Results</b>	<b>Reference</b>
Benzophenone-12	Intradermal induction at 15% (in PEG 300 and in emulsion of Freund's Complete Adjuvant (FCA)/physiological saline); epidermal induction and challenge with 40% in PEG 300	10 test and 5 control female albino guinea pigs	Maximization test. Intradermal induction of sensitization in test group performed in nuchal region. Epidermal induction of sensitization conducted for 48 h under occlusion 1 wk after intradermal induction, and following pretreatment of test areas with 10% sodium lauryl sulfate (SLS) 23 h prior to application of test substance. Control animals intradermally induced with PEG 300 and FCA/physiological saline, and epidermally induced with PEG 300 under occlusion following pretreatment with 10% SLS. Two wk after epidermal injection, control and test animals challenged by epidermal application of test substance and PEG 300 alone under occlusive dressing. Cutaneous reactions evaluated at 24 h and 48 h after removal of dressing.	No toxic symptoms evident in test or control group. Seven of 9 surviving test animals had discrete/patchy to moderate/confluent erythema at the 24- and 48-h reading after challenge treatment with Benzophenone-12. No skin effect observed in control group. Benzophenone-12 classified as skin sensitizer.	<sup>116</sup>
<b>HUMAN</b>					
Benzophenone-4	2%, 5%, and 10% in petrolatum (20 µl dose of each applied)	80 subjects	Three concentrations tested on each subject. Dose applied to 8-mm diameter Finn chamber, secured with adhesive tape. Patches applied for 2 d to upper back. Reactions scored according to International Contact Dermatitis Research Group (ICDRG) grading scale.	Benzophenone-4 (5% in petrolatum) induced skin irritation in 4 subjects. Benzophenone-4 (10% in petrolatum) induced skin irritation in 6 subjects.	<sup>115</sup>

Table 11. Ocular irritation studies

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
<b>IN VITRO</b>					
Benzophenone-4	50 mg (solid)	MatTek EpiOcular™ model (normal human-derived keratinocytes in the 3-dimensional human tissue model; progressively stratified, but not cornified, cells)	OECD TG 492. MTT cytotoxicity assay. Exposure to Benzophenone-4 for ~ 6 h.	Tissue viability of Benzophenone-4 determined to be 3.6%. Benzophenone-4 classified as irritating to human eye	7
Benzophenone-8	20% w/v in paraffin oil (volume = 750 µl)	Corneas from 3 cattle	OECD TG 437. Bovine corneal opacity and permeability test. Corneas exposed to test substance for 4 h. Test substance then removed from front opening of the anterior chamber and epithelium was rinsed. For evaluation of corneal permeability, passage of sodium fluorescein dye measured using ultraviolet-visible (UV/Vis) spectrophotometry.	Benzophenone-8 did not cause corneal opacity or permeability, resulting in mean in vitro irritancy score of 1 after 4 h of exposure. Authors concluded that Benzophenone-8 not a severe irritant or corrosive agent.	8
<b>ANIMAL</b>					
Benzophenone-3	Sunscreen formulation containing Benzophenone-3 (0.6% to 0.9%) (100 mg)	3 adult New Zealand albino rabbits	Formulation instilled into conjunctival sac of right eye of each animal. After instillation, eyes examined macroscopically (in accordance with the Draize scale) at intervals of 24 h, 48 h, and 72 h, and daily from 4 to 10 d.	No signs of gross toxicity or adverse effects. Corneal opacity and iritis not observed during study. At 1 h post-instillation, conjunctival discharge observed in 1 of 3 eyes, but subsided within 96 h. Highest maximum mean total score (MMTS) value (0.67) for ocular irritation observed within 1 h after instillation, classifying sunscreen formulation as practically non-irritating to the eye.	69
Benzophenone-12	0.1 g	6 New Zealand white rabbits (3 males, 3 females)	OECD TG 405. Undiluted test substance instilled once, and ocular irritation evaluated on days 1, 2, 3, 4, and 7.	No evidence of ocular irritation (PII = 0).	5

**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenones-2 and-3	1% and 10% (in petrolatum)	11 patients (10 women, 1 man) with reactions due to sunscreen allergy (itchy bumps and burning)	Photopatch testing. Finn chambers (8 mm, secured with tape) containing filter paper wetted with test substance and applied to back. Chambers applied in duplicate for patch and photopatch testing. After 24 h, photopatches removed and one set irradiated with UVA (10 J/cm <sup>2</sup> ). Immediately after UVA exposure, photopatch tests read to determine immediate-type sensitivity reactions. Patch areas then covered with opaque tape material. Another reading made 24 h later (day 3), and final reading made at 5 to 7 d.	At reading immediately after UVA exposure, all reactions were negative, indicating absence of contact urticaria. One patient had delayed-type hypersensitivity photopatch test reaction to Benzophenone-2 (1% in petrolatum), and another patient had a photopatch test reaction to Benzophenone-3 (10% in petrolatum).	<sup>128</sup>
Benzophenone-3	2% (in petrolatum)	187 patients (76 males, 111 females) with history of photosensitivity	Over 6-year period, patients photopatch tested using standard techniques. Test substance applied in duplicate to patient's midback, on either side of the midline, using aluminum disks (Finn Chambers) and paper (Scanpor) tape. For first 2 testing periods (January 1985 through February 1987 and March 1987 through August 1989), test substance remained in place for 48 h. In 3 <sup>rd</sup> period (September 1989 through December 1990), test substance removed after 24 h. Test site then irradiated with UVA, 8 J/cm <sup>2</sup> (January 1985 through August 1989) or 10 J/cm <sup>2</sup> (September 1989 through December 1990). Site then covered with light opaque material (gauze pads and aluminum foil held in place with paper (Scanpor) tape). All sites evaluated for reactions at 48 hours post-irradiation. Second readings at day 7 post-irradiation done in third test period (September 1989 through December 1990). Second readings not done during first 2 test periods. Reactions graded on scale of ± to 3+.	Nine clinically relevant photoallergic contact dermatitis responses to Benzophenone-3 (2% in petrolatum).	<sup>123</sup>
Benzophenone-3	2% (in petrolatum)	355 consecutive patients with suspected photosensitivity	Study based on 7 years of testing (standard photopatch protocol) at 2 Swedish dermatology clinics	Results indicated 15 photocontact allergic reactions and 1 contact allergic reaction to test substance.	<sup>126</sup>
Benzophenone-3	3%	4094 patients with suspected allergic contact dermatitis	Patch tested by 12 North American Contact Dermatitis Group (NACDG) dermatologists, with screening series of 50 allergens. Patients patch tested (July 1, 1996 to June 30, 1998) using Finn chambers on Scanpor tape. Patches remained in place for 48 h. Sites evaluated initially at 48 to 72 h, and, again, between 72 and 168 h after initial placement. Positive allergic patch test result was generally interpreted as a 1+, 2+, or 3+ reaction manifested by erythematous papules, vesicles, or spreading reaction with crust and ulceration. Relevance of patch test reactions determined in combination with patient's history and skin examination findings	Of the patients patch-tested, 0.5% had allergic reactions (73.7% relevant reactions, i.e., definite, probable, or possible relevance to patient's present dermatitis).	<sup>117</sup>
Benzophenone-3	3% (in petrolatum)	5800 patients	NACDG study. Patch testing performed from July of 1998 to December of 2000. Patches remained in place for 48 h. Test sites evaluated twice, initially at 48 h to 70 h and, again, at between 72 h and 178 h after initial placement. Positive allergic patch test result was interpreted to be a +, ++, or +++ reaction. Reactions of these types manifested by erythematous papules, vesicles, or a spreading reaction with crust and ulceration.	Incidence of positive reactions was 0.6%. Relevance of this incidence of positive reactions classified as follows: 20.6% (definite relevance), 50% (possible relevance) and 2.9% (past relevance).	<sup>118</sup>

**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-3	3% (in petrolatum)	5085 patients. 589 patients (11.8%) had an occupationally-related skin condition and 3319 (65.3%) had at least 1 allergic patch test reaction.	Standardized patch testing at 13 centers in North America. NACDG patch test results from January of 2007 to December of 2008. Patches (Finn chambers, secured with tape) remained in place for 48 h. Reactions scored at 48 h and 72 h to 168 h. At end of testing, clinical relevance of positive patch test reactions determined by consideration of patient's history and clinical findings. Relevance of a positive allergen categorized	Allergic reactions in 0.9% of the patients. Other values relating to clinical relevance were: definite relevance (22.7%), probable relevance (36.4%), possible relevance (22.7%), and past relevance (6.8%).	<sup>119</sup>
Benzophenone-3	3% aqueous solution	4 patients	Applied, in duplicate, to the midback using Finn chambers. At 48 h post-application, test substance removed, and sites evaluated for reactions. Reactions graded on scale of +1 to +3. Other site containing test substance irradiated with UVA (8 J/cm <sup>2</sup> ), and then covered with light-opaque material. All sites evaluated for reactions at 48 h post-irradiation. Contact allergy diagnosed as equally positive reaction at nonirradiated and irradiated sites. Photoallergy diagnosed as positive irradiated site with negative unirradiated site. Allergy and photoallergy diagnosed when both sites were positive, but with irradiated site having greater reaction than unirradiated site	Results were as follows: +2 reaction (without UVA) and +3 reaction (with UVA) - Patient 1; +2 reaction (without UVA) and +3 reaction (with UVA) - Patient 2; +2 reaction (with UVA) - Patient 3; and +2 reaction (without UVA) and +3 reaction (with UVA). All four patients were photoallergic to Benzophenone-3.	<sup>122</sup>
Benzophenone-3 (in sunscreens)	Concentrations between 1% and 6% (in sunscreen products)	19,570 patients	Data from 64 allergenicity studies (between 1992 and 2006) aggregated and analyzed. Done in order to evaluate the irritation and sensitization potential of sunscreen products.	Forty-eight of 19,570 possible dermal responses considered suggestive of irritation or sensitization. Mean rate of responses across all formulations was 0.26%. Sensitization rates did not correlate with Benzophenone-3 concentration. Available re-challenge data indicated that only 8 of these responses were contact allergies due to Benzophenone-3. Mean rate of contact allergy to Benzophenone-3 was 0.07%. Authors concluded that sunscreen products formulated with 1 to 6% Benzophenone-3 do not possess a significant sensitization or irritation potential for general public.	<sup>119</sup>
Benzophenone-3	3% and 10% (in petrolatum)	23,908 patients. Of these patients patch tested, 219 (0.9%) had sunscreen coded as allergen source	Cross-sectional analysis of patients patch tested by the NACDG between 2001 and 2010 performed	Frequent allergen in sunscreens was Benzophenone-3, whereby 70.2% of the patients (26 of 37 patients patch tested) had an allergic reaction to 10% Benzophenone-3 (in petrolatum) and 64.4% of the patients (56 of 87 patients patch tested) had an allergic reaction to 3% Benzophenone-3 (in petrolatum). Values for clinical relevance of allergic reactions to 10% Benzophenone-3 (in petrolatum) in 26 of 37 patients were: definite relevance (5 of 26 patients (19.2%)), probable relevance (11 of 26 patients (42.3%)), possible relevance (9 of 26 patients (34.6%)), and past relevance (1 of 26 patients (3.8%)). Clinical relevance values reported for 3% Benzophenone-3 (in petrolatum) positive reactions in 56 of 87 patients were: definite relevance (13 of 56 patients (23.2%)), probable relevance (27 of 56 patients (48.2%)), possible relevance (15 of 56 patients (26.8%)), and past relevance (1 of 56 patients (1.8%)).	<sup>120</sup>

**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-3	10% (in white petrolatum)	21 patients	Patients with positive photopatch tests to sunscreen agents retrospectively selected from the database of the contact dermatitis clinic at the Skin and Cancer Foundation in Australia. Test substance applied, in duplicate, using Finn chambers on Scanpor tape. Sites covered with opaque material. After 24 h, the test sites examined and results recorded. One site irradiated with 5 J/cm <sup>2</sup> . Reactions scored on day 5 according to ICDRG standards, and final reading performed on day 7.	Nine patients had positive photopatch test reaction to Benzophenone-3. Two patients had positive reactions at non-irradiated sites.	<sup>124</sup>
Benzophenone-3	10% (in petroleum jelly)	35 patients (11 men, 24 women) with confirmed photosensitivity	Descriptive cross-sectional study (in Argentina) performed to determine proportion of photosensitive patients with photoallergic contact dermatitis to Benzophenone-3. Two sets of patches containing test substance applied to back, 1 on the right and 1 on left. At 48 h after patch application, 1 patch irradiated with cumulative UVA dose (5 J/cm <sup>2</sup> ; peak wavelengths of 350 nm, 365 nm, and 370 nm) over an 18-min period. Reactions scored at 30 min post-irradiation and at 96 h after patch application. Late reading also taken after 1 wk.	Photoallergic contact dermatitis identified in 6 patients (17.14%). Five of these patients (14.28%) had at least 1 positive reaction to Benzophenone-3 in photocontact test. Four patients had reaction at irradiated sites only, and 1 patient had reaction at both irradiated and nonirradiated sites.	<sup>125</sup>
Benzophenones-3 and -4	Benzophenone-3 (10% in petrolatum); Benzophenone-4 (2% in petrolatum)	347 patients (from centers across 12 European countries)	Investigation of photoallergic contact dermatitis frequency performed using 347 patients from centers across 12 European countries. Test substance applied to skin of back, and removed at 48 h. One site irradiated with UVA (5 J/cm <sup>2</sup> ), and other site covered with UV-impermeable material. Reactions scored at 48 h	Benzophenone-3 elicited photoallergic contact dermatitis in 37 patients: + reaction (14 patients), ++ reaction (18 patients), and +++ reaction (5 patients). Benzophenone-4 elicited photoallergic contact dermatitis in 3 patients: + reaction (1 patient) and ++ reaction (2 patients). Allergic contact dermatitis reactions (+ reactions) to Benzophenone-3 observed in 6 patients.	<sup>137</sup>
Benzophenones-3 and -4	Benzophenone-3 (10% in petrolatum); Benzophenone-4 (2% in petrolatum)	1000 patients (consecutive dermatology outpatients in Poland)	Prospective study to evaluate frequency and causes of photoallergic contact dermatitis among dermatology outpatients. In study group, 36 (3.6%; 95% CI: 2.4 - 4.8%) individuals required photopatch testing based on their clinical symptoms. Because total number of patients requiring patch tests of any kind amounted to 205, percentage of photopatch tested patients among all patch-tested patients was 17.5% (95% CI: 12.2 - 22.8%). Patch tests (2 identical sets) mounted on back and remained under occlusion for 48 h. Some sites irradiated with UVA (5 J/cm <sup>2</sup> ) and some non-irradiated. Skin reactions scored 24 h and 48 h after irradiation. Presence of inflammatory reaction at irradiated sites and no reaction to same hapten at non-irradiated sites interpreted as confirmation of photoallergy. In case of positive reactions to a hapten, at both irradiated and non-irradiated sites, the classical contact allergy was recognized.	Photoallergic contact dermatitis ultimately confirmed in 15 (1.5%; 95% CI: 0.7 to 2.3%) patients: 7 females and 8 males. Of these, 2 patients had a positive reaction to Benzophenone-3 (10% in petrolatum). One patient had a positive reaction to Benzophenone-4 (2% in petrolatum).	<sup>139</sup>
Benzophenones-3 and -4	10% (in petrolatum)	402 patients with suspected clinical photosensitivity	Patch and photopatch tests performed according to ICDRG guidelines. UVA dose of 5 or 10 J/cm <sup>2</sup> used for photopatch testing.	3 allergic and 9 photoallergic reactions to Benzophenone-3. No photoallergic or allergic reactions to Benzophenone-4.	<sup>133</sup>



**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenones-3 and -4	Benzophenone-3 (10% in white paraffin); Benzophenone-4 (5% and 10% in white paraffin)	1155 patients (from 17 centers across the United Kingdom, Ireland, and the Netherlands)	Photopatch testing (over 2-year period) of Benzophenone-3 and Benzophenone-4 performed. Photopatch testing involved application of test substance (on aluminum Finn chamber) to skin of mid-upper back (paravertebral area avoided) for 24 h or 48 h (depending on the center). Contact dermatitis units traditionally applied allergens for 48 h, and photobiology units traditionally applied allergens for 24 h. Following patch removal, one set (dark control) covered with light-impermeable occlusive dressing, and the other set irradiated with fluorescent UVA (5 J/cm <sup>2</sup> ). Reactions scored at 48 h post-irradiation, and, if possible, at 24 h and 72 h. ICDRG visual scoring system used.	Benzophenone-3 (10% in white paraffin) caused photoallergic contact reactions in 27 patients. Benzophenone-4 (5% in white paraffin) and Benzophenone-4 (10% in white paraffin) caused photoallergic contact reactions in 2 and 5 patients, respectively. The following allergic reactions also reported: 5% Benzophenone-4 (2 patients), 10% Benzophenone-3 (9 patients), and 10% Benzophenone-4 (9 patients). Photoaugmentation and photoinhibition of contact allergy observed in 1 patient tested with 10% Benzophenone-3 and in 1 patient tested with 10% Benzophenone-4. Irritation reactions observed included: 5% Benzophenone-4 (2 patients), 10% Benzophenone-3 (2 patients), and 10% Benzophenone-4 (4 patients). with 1	<sup>133</sup>
Benzophenones-3 and -4	10% (in petrolatum)	1527 patients	A retrospective analysis involved the reviewing of 1527 charts in the University of British Columbia Contact Dermatitis Clinic patch test database from January of 2009 to July of 2012. 23 of the patients tested with the sunscreen series at the clinic. All 1527 patients patch tested with 70 allergens on NACDG screening series. Patch test chambers containing test substance applied to upper back and secured with tape for 48 h. Reactions scored (using the ICDRG grading scale) at time of patch removal and at 96 h to 120 h.	Of the 23 patients tested, 2 had positive reactions (allergic contact dermatitis) to Benzophenone-3 and 1 had positive reaction to Benzophenone-4. Of the 1527 patients screened 8 reacted to Benzophenone-3 in the NACDG series. This number does not include the 2 patients who tested positive to Benzophenone-3.	<sup>129</sup>
Benzophenones-3 and -4	10% (in petrolatum)	5595 patients tested with Benzophenone-3; 5592 patients tested with Benzophenone-4	NACDG study. Patch testing with Finn chambers.	Of the 5592 patients patch tested with Benzophenone-4, 93 had a positive (allergic) reaction. Values for clinical relevance of allergic reactions were: definite relevance (3 of 93 patients (3.2%)), probable relevance (12 of 93 patients (12.9%)), possible relevance (45 of 93 patients (48.4%)), and past relevance (8 of 93 patients (8.6%)). Of the 5595 patients patch tested with Benzophenone-3, 24 had an allergic reaction. Values for clinical relevance of allergic reactions were: definite relevance (4 of 24 patients (16.7%)), probable relevance (5 of 24 patients (20.8%)), possible relevance (11 of 24 patients (45.8%)), and past relevance (1 of 24 patients (4.2%)).	<sup>130</sup>
Benzophenones-3 (10% in petrolatum) and -4 (2% in petrolatum)		1390 patients tested with Benzophenone-4; 4224 patients tested with Benzophenone-3	British Society for Cutaneous Allergy (BSCA) retrospectively reviewed results from their facial patch test series. Review involved 12 centers in United Kingdom and Ireland for 2-yr period (January of 2016 to December of 2017).	Of the 1390 patients patch tested with Benzophenone-4 (2% in petrolatum), 0.79% (confidence interval (CI): 0.44% to 1.41%) had allergic reactions. Of the 4224 patients patch tested with Benzophenone-3 (10% in petrolatum), 0.17% (CI: 0.08% to 0.35%) had allergic reactions.	<sup>131</sup>
Benzophenones-3 and -4	Not stated	15 patients (4 males, 11 females)	Fifteen patients (4 males, 11 females) had reacted to sunscreens. Of these, 8 had used sunscreens before occasional sun exposure, and 6 had used them regularly for chronic lupus erythematosus, melasma, vitiligo, rosacea, drug photosensitivity, and atopic dermatitis. One patient had reacted to her daily cream containing Benzophenone-3. Patch testing (procedure not stated) performed	Positive patch test results were as follows: 4 allergic contact dermatitis reactions to Benzophenone-4, and 2 allergic contact dermatitis and 5 photoallergic contact dermatitis reactions to Benzophenone-3.	<sup>132</sup>

**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenones-3 and -4	Not stated	12 patients with history of acute eruption on photoexposed areas (induced by ketoprofen or tiaprofenic acid)	At least 1 mo after acute episode of contact dermatitis, patients patch tested using Finn Chamber technique. Finn chambers mounted on Scanpor tape, and patches removed after 2 d. For UV irradiation, 2 sources of light used (UVA alone and UVA + UVB).	Photopatch test results positive for Benzophenone-3 (reactions in 3 of 12 patients) and negative for Benzophenone-4.	<sup>134</sup>
Benzophenones-3 and -4	Not stated	82 patients (with clinical diagnosis of photoallergic contact dermatitis)	Study performed to identify photoallergens that caused photoallergic contact dermatitis in population attending outpatient clinic in Columbia. Test substances applied, in duplicate, to skin on back. Test sites covered with opaque tape for 24 h. Panel on right irradiated with UVA (dose = 5 J/cm <sup>2</sup> ; irradiance = 10.4 mW/cm <sup>2</sup> ). Reactions scored 24 h after application and at 24 h and 72 h post-irradiation.	Both Benzophenone-3 and Benzophenone-4 induced a positive photopatch reaction. Benzophenone-3 photoallergic in 22 of 82 patients (26.8%), and Benzophenone-4 photoallergic in 2 of 82 patients (2.4%).	<sup>136</sup>
Benzophenones-3 and -4	Not stated	160 patients (37 male, 123 female)	Retrospective chart review on patients who underwent photopatch testing in Canada between January of 2001 and December of 2010. Duplicate sets of allergens applied to back. At 24 h, 1 set of allergens uncovered and exposed to UVA at a dose of 5 J/cm <sup>2</sup> . Other set of allergens shielded from UVA exposure. 24-h reactions to non-irradiated compounds assessed at 15 to 20 min later. On following day, irradiated patches read at 24 h post-irradiation. Reactions at non-irradiated patch test sites read 48 h after application.	Benzophenone-3 induced photoallergic reactions in 12 patients, allergic reactions in 17 patients, and both allergic and photoallergic reactions in 6 patients. Benzophenone-4 caused allergic contact dermatitis in 3 patients, but did not cause photoallergic reactions.	<sup>136</sup>
Benzophenones-3 and -4	Not stated	157 children (69 male, 88 female)	Duplicate series of UV filters and children's own sunscreen products applied to back. Reactions scored at time of sample removal and at 24 h and 48 h after exposure to UVA (5 J/cm <sup>2</sup> ).	Ten children (5 to 7%) had positive photopatch reactions to UV filters and/or their sunscreen products (4 to 5% to UV filters; 5 to 7% to their sunscreen products). Benzophenone-3 induced photoallergy (2+ reaction) in 33% of the children (n = 3). Single case of photoaugmentation reaction to Benzophenone-4 reported. Patient had + reaction in control panel, but had ++ reaction in irradiated panel.	<sup>138</sup>
Benzophenones-3,-4, and -10	10%	553 patients	Over a period of 3 yr, patients patch tested (Finn chambers) with each test substance. Results recorded at 48 h (day 2) and 96 h (day 4). Positive reactions (+ to +++) graded according to international recommendations (not specified).	13 patients (8 females, 5 males) and 1 patient with positive reactions to Benzophenone-3 and Benzophenone-10, respectively. 13 patients with positive reactions to Benzophenone-4. 1 patient with positive reaction to both Benzophenone-3 and Benzophenone-4.	<sup>142</sup>
Benzophenones-3, -4, and -10	Not stated	7 patients with ketoprofen-induced photodermatitis	Study performed to evaluate possibility of cross-reactivity between ketoprofen and benzophenones and other chemicals. Patch tests (uninvolved skin of back) performed using Finn chambers. At 24 h post-application, separate series of patch tests exposed to suberythral doses of UVB and UVA. Irradiated and non-irradiated sites evaluated at 72 h post-application.	All non-irradiated patch test results for each test substance were negative. Four and 2 patients had positive UVA photopatch tests to Benzophenone-3 and Benzophenone-10, respectively. Photopatch test results for Benzophenone-4 were negative.	<sup>145</sup>
Benzophenones-3 and -10	Not stated	214 patients (45 with photosensitivity dermatitis/actinic reticuloid syndrome; 54 with polymorphic light eruption)	From 1989 to 1991, patients patch tested with sunscreen series. Standard closed patch testing using Finn Chambers applied to upper back. Patches removed at 2 d, and readings made at time of patch removal and at 3 or 4 d.	16 patients reacted to 1 or more sunscreens. Benzophenone-3 and Benzophenone-10 accounted for 27 and 8 positive patch tests, respectively.	<sup>141</sup>

**Table 12. Retrospective and multicenter studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenones-3 and -10	Not stated	62 patients (32 men and 30 women)	Retrospective analysis of positive photopatch test episodes undertaken using results retrieved from environmental dermatology database, and further verified with original archived patch test documentation for each individual patient. On day 0, standard photoallergens were applied to patient's back in duplicate. On day 2, patches removed, and one series irradiated with 5 J/cm <sup>2</sup> of broadband UVA (2.5 J/cm <sup>2</sup> used if history indicated clear episodes of severe photosensitivity or patient suspected of having chronic actinic dermatitis).	80 photoallergic reactions observed in 62 (2.3%) patients, with UV filters accounting for 52 positive reactions. 34 of the 62 patients (55%) had preceding underlying photodermatosis. Most common UV filter photoallergen was Benzophenone-3 (14 positive results), followed by Benzophenone-10 (9 positive results). Benzophenone-10 accounted for 13 allergic contact reactions, and Benzophenone-3 accounted for eight allergic contact reactions.	<sup>143</sup>
Benzophenones-3 and -10	Not stated	23 patients (with variety of photosensitive disorders)	Study conducted to determine threshold UVA elicitation dose in photopatch testing.	Benzophenone-3 and Benzophenone-10 produced positive responses at 0.7 and 1.07 J/cm <sup>2</sup> , respectively. Isopropyl dibenzoyl dibenzoylmethane produced positive response at 1.0 J/cm <sup>2</sup> . Results demonstrate that high doses of UVA (e.g., 10 to 15 J/cm <sup>2</sup> ) unnecessary, and that 5 J/cm <sup>2</sup> should become current standard.	<sup>144</sup>
Benzophenone-4	2%, 5%, and 10% in petrolatum (20 µl per concentration)	80 subjects	Phototoxicity test. Each test concentration applied to 8-mm diameter Finn chamber, secured with adhesive tape. Patches applied (in duplicate) for 2 d to upper back, i.e., on non-paravertebral skin to the left and right of the upper back. At time of patch removal, one side of back covered with UV-opaque material, while other side irradiated with UV light (5 J/cm <sup>2</sup> ; 99.2% UVA and 0.8% UVB). Reactions scored according to ICDRG grading scale.	One subject had weak positive reaction (+ reaction), with no concomitant erythema score, at irradiated site.	<sup>115</sup>
Benzophenone-4	10% (in petrolatum)	4857 patients	NACDG study. Patch testing performed using Finn chambers	Positive reaction rate of 2.1% (100 allergic reactions). Values for clinical relevance of allergic reactions: definite relevance (0), probable relevance (20 of 100 patients (20%)), possible relevance (53 of 100 patients (53%)), and past relevance (9 of 100 patients (9%)).	<sup>127</sup>
Benzophenone-10	2% (in petrolatum)	280 patients with photosensitivity (and other patients suspected of sunscreen dermatitis)	From February 1985 to March 1987, patients patch and photopatch tested with series of contact allergens and photoallergens. All tests read at 2 d, and, at this time, duplicate light series exposed to UVA (1 J/cm <sup>2</sup> ). Second and final reading of all tests carried out at 4 d.	During first 16 mo of the study period (February 1985 to May 1986), there were 2 patients who were allergic to Benzophenone-10. In remaining 10 mo, 4 patients were allergic to Benzophenone-10. Photopatch results for Benzophenone-10 were negative.	<sup>146</sup>

**Table 13. Case reports**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-2	1% (in petrolatum)	1 female patient	Severe dermatitis observed in a female patient. Dermatitis worsened after sun exposure, and was accompanied by severe itching. Cosmetic contact dermatitis suspected and patch tests (protocol not stated) were performed.	Patch test results for Benzophenone-2 were positive. Reaction classified as +++ (strong reaction: erythema, papules, and vesicles) observed on days 2, 4, and 7.	<sup>149</sup>
Benzophenone-2	2% (in petrolatum)	1 male patient; 15 control subjects	Male patient presented with subacute chest and arm eczema after use of toilet water product. Repeated open application test (ROAT) performed.	ROAT of product elicited positive reaction after 2 applications. Patch testing with ingredient of product, Benzophenone-2, yielded positive reaction (++). No reactions observed in 15 control subjects.	<sup>148</sup>

**Table 13. Case reports**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-2	Concentration not stated	3 patients	Epicutaneous tests performed on two patients (both with itching erythema) who had been using nail varnish and nail varnish remover, and one patient who had artificial nails (itching erythema at perionychium of several fingers; also marked erythema and edema).	The 3 patients had sensitization reactions to important allergens in nail varnish (toluenesulfonamide-formaldehyde resin), nail varnish remover (Benzophenone-2), and artificial nails (ethyl acrylate), respectively. Symptoms and skin changes disappeared when use of 3 items discontinued.	146
Benzophenone-3	2% (in petrolatum)	1 female patient	After sunscreen applied, patient experienced itching and a burning sensation of the nose, cheeks, and dorsa of the hands after 3 h of direct sun exposure. Open photopatch testing (2 cm <sup>2</sup> area on forearm) performed.	Open photopatch testing of sunscreen produced erythematous, papular response 24 h after single exposure to UVA (25 J/cm <sup>2</sup> ), suggesting photoallergy. Patch testing with ingredient of sunscreen, Benzophenone-3, yielded a +++ reaction. Histology of biopsy from Benzophenone-3 photopatch-test reaction showed striking epidermal spongiotic response and vesicle formation, with absence of vacuolation and sunburn cells. Prominent mononuclear inflammatory cell filtrate observed in dermis.	151
Benzophenone-3	3% (in petrolatum)	1 male patient	Patient history: intensely pruritic bilateral lip; perioral, cheek, ear, hand, and forearm dermatitis; and painful ulcerations of the oral mucosa. On examination, 1 to 4 mm papules and papulovesicles (coalescing into edematous plaques) present on dorsal hands, fingers, volar wrists, dorsal forearms, and upper arms. Patch testing performed according to NACDG methods, using Finn chambers secured with tape.	Strong patch test at 48 h (+++ reaction) and 96 h (+++ reaction).	154
Benzophenone-3	10% (in petrolatum)	1 female patient	Patient experienced anaphylactic reaction (generalized wheals) 15 min after applying sunscreen all over her body. Patient previously had pruritus and erythema within 30 min of contact with garment exposed to sunscreen. Patch testing performed. Assay for the detection of IgE to Benzophenone-3 performed by incubating Benzophenone-3 with human serum albumin	Patch testing resulted in urticarial reaction at test site within 20 min, but no anaphylaxis. No specific IgE to Benzophenone-3 detected.	155
Benzophenone-3	Not stated	1 female patient	Erythema and blistering (at application site) observed after a application of ketoprofen gel topically to right popliteal fossa and right shoulder. After intermittent exposure to sunlight (over 24-h period), eruption extended to involve the legs, neck, hands, and other parts of body. Authors noted that, when irradiated with sunlight, ketoprofen is broken down into various benzophenones that are structurally related to Benzophenone-3. Patient patch tested using Finn Chambers on Scanpor tape. Photopatch testing (irradiation with 6 J/cm <sup>2</sup> UVA) also performed	Positive patch and photopatch test reactions to ketoprofen (up to 2% in petrolatum) reported. Negative patch test results for Benzophenone-3; however, positive photopatch test reaction to Benzophenone-3 (+++) reported on day 4.	150
Benzophenone-3	Not stated	1 female patient; 2 control subjects	Patient had history of atopic dermatitis and allergic rhinoconjunctivitis. Anaphylaxis (with generalized cutaneous wheal and flare reaction) observed after widespread application of sunscreen. A few days before testing, patient experienced contact urticaria. Patch testing (blinded and non-blinded, on normal skin) and prick tests performed.	Patch testing with the sunscreen yielded 2-cm diameter wheal and flare reaction within 5 min. Blinded patch testing with Benzophenone-3 (sunscreen ingredient) induced wheal (16 mm) and flare reaction after 15 min. Non-blinded patch tests for Benzophenone-3 in 2 control subjects yielded negative results. In prick tests, results for sunscreen and Benzophenone-3 were positive (wheal, 6 x 7 mm).	152
Benzophenone-3	Not stated	1 female patient; 5 control subjects	Acute, itchy rash observed on face, trunk, and limbs after application of sunscreen to daughter's skin. Patient also subsequently applied 'false tan' product to and developed severe cutaneous and systemic anaphylactic reaction. Patient patch tested with Benzophenone-3 and reactions scored 20 min after patch application.	Acute urticarial wheal and flare (50 mm) reaction observed at 20 min, and reaction settled within 1 h after oral drug treatment. Patch testing of 5 control subjects with Benzophenone-3 did not reveal reactivity at 20 min, 48 h, or 96 h.	153

**Table 13. Case reports**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-3	Not stated	1 female patient	In same report, patient with 1-year history of perioral itching and erythema, and 3-d history of erythematous swelling over face and front of her neck. Patient had been sitting in sun for a few hours, several days before swelling began. Had also used lip balm and shampoo, both of which contained Benzophenone-3. Perioral itching resolved within several days after discontinuing lip balm. Facial erythema improved after shampoo replaced with another that did not contain benzophenone. Patch and photopatch testing performed	1+ reaction to Benzophenone-3 at both patch and photopatch test sites.	<sup>158</sup>
Benzophenones-3 and -4	10% (in petrolatum)	1 female hairdresser	Hand dermatitis observed over 2-year period. When use of hair care products with sun protection ceased, dermatitis began to improve. Patch testing performed	Patch testing with Benzophenone-4 yielded positive (++) reaction. Negative patch test results for Benzophenone-3.	<sup>157</sup>
Benzophenones-3 and -4	Not stated	1 male patient	History of persistent erythema on light-exposed skin after application of sunscreen on several occasions. Photopatch testing with sunscreen ingredients performed. Finn chambers applied to back, followed by UVA irradiation (dose = 10 J/cm <sup>2</sup> ) at 24 h. Reactions scored at 20 min, and 24 h, 48 h, and 72 h post-irradiation	Photopatch test results negative Benzophenone-4. Photopatch test results for Benzophenone-3 were: + (at 24 h), ++ (at 48 h), and +++ (at 72 h).	<sup>155</sup>
Benzophenones-3 and -4	Not stated	1 female patient	Patient with 2- to 3-yr history of intermittent burning and pruritic facial eczema. Erythema of the cheeks bilaterally and on the neck, and minimal scale (but no vesicles) observed. Patient had used facial moisturizer and shampoo, both of which contained Benzophenone-3, for 2 yr. Burning, itching, and erythema resolved when avoided contact with benzophenones in personal care products avoided. Patch testing and photopatch (10 J of UVA exposure) testing performed using Finn chamber technique. Results scored on days 3 and 7	Results significant for 2+ photocontact reaction to Benzophenone-3. No reaction to Benzophenone-3 at non-irradiated site. Immediately after irradiation, urticaria at Benzophenone-3 photopatch test site observed. Reaction consistent with photoallergic contact urticaria. Questionable photocontact reaction to Benzophenone-4.	<sup>158</sup>
Benzophenones-3, -4, and -10	Not stated	1 female patient	Patient presented with eyelid dermatitis for 1 yr and facial dermatitis for 2 mo. Patch tests performed	Patch test results: Benzophenone-3 (++) , Benzophenone-4 (+), and Benzophenone-10 (negative results).	<sup>159</sup>
Benzophenones-3, -8, and -10	Not stated	1 female patient	Patient referred for phototesting and patch testing after recurrent episodes of dermatitis and systemic symptoms. First episode (at 24 h after application of sunscreen) described as follows: edematous, painful pruritic eruption on the arms and neck; voice changes; and tachycardia. NACDG patch and photopatch test panels applied.	At 2 h after patch application and 1 h later, the patient experienced the following: raspy voice, dry mouth, difficulty with swallowing, and tachycardia. Severe urticarial reactions (and systemic symptoms) to Benzophenones-3, -8, and -10 at test sites observed. Because of the severe reactions, UVA irradiation not completed. Authors stated that immediate reactions to and systemic symptoms caused by these benzophenones are rare.	<sup>162</sup>
Benzophenones-3 and -10	Not stated	1 female patient	Face eczema developed after use of cosmetic cream. Patch tests performed using polyethylene chamber secured with tape. Reactions scored on days 2 and 4 according to ICDRG methodology. Photopatch testing also performed, test substances applied in duplicate. Test substances removed after 24 h, and sites irradiated with UVA (5 J/cm <sup>2</sup> ). Reactions scored at day 1 and day 3 post-irradiation	For Benzophenone-3, positive patch test (++) and photopatch test (+++) reactions reported. For Benzophenone-10, patch test results negative, but photopatch test results positive (+++ reaction).	<sup>161</sup>
Benzophenone-4	Not stated	1 patient (diver)	Case of acute facial swelling after ascending to surface of water. Standard patch test for contact dermatitis performed. yielded a positive reaction to Benzophenone-4.	Positive reaction to Benzophenone-4.	<sup>159</sup>

**Table 14.** Other clinical reports

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-3	Not stated	1598 participants	A study was performed to identify association between exposure to potentially endocrine-activating chemicals and age of menarche in adolescent girls. Participants had completed the reproductive health questionnaire and laboratory examination for the Centers for Disease Control and Prevention's National Health and Nutrition Examination Survey (NHANES) for years 2003 to 2008. Exposures were assessed based on creatinine-corrected natural log urine concentrations of selected environmental chemicals and metabolites found in at least 75% of samples in this study sample. The weighted mean age of menarche was 12 yr of age.	Results for Benzophenone-3 indicated that exposure to this chemical was not significantly associated with the age of menarche.	<sup>163</sup>
Benzophenone-3	Not stated	588 participants	Association of Benzophenone-3 with serum total testosterone levels examined using child and adolescent participants in NHANES (2011–2012). Multivariable linear regression performed to estimate associations between natural log-transformed serum testosterone and quartiles of urinary Benzophenone-3 in male and female children and adolescents. Serum testosterone analyzed by isotope dilution LC-MS/MS, and was natural log-transformed for analyses because distribution of this variable was skewed left. Spot urine samples collected from study participants, and Benzophenone-3 measured by solid phase extraction, coupled on-line to HPLC/MS/MS. Statistical tests for linear trends were conducted by modeling quartiles as an ordinal variable using integer values.	Male adolescents in 3 <sup>rd</sup> and 4 <sup>th</sup> quartiles of Benzophenone-3 had statistically significantly lower testosterone than males in lowest quartile. Although the association was strongest for 3 <sup>rd</sup> quartile, overall trend was statistically significant (p-trend = 0.01). In female adolescents, testosterone was statistically significantly higher for girls in second versus first quartile of Benzophenone-3 exposure, but positive associations were closer to the null and nonsignificant for the 3 <sup>rd</sup> and 4 <sup>th</sup> quartiles of exposure (p-trend = 0.14). No significant associations between testosterone and Benzophenone-3 in male or female children, and no evidence of consistent trends with increasing quartiles of exposure. Thus, Benzophenone-3 was associated with statistically significantly lower testosterone in adolescent boys only. Authors concluded that urinary levels of Benzophenone-3 were associated with lower levels of serum testosterone in male adolescents.	<sup>164</sup>
Benzophenone-3	Not stated	200 girls	The influence of Benzophenone-3 and other chemicals on age of menarche was studied.	Log w/v increase in childhood (pre-pubertal) urinary levels of Benzophenone-3 associated with decreased time to menarche. Benzophenone-3 urinary concentrations not reported.	<sup>165</sup>
Benzophenone-3	Not stated	476 mothers (had participated in birth cohort between 2006 and 2008)	Association between maternal urinary phenol concentrations during pregnancy and fetal growth studied	Association between urinary Benzophenone-3 and lower abdominal circumference in males was made. However, authors noted that this association should be verified in larger study populations with planned repeated ultrasound measures during pregnancy.	<sup>166</sup>
Benzophenone-3	Not stated	Cohort of 922 pregnant women	Longitudinal cohort study involving 338 children performed to evaluate association between prenatal exposure to Benzophenone-3 and gestation age and birth weight. Relationships between birth outcomes and urinary concentrations of Benzophenone-3 evaluated. Urinary Benzophenone-3 measured at 3 time points in pregnancy (visit 1: 16 - 20 wk; visit 2: 20 - 24 wk; visit 3: 24 - 28 wk). Multiple linear regression (MLR) models performed to regress gestational age and birthweight z-scores against each woman's log average concentrations of exposure biomarkers. Logistic regression models performed to calculate odds of preterm birth, small or large for gestational age (SGA and LGA), in association with each of the exposure biomarkers. Results transformed into change in the birth outcome for inter-quartile-range difference in biomarker concentration ( $\Delta$ )	Average Benzophenone-3 urinary concentrations associated with an increase in gestational age.	<sup>167</sup>

**Table 14. Other clinical reports**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-3	Not stated	338 children	A longitudinal cohort study for determining an association between urinary phthalates, parabens, and phenols found in personal care products with pubertal timing in girls and boys was performed.	No such association relating to urinary Benzophenone-3 found.	<sup>168</sup>
Benzophenone-3	Not stated	473 mother-son pairs (in cohort)	Placental weights and birth weights were available for cohort whereby Benzophenone-3 was measured in spot urine samples. Urine collected between wk 23 and 29 of gestation.	Positive association between Benzophenone-3 and both placental weight and child birth weight observed.	<sup>168</sup>
Benzophenone-3	Not stated	417 females and 229 males (participants in EARTH study, who gave birth to 418 singleton infants between 2005 and 2018)	Study performed to examine whether maternal and paternal pre-conception urinary concentrations of Benzophenone-3 (e.g., from dietary and personal care product exposure) and other chemicals associated with risk of preterm birth among couples attending fertility care. Mothers and fathers provided average of 4 and 3 urine samples during the preconception period, respectively. Geometric mean of Benzophenone-3 calculated to estimate preconception exposure of each participant. Risk ratios (RRs) of preterm birth (live birth before 37 completed weeks of gestation) estimated using modified Poisson regression models adjusted for covariates. Mean gestational age among singletons was 39.3 (1.7) wk and 8% born preterm.	No consistent pattern of association observed for Benzophenone-3 in either parent.	<sup>170</sup>
Benzophenones-4, and -10	10% (in petrolatum)	15 eczematous dermatitis patients	Photoallergenicity testing performed at least 3 mo after complete disappearance of the dermatitis. In photopatch tests, test substance applied to back, under occlusion, over 2-d period. At 24 h, occlusive patch removed and site exposed to UVA (5 J/cm <sup>2</sup> ). Reactions scored at 48 h and 96 h (day 2 and day 4).	No positive reactions to Benzophenone-4. 3 subjects with positive reactions to Benzophenone-10.	<sup>171</sup>

**Table 15. Epidemiological studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenone-1, -2, -3, and -8	Not stated	413 men	Urine and semen samples (years 2005 to 2009) provided, and relationship between benzophenone urinary concentrations and semen quality studied. Linear mixed models with fixed and random effects used to assess changes in semen endpoints associated with benzophenones quantified in the urine. Investigators estimated change ( $\beta$ -coefficients and accompanying 95% CI) in semen endpoints (e.g., sperm concentration, total sperm count, and sperm motility) for men above the 75 <sup>th</sup> percentile for each benzophenone concentration relative to men below this percentile. Initially, regression models run, including only the benzophenone and creatinine concentrations. Rationale for modeling creatinine continuously was to account for the interindividual variation in concentration, to more closely reflect men's urinary dilution while preserving statistical power	Benzophenone-2 associated with findings such as diminished sperm concentration, more immature sperm, and decreased percentage of other tail abnormalities. Benzophenone-8 associated with decreased hypoosmotic swelling and higher acrosome area. No associations observed for Benzophenone-1 or Benzophenone-3. Overall, authors noted that Benzophenone-2 and Benzophenone-8 associated with changes in semen endpoints, including sperm concentration, sperm viability, motility, sperm head, and morphology. They also noted that whether such changes are sufficient to affect couple fecundity, as measured by the time needed to achieve pregnancy, or other couple-dependent fertility outcomes, remains to be established.	<sup>174</sup>

**Table 15. Epidemiological studies**

Test Article	Concentration/Dose	Test Population	Procedure	Results	Reference
Benzophenones-1, -2, -3, and -8, and 4-hydroxybenzophenone (not a cosmetic ingredient)	Not stated	215 male students	Cross-sectional study performed to examine associations between urinary concentrations of benzophenone-type UV filters and semen quality and reproductive hormone levels. Urine, blood, and semen samples provided on single day. Semen quality evaluated by measuring volume, sperm counts, motility, and morphology. Serum samples analyzed for the following reproductive hormones: FSH, LH, testosterone (T), inhibin B, and E2. Associations between urinary benzophenone concentrations, semen quality parameters, and reproductive hormone levels examined using linear regression, adjusting for potential cofounders	97% of men tested had detectable urinary concentrations of at least 1 of the 5 benzophenone filters quantified. After adjusting for important covariates (i.e., body mass index, smoking status, and time of blood sample collection), the following results were reported: statistically significant positive association between urinary Benzophenone-1 and Benzophenone-3 concentrations and serum FSH levels; urinary Benzophenone-1 concentration statistically significantly positively associated with T/E2; and urinary Benzophenone-1 concentration negatively associated with inhibin B/FSH ratio. Authors concluded that, in young men, urinary benzophenone-type UV filters may be associated with modest alteration of some reproductive hormones, but reported effects on reproductive function are likely to be small, and of unclear clinical significance.	175
Benzophenones-1 and -3	Not stated	300 men	Presence of UV filters in semen, serum, and the urine studied. Samples collected during February to December of 2013, and only 6 of the men had used sunscreen during the 48 h preceding sample collection.	Benzophenone-1 and Benzophenone-3 detected in 19% and 27% of the seminal fluid samples, respectively, albeit at levels of 1 to 2 orders of magnitude lower than were detected in urine. For Benzophenone-1 and Benzophenone-3, levels in the urine and seminal fluid were significantly correlated. Authors concluded that chemical UV filters are present in men's seminal fluid, some of which can activate human sperm-specific CatSper Ca <sup>2+</sup> channel (calcium cation channel of sperm) and thereby potentially interfere with the fertilization process.	62
Benzophenone-3	Not stated	877 idiopathic infertile men and 713 fertile controls	Case-control study on idiopathic male infertility and exposure to phenols in the environment. Urinary concentrations and semen parameters (semen volume, sperm concentration, and sperm number per ejaculate) measured	No evidence of association between exposure to Benzophenone-3 and idiopathic male infertility.	170
Benzophenone-3	Not stated	423 patients	Urinary levels of Benzophenone-3 and the incidence of Hirschsprung's disease investigated in patients in China. Hirschsprung's disease is a neonatal intestinal abnormality that is derived from a failure of enteric neural crest cells migration during embryogenesis from 5 to 12 wk. <sup>52</sup> Patients tested for Benzophenone-3 in urine via spot test, and then divided into groups based on presence of Hirschsprung's disease. Group 1 comprised 101 neonates with Hirschsprung's disease who presented with intestinal obstruction and chronic constipation, and were treated with surgery. Group 2 comprised 103 surgical control infants without Hirschsprung's disease. Third group (Group 3, non-surgical control) consisted of 219 neonates without Hirschsprung's disease.	Results indicated positive association between women identified with medium to high levels of Benzophenone-3 (maximum detection level = 22,800 ppb) in the urine and the incidence of Hirschsprung's disease.	173



## REFERENCES

1. Elder RL. Final report on the safety assessment of Benzophenones-1, -3, -4, -5, -9, and -11. *JACT* 1983;2(5):35-77.
2. Elder RL. Addendum to the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11 to include Benzophenones-2, -6, and -8. *JACT* 1983;2(5):79-84.
3. Andersen FA. Annual review of cosmetic ingredient safety assessments - 2002/2003. Benzophenone-1, -2, -3, -4, -5, -6, -7, -8, -9, -11, and -12. *IJT* 2005;24(1):10-18.
4. Nikitakis, J and Kowcz, A. International Cosmetic Ingredient Dictionary and Handbook Online Version (wINCI). <http://webdictionary.personalcarecouncil.org/jsp/Home.jsp> 2020. Accessed 7/13/2020.
5. European Chemicals Agency (ECHA). 2020. Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) dossier. Benzophenone-12. <https://echa.europa.eu/registration-dossier/-/registered-dossier/13351> Accessed 6-29-2020.
6. European Chemicals Agency (ECHA). 2020. Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) dossier. Benzophenone-1. <https://echa.europa.eu/registration-dossier/-/registered-dossier/12687/1> Accessed 6-23-2020.
7. European Chemicals Agency (ECHA). 2020. Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) dossier. Benzophenone-4. <https://echa.europa.eu/registration-dossier/-/registered-dossier/10063/7/3/2> Accessed 6-24-2020.
8. European Chemicals Agency (ECHA). 2020. Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) dossier. Benzophenone-8. <https://echa.europa.eu/registration-dossier/-/registered-dossier/23375/7/3/2> Accessed 6-25-2020.
9. European Chemicals Agency (ECHA). 2020. Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) dossier. Benzophenone-3. <https://echa.europa.eu/registration-dossier/-/registered-dossier/5515/7/9/3> Accessed 6-24-2020.
10. United States Environmental Protection Agency. 2019. Estimation Programs Interface Suite for Microsoft Windows v 4.11. United States Environmental Protection Agency, Washington, DC, USA.
11. U.S. Food and Drug Administration Center for Food Safety & Applied Nutrition (CFSAN). Voluntary Cosmetic Registration Program - Frequency of use of Cosmetic Ingredients. College Park, MD. 2021. (Obtained under the Freedom of Information Act from CFSAN; requested as "Frequency of Use Data" January 4, 2021; received January 21, 2021.
12. Personal Care Products Council. 2020. Council Concentration of Use by FDA Product Category: Benzophenones (Unpublished data submitted by the Personal Care Products Council on April 14, 2020).
13. Rothe H, Fautz R, Gerber E, et al. Special aspects of cosmetic spray safety evaluations: principles on inhalation risk assessment. *Toxicol Lett* 2011;205(2):97-104.
14. Bremmer HJ, Prud'homme de Lodder LCH, van Engelen JGM. Cosmetics Fact Sheet: To assess the risks for the consumer; Updated version for ConsExpo 4. Bilthoven, Netherlands 2006. RIVM 320104001/2006. <http://www.rivm.nl/bibliotheek/rapporten/320104001.pdf>. Accessed 8/24/2011. Pages 1-77.
15. Rothe H. 2011. Special aspects of cosmetic spray evaluation. Unpublished information presented to the 26 September Expert Panel. Washington D.C.
16. Johnsen MA. The Influence of Particle Size. *Spray Technology and Marketing* 2004;14(11):24-27.
17. Aylott RI, Byrne GA, Middleton J, Roberts ME. Normal use levels of respirable cosmetic talc: preliminary study. *Int J Cosmet Sci* 1979;1(3):177-186.

18. Russell R, Merz R, Sherman W, Sivertson J. The determination of respirable plarticles in talcum powder. *Food Cosmet Toxicol* 1979;17(2):117-122.
19. CIR Science and Support Committee of the Personal Care Products Council (CIR SSC). 11-3-2015. Cosmetic powder exposure. Unpublished data submitted by the Personal Care Products Council.
20. European Commission. CosIng database; following Cosmetic Regulation No. 1223/2009. Last Updated 2020. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R1223-20200501&from=EN> Accessed 9-8-2020.
21. United States Food and Drug Administration (FDA). 2019. Sunscreen drug products for over-the-counter human use. Federal Register 84(38): 6204-6275. <https://www.govinfo.gov/content/pkg/FR-2019-02-26/pdf/2019-03019.pdf> Accessed 7-1-2020.
22. Jiang R, Roberts MS, Collins DM, Benson HA. Absorption of sunscreens across human skin: an evaluation of commercial products for children and adults. *Br J Clin Pharmacol* 1999;48(4):635-637.
23. Benson HAE, Sarveiya V, Risk R, Roberts MS. Influence of anatomical site and topical formulation on skin penetration of sunscreens. *Therapeutics and Clinical Management* 2005;1(3):209-218.
24. Klimova Z, Hojerova J, Berankova M. Skin absorption and human exposure estimation of three widely discussed UV filters in sunscreens - In vitro study mimicking real-life consumer habits. *Food and Chemical Toxicology* 2015;83:237-250.
25. Potard G, Laugel c, Baillet A, Schaefer H, Marty JP. Quantitative HPLC analysis of sunscreens and caffeine during in vitro percutaneous penetration studies. *Int J Pharm* 1999;189(2):246-260.
26. Potard G, Laugel C, Schafer H, Marty JP. The stripping technique: in vitro absorption and penetration of five UV filters on excised fresh human skin *Skin Pharmacol Appl Skin Physiol* 2000;13(6):336-344.
27. Hung C, Fang C, Al-Suwayeh SA, Yang S, Fang J. Evaluation of drug and sunscreen prmeation via skin irradiated with UVB: Comparisons of normal skin and chronologically aged skin. *Journal of Dermatological Science* 2012;68(3):135-148.
28. Fernandez C, Nielloud F, Fortune R, Vian L, Marti-Mestres G. Benzophenone-3: Rapid prediction and evaluation using non-invasive method of in vivo human penetration *J Pharm Biomed Anal* 2002;28(1):57-63.
29. Couteau C, Perez Cullel N, Connan AE, Coiffard LJ. Stripping method to quantify absorption of two sunscreens in human. *Int J Pharm* 2001;222(1):153-157.
30. Le Fol V, Ait-Aissa S, Cabaton N, et al. Cell-specific biotransformation of benzophenone-2 and bisphenol-S in zebrafish and human in vitro models used for toxicity and estrogenicity screening. *Environ Sci Technol* 2015;49(6):3860-3868.
31. Kamikyouden N, Sugihara K, Watanabe Y, et al. 2,5-dihydroxy-4-methoxybenzophenone: a novel major in vitro metabolite of benzophenone-3 formed by rat and human liver microsomes. *Xenobiotica* 2013;43(6):514-519.
32. Watanabe Y, Kojima H, Takeuchi S, et al. Metabolism of UV-filter benzophenone-3 by rat and human liver microsomes and its effect on endocrine-disrupting activity. *Toxicology and Applied Pharmacology* 2015;282(2):119-128.
33. Broniowska Z, Bystrowska B, Starek-Swiechowicz B, et al. Benzophenone-2 concentration and its effect on oxidative stress and apoptosis markers in rat brain. *Neurotox Res* 2019;36(1):39-48.
34. Feduik DJ, Wang T, Raizman JE, Parkinson FE, Gu X. Tissue deposition of the insect repellent DEET and the sunscreen oxybenzone from repeated topical skin applications in rats. *Int J Toxicol* 2010;29(6):594-603.
35. Pomierny B, Krzyzanowska W, Broniowska Z, et al. Benzophenone-3 passes through the blood-brain barrier, increases the level of extracellular glutamate, and induces apoptotic processes in the hippocampus and frontal cortex of rats. *Toxicological Sciences* 2019;171(2):485-500.

36. Skorkowska A, Maciejska A, Pomierny B, et al. Effect of combined prenatal and adult benzophenone-3 dermal exposure on factors regulating neurodegenerative processes, blood hormone levels, and hematological parameters in female rats. *Neurotoxicity Research* 2020;37(3):683-701.
37. Mutlu E, Garner E, Wegerski CJ, et al. Metabolism and disposition of 2-hydroxy-4-methoxybenzophenone, a sunscreen ingredient, in Harlan Sprague Dawley rats and B6C3F1/N mice; a species and route comparison. *Xenobiotica* 2020;50(6):689-704.
38. Schlecht C, Klammer H, Frauendorf H, Wuttke W, Jarry H. Pharmacokinetics and metabolism of benzophenone-2 in the rat. *Toxicology* 2008;245(1-2):11-17.
39. Jeon HK, Sarma SN, Kim YJ, Ryu JC. Toxicokinetics and metabolisms of benzophenone-type UV filters in rats. *Toxicology* 2008;248(2-3):89-95.
40. Nakamura NW, Inselman AL, White GA, et al. Effects of maternal and lactational exposure to 2-hydroxy-4-methoxybenzophenone on development and reproductive organs in male and female offspring. *Birth Defects Res B Dev Reprod Toxicol* 2015;104(1):35-51.
41. Felix T, Hall BJ, Brodbelt JS. Determination of benzophenone-3 metabolites in water and human urine by solid-phase microextraction and quadruple ion trap GC-MS. *Analytica Chimica Acta* 1998;371:195-203.
42. Gonzalez HG, Farbrot A, Larko O. Percutaneous absorption of benzophenone-3, a common component of topical sunscreens. *Clinical and Experimental Dermatology* 2002;27(8):691-694.
43. Janjua NR, Mogensen B, Anderson A-M, et al. Systemic absorption of the sunscreens benzophenone-3, octyl-methoxycinnamate, and 3-(4-methyl-benzylidene) camphor after whole-body topical application and reproductive hormone levels in humans. *J Invest Dermatol* 2004;123(1):57-61.
44. Gonzalez H, Farbrot A, Larko O, Wennberg AM. Percutaneous absorption of the sunscreen benzophenone-3 after repeated whole-body applications, with and without ultraviolet irradiation. *British Journal of Dermatology* 2006;154(2):337-340.
45. Janjua NR, Kongshoj B, Anderson A-M, Wulf HC. Sunscreens in human plasma and urine after repeated whole-body topical application. *JEADV* 2008;22(4):456-461.
46. Tarazona I, Chisvert A, Salvador A. Determination of benzophenone-3 and its main metabolites in human serum by dispersive liquid-liquid microextraction followed by liquid chromatography tandem mass spectrometry. *Talanta* 2013;116:388-395.
47. Yiin L, Tian J, Hung C. Assessment of dermal absorption of DEET-containing insect repellent and oxybenzone-containing sunscreen using human urinary metabolites. *Environ Sci Pollut Res* 2015;22:7062-7070.
48. Matta MK, Zusterzeel R, Pilli NR, et al. Effect of sunscreen application under maximal use conditions on plasma concentration of sunscreen active ingredients. A randomized clinical trial. *JAMA* 2019;321(21):2082-2091.
49. Berger KP, Kogut KR, Bradham A, et al. Personal care product use as a predictor of urinary concentrations of certain phthalates, parabens, and phenols in the HERMOSA study. *J Expo Sci Environ Epidemiol* 2019;29(1):21-32.
50. Matta MK, Florian J, Zusterzeel R, et al. Effect of sunscreen application on plasma concentration of sunscreen active ingredients. A randomized clinical trial. *JAMA* 2020;323(3):256-267.
51. Morrison GC, Beko G, Weschler CJ, et al. Dermal uptake of benzophenone-3 from clothing. *Environ Sci Technol* 2017;51(19):11371-11379.
52. Dinardo JC, Downs CA. Can oxybenzone cause Hirschsprung's disease? *Reprod Toxicol* 2019;86:98-100.
53. Vela-Soria F, Ballesteros O, Zafra-Gomez A, Ballesteros L, Navalon A. UHPLC-MS/MS method for the determination of bisphenol A and its chlorinated derivatives, bisphenol S, parabens, and benzophenones in human urine samples. *Anal Bioanal Chem* 2014;406(15):3773-3785.

54. Moos RK, Angerer J, Wittsiepe J, Wilhelm M, Bruning T, Koch HM. Rapid determination of nine parabens and seven other environmental phenols in urine samples of German children and adults. *Int J Hyg Environ Health* 2014;217(8):845-853.
55. Valle-Sistac J, Molins-Delgado D, Diaz M, Ibanez L, Barcelo D, Silvia Diaz-Cruz M. Determination of parabens and benzophenone-type UV filters in human placenta. First description of the existence of benzyl paraben and benzophenone-4. *Environ Int* 2016;88:243-249.
56. Jimenez-Diaz I, Artacho-Cordon F, Vela-Soria F, et al. Urinary levels of bisphenol A, benzophenones and parabens in Tunisian women: A pilot study. *Sci Total Environ* 2016;562:81-88.
57. Pollack AZ, Perkins NJ, Sjaarda L, et al. Variability and exposure classification of urinary phenol and paraben metabolite concentrations in reproductive-aged women. *Environ Res* 2016;151:513-520.
58. Krause M, Frederiksen H, Sundberg K, et al. Presence of benzophenones commonly used as UV filters and absorbers in paired maternal and fetal samples. *Environ Int* 2018;110:51-60.
59. Kang HS, Ko A, Kwon JE, et al. Urinary benzophenone concentrations and their association with demographic factors in a South Korean population. *Environ Res* 2016;149:1-7.
60. Jimenez-Diaz I, Iribane-Duran LM, Ocon O, et al. Determination of personal care products - benzophenones and parabens - in human menstrual blood. *J Chromatogr B Analyt Technol Biomed Life Sci* 2016;1035:57-66.
61. Kang H, Kim S, Lee G, et al. Urinary metabolites of dibutyl phthalate and benzophenone-3 are potential chemical risk factors of chronic kidney function markers among healthy women. *Environ Int* 2019;124:354-360.
62. Frederiksen H, Krause M, Jorgensen N, Rehfeld A, Skakkebaek NE, Andersson AM. UV filters in matched seminal fluid-, urine-, and serum samples from young men. *J Expo Sci Environ Epidemiol* 2020.
63. Wang L, Kannan K. Characteristic profiles of benzophenone-3 and its derivatives in urine of children and adults from the United States and China. *Environmental Science and Technology* 2013;47(21):12532-12538.
64. Koch HM, Aylward LL, Hays SM, et al. Inter- and intra-individual variation in urinary biomarker concentrations over a 6-day sampling period. Part 2: Personal care product ingredients. *Toxicology Letters* 2014;231(2):261-269.
65. Wang L, Asimakopoulos AG, Kannan K. Accumulation of 19 environmental phenolic and xenobiotic heterocyclic aromatic compounds in human adipose tissue. *Environment International* 2015;78:45-50.
66. van der Meer TM, Artacho-Cordon F, Swaab DF, et al. Distribution of non-persistent endocrine disruptors in two different regions of the human brain. *Int J Environ Res Public Health* 2017;14(9):1059.
67. Molins-Delgado D, Olmo-Campos MD, Valeta-Juan G, Pleguezuelos-Hernandez V, Barcelo D, Diaz-Cruz MS. Determination of UV filters in human breast milk using turbulent flow chromatography and babies' daily intake estimation *Environmental Research* 2018;161:532-539.
68. Barr L, Alamer M, Darbre PD. Measurement of concentrations of four chemical ultraviolet filters in human breast tissue at serial locations across the breast. *J Appl Toxicol* 2018;38:1112-1120.
69. Bora NS, Pathak MP, Mandal S, et al. Safety assessment and toxicological profiling of a novel combinational sunprotective dermal formulation containing melatonin and pumpkin seed oil. *Regul Toxicol Pharmacol* 2017;89:1-12.
70. National Toxicology Program (NTP). 1992. NTP technical report on toxicity studies of 2-hydroxy-4-methoxybenzophenone (CAS No. 131-57-7). NTIS Report No. PB93-126498.
71. Okereke CS, Barat SA, Abdel-Rahman MS. Safety evaluation of benzophenone-3 after dermal administration in rats. *Toxicol Lett* 1995;80(1-3):61-67.
72. National Toxicology Program (NTP). NTP technical report on the toxicology and carcinogenesis studies of 2-hydroxy-4-methoxybenzophenone (CASRN 131-57-7) administered in feed to Sprague Dawley rats and B6C3F1/N mice.

[https://ntp.niehs.nih.gov/ntp/htdocs/lt\\_rpts/tr597\\_508.pdf?utm\\_source=direct&utm\\_medium=prod&utm\\_campaign=ntpgolinks&utm\\_term=tr597.2020](https://ntp.niehs.nih.gov/ntp/htdocs/lt_rpts/tr597_508.pdf?utm_source=direct&utm_medium=prod&utm_campaign=ntpgolinks&utm_term=tr597.2020). Accessed 6-15-2020.

73. Balazs A, Krifaton C, Orosz I, et al. Hormonal activity, cytotoxicity and developmental toxicity of UV filters. *Ecotoxicol Environ Saf* 2016;131:45-53.
74. Santamaria CG, Abud JE, Porporato MM, et al. The UV filter benzophenone-3, alters early follicular assembly in rat whole ovary cultures. *Toxicology Letters* 2019;303:48-54.
75. National Toxicology Program (NTP). 1992. NTP technical report on toxicity studies of 2-hydroxy-4-methoxybenzophenone (CAS No. 131-57-7) administered topically and in dosed feed to F344 rats and B6C3F<sub>1</sub> mice. NIH Publication No. 92-3344.
76. Santamaria CG, Meyer N, Schumacher A, et al. Dermal exposure to the UV filter benzophenone-3 during early pregnancy affects fetal growth and sex ratio of the progeny in mice. *Arch Toxicol* 2020;94:2847-2859.
77. Hsieh MH, Grantham EC, Liu B, Macapagal R, Willingham E, Baskin LS. In utero exposure to benzophenone-2 causes hypospadias through an estrogen receptor dependent mechanism. *The Journal of Urology* 2007;178(45):1637-1642.
78. National Toxicology Program (NTP). 1990. Final report on the reproductive toxicity of 2-hydroxy-4-methoxybenzophenone (CAS No. 131-57-7). NTIS Report Number PB91-158477.
79. Matouskova K, Jerry DJ, Vandenberg LN. Exposure to low doses of oxybenzone during perinatal development alters mammary gland morphology in male and female mice [epub ahead of print]. 2019;S0890-6238(19):30012-30017.
80. Nakamura N, Vijay V, Desai VG, et al. Transcript profiling in the testes and prostates of postnatal day 30 Sprague-Dawley rats exposed perinatally to 2-hydroxy-4-methoxybenzophenone. *Reprod Toxicol* 2018;82:111-123.
81. Amar SK, Goyal S, Dubey D, et al. Benzophenone 1 induced photogenotoxicity and apoptosis via release of cytochrome c and Smac/DIABLO at environmental UV radiation. *Toxicol Lett* 2015;239(3):182-193.
82. Nakajima D, Asada S, Kageyama S, et al. Activity related to the carcinogenicity of plastic additives in the benzophenone group. *J UOEH* 2006;28(2):143-156.
83. Manasfi T, De Meo M, Coulomb B, Di Giorgio C, Ravier S, Boudenne J. Development of transient mutagenic activity following the chlorination of the sunscreen UV filter dioxybenzone (benzophenone-8) in bromide-rich water. *Int J Hyg Environ Health* 2019;222(4):663-669.
84. Santovito A, Ruberto S, Galli G, Menghi C, Girotti M, Cervella P. Induction of chromosomal aberrations and micronuclei by 2-hydroxy-4-methoxybenzophenone (oxybenzone) in human lymphocytes. *Drug Chem Toxicol* 2019;42(4):378-385.
85. Majhi PD, Sharma A, Roberts AL, et al. Effects of benzophenone-3 and propylparaben on estrogen receptor-dependent R-loops and DNA damage in breast epithelial cells and mice *Environmental Health Perspectives* 2020;128(1):17002.
86. United States Environmental Protection Agency (EPA). 1980. Salmonella/Mammalian Microsome plate incorporation assay. EPA/OTS Report Number: 88-920007764.
87. United States Environmental Protection Agency (EPA). 1980. Test for chemical induction of mutation in mammalian cells in culture. The 2,2'-dihydroxy-4-methoxy benzophenone mouse lymphoma assay. EPA/OTS Report Number: OTS 88-920006804.
88. Robison SH, Odio MR, Thompson ED, Aardema MJ, Kraus AL. Assessment of the in vivo genotoxicity of 2-hydroxy-4-methoxy-benzophenone. *Environ Mol Mutagen* 1994;23(4):312-317.
89. In SJ, Kim SH, Go RE, Hwang KA, Choi KC. Benzophenone-1 and nonylphenol stimulated MCF-7 breast cancer growth by regulating cell cycle and metastasis-related genes via an estrogen receptor alpha-dependent pathway. *J Toxicol Environ Health A* 2015;78(8):492-505.

90. Shin S, Go R, Kim C, Hwang K, Nam K, Choi K. Effect of benzophenone-1 and octylphenol on the regulation of epithelial-mesenchymal transition via an estrogen receptor-dependent pathway in estrogen receptor expressing ovarian cancer cells. *Food and Chemical Toxicology* 2016;93(C):58-65.
91. Phiboonchaiyanan PP, Busaron K, Ninsontia C, Chanvorachote P. Benzophenone-3 increases metastasis potential in lung cancer cells via epithelial to mesenchymal transition. *Cell Biol Toxicol* 2017;33(3):251-261.
92. Kariagina A, Morozova E, Hoshyar R, et al. Benzophenone-3 promotion of mammary tumorigenesis is diet-dependent. *Oncotarget* 2020;11:4465-4478.
93. Park MA, Hwang KA, Lee HR, Yi BR, Jeung EB, Choi KC. Benzophenone-1 stimulated the growth of BG-1 ovarian cancer cells by cell cycle regulation via an estrogen receptor alpha-mediated signaling pathway in cellular and xenograft mouse models. *Toxicology* 2013;305:41-48.
94. Kim SH, Hwang KA, Shim SM, Choi KC. Growth and migration of LNCaP prostate cancer cells are promoted by triclosan and benzophenone-1 via an androgen receptor signaling pathway. *Environ Toxicol Pharmacol* 2015;39(2):568-576.
95. Rao GS, Tokunda H, Ichiishi E, et al. Oral chemoprevention of skin cancer in mice by benzophenone sunscreens dioxybenzone and octabenzene in drinking water. *Anticancer Res* 2013;33(6):2535-2540.
96. Garcia-Jimenez A, Teruel-Puche JA, Garcia-Ruiz PA, et al. Action of 2,2',4,4'-tetrahydroxybenzophenone in the biosynthesis pathway of melanin. *International Journal of Biological Macromolecules* 2017;98:622-629.
97. Broniowska Z, Pomierny B, Smaga I, Filip M, Budziszewska B. The effect of UV-filters on the viability of neuroblastoma (SH-SY5Y) cell line. *Neurotoxicology* 2016;54:44-52.
98. Kryzanowska W, Pomierny B, Starek-Swiechowicz B, Broniowska Z, Strach B, Budziszewska B. The effects of benzophenone-3 on apoptosis and the expression of sex hormone receptors in the frontal cortex and hippocampus of rats. *Toxicology Letters* 2018;296:63-72.
99. Wnuk A, Rzemieniec J, Lason W, Krzeptowski W, Kajta M. Apoptosis induced by the UV filter benzophenone-3 in mouse neuronal cells is mediated via attenuation of  $Era/Ppar\gamma$  and stimulation of  $Er\beta/Gpr30$  signaling. *Mol Neurobiol* 2019;55(3):2362-2383.
100. Rachon D, Rimoldi G, Wuttke W. In vitro effects of benzophenone-2 and octyl-methoxycinnamate on the production of interferon- $\gamma$  and interleukin-10 by murine splenocytes. *Immunopharmacology and Immunotoxicology* 2006;28(3):501-510.
101. Broniowska Z, Slusarczyk J, Starek-Swiechowicz B, et al. The effect of dermal benzophenone-2 administration on immune system activity, hypothalamic-pituitary-thyroid axis activity and hematological parameters in male Wistar rats. *Toxicology* 2018;402-403:1-8.
102. Frikeche J, Couteau C, Roussakis C, Coiffard LJM. Research on the immunosuppressive activity of ingredients contained in sunscreens. *Arch Dermatol Res* 2015;307(3):211-218.
103. Lee J, Kim S, Park YJ, Moon HB, Choi K. Thyroid Hormone-Disrupting Potentials of Major Benzophenones in Two Cell Lines (GH3 and FRTL-5) and Embryo-Larval Zebrafish. *Environ Sci Technol* 2018;52(15):8858-8865.
104. Jarry H, Christoffel J, Rimoldi G, Koch L, Wuttke W. Multi-organic endocrine disrupting activity of the UV screen benzophenone 2 (BP2) in ovariectomized adult rats after 5 days of treatment. *Toxicology* 2004;205(1-2):87-93.
105. Schlecht C, Klammer H, Wuttke W, Jarry H. A dose-response study on the estrogenic activity of benzophenone-2 on various endpoints in the serum, pituitary and uterus of female rats. *Arch Toxicol* 2006;80:656-661.
106. Seidlova-Wuttke DS, Jarry H, Wuttke W. Pure estrogenic effect of benzophenone-2 (BP2) but not of bisphenol A (BPA) and dibutylphthalate (DBP) in uterus, vagina and bone. *Toxicology* 2004;205(1-2):103-112.

107. Schmutzler C, Bacinski A, Gotthardt I, et al. The ultraviolet filter benzophenone-2 interferes with the thyroid hormone axis in rats and is a potent in vitro inhibitor of human recombinant thyroid peroxidase. *Endocrinology* 2007;148(6):2835-2844.
108. Janjua NR, Kongshoj B, Petersen JH, Wulf HC. Sunscreens and thyroid function in humans after short-term whole-body topical application: a single-blinded study. *British J Dermatol* 2007;156(5):1080-1082.
109. Gomez E, Pillon A, Fenet H, et al. Estrogenic activity of cosmetic components in reporter cell lines: Parabens, UV screens, and musks. *J Toxicol Environ Health, A* 2005;68(4):239-251.
110. Ziolkowska A, Belloni AS, Nussdorfer GG, Nowak M, Malendowicz LK. Endocrine disruptors and rat adrenocortical function: Studies on freshly dispersed and cultured cells. *International Journal of Molecular Medicine* 2006;18(6):1165-1168.
111. Schlumpf M, Cotton B, Conscience M, Haller V, Steinmann B, Lichtensteiger W. In vitro and in vivo estrogenicity of UV screens. *Environ Health Perspect* 2001;109(3):239-244.
112. Barbosa TC, Dias Nascimento LE, Bani C, et al. Development, cytotoxicity and eye irritation profile of a ndew sunscreen formulation based on benzophenone-3-poly( $\epsilon$ -caprolactone) nanocapsules. *Toxics* 2019;7(51):1-12.
113. Chew S, Deleo VA, Harber LC. An animal model for evaluation of topical photoprotection against ultraviolet A (320-380 nm) radiation. *J Invest Dermatol* 1987;89(4):410-414.
114. Kim H, Lee E, Lee M, et al. Phosphodiesterase 4B plays a role in benzophenone-3-induced phototoxicity in normal human keratinocytes. *Toxicol Appl Pharmacol* 2018;338:174-181.
115. Kerr AC, Niklasson B, Dawe RS, et al. A double-blind, randomized assessment of the irritant potential of sunscreen chemical dilutions used in photopatch testing. *Contact Dermatitis* 2009;60:203-209.
116. . United States Environmental Protection Agency (EPA). 2001. Initial submission: TK 10050 (Chimassorb 81). Contact hypersensitivity in albino guinea pigs. Maximization test. EPA/OTS Report Number: 88010000159.
117. Marks JG, Elsner P, Deleo VA. *Contact & Occupational Dermatology*. 3rd ed. St. Louis: Mosby; 2002.
118. Marks JG, Belsito DV, Deleo VA, et al. North American Contact Dermatitis Group patch-test results, 1998 to 2000. *American Journal of Contact Dermatitis* 2003;14(2):59-62.
119. Agin PP, Ruble K, Hermansky SJ, McCarthy TJ. Rates of allergic sensitization and irritation to oxybenzone-containing sunscreen products: a quantitative meta-analysis of 64 exaggerated use studies. *Photodermatol Photoimmunol Photomed* 2008;24(4):211-217.
120. Warshaw EM, Wang MZ, Maibach HI, et al. Patch test reactions associated with sunscreen products and the importance of testing to an expanded series: Retrospective analysis of North American Contact Dermatitis Group data, 2001 to 2010. *Dermatitis* 2013;24(4):176-182.
121. Fransway AF, Zug KA, Belsito DV, et al. North American Contact Dermatitis Group patch test results for 2007-2008. *Dermatitis* 2013;24(1):10-21.
122. Knobler E, Almeida L, Ruzkowski AM, Held J, Harber L, DeLeo V. Photoallergy to benzophenone. *Arch Dermatol* 1989;125(6):801-804.
123. DeLeo VA, Suarez SM, Maso MU. Photoallergic contact dermatitis. Results of photopatch testing in New York, 1985 to 1990. *Arch Dermatol* 1992;128:1513-1518.
124. Cook N, Freeman S. Report of 19 cases of photoallergic dermatitis to sunscreens seen at the Skin and Cancer Foundation. *Australas J Dermatol* 2001;42(4):257-259.
125. Russo JP, Ipina A, Palazzolo JF, Cannavo AB, Piacentini RD, Niklasson B. Photoallergic contact dermatitis to sunscreens containing oxbenzone in La Plata, Argentina. *Actas Dermosifiliogr* 2018;109(6):521-528.

126. Berne B, Ros AM. 7 years of photopatch testing with sunscreen allergens in Sweden. *Contact Dermatitis* 1998;38(2):61-64.
127. DeKoven JG, Warshaw EM, Belsito DV, et al. North American Contact Dermatitis Group patch test results 2013-2014. *Dermatitis* 2017;28(1):33-46.
128. Shaw T, Simpson B, Wilson B, Oostman H, Rainey D, Storrs F. True photoallergy to sunscreens is rare despite popular belief. *Dermatitis* 2010;21(4):185-198.
129. Beleznavy K, de Gannes G, Kalia S. Analysis of prevalence of allergic contact dermatitis to sunscreen: A cohort study. *Journal of Cutaneous Medicine and Surgery* 2014;18(1):15-19.
130. DeKoven JG, Warshaw EM, Zug KA, et al. North American Contact Dermatitis Group patch test results: 2015-2016. *Dermatitis* 2018;29(6):297-309.
131. Rolls S, Owen E, Bertram CG, et al. What is in? What is out? Updating the British Society for Cutaneous Allergy facial series. *British Journal of Dermatology* 2020(April 13):1-5.
132. Goncalo M, Ruas E, Figueiredo A, Goncalo S. Contact and photocontact sensitivity to sunscreens. *Contact Dermatitis* 1995;33(4):278-280.
133. Schauder S, Ippen H. Contact and photocontact sensitivity to sunscreens. Review of a 15-year experience and of the literature. *Contact Dermatitis* 1997;37(5):221-232.
134. Le Coz CJ, Bottlaender A, Scrivener JN, et al. Photocontact dermatitis from ketoprofen and tiaprofenic acid: cross-reactivity study in 12 consecutive patients. *Contact Dermatitis* 1998;38(5):245-252.
135. Bryden AM, Moseley H, Ibbotson SH, et al. Photopatch testing of 1155 patients: results of the U.K. multicenter photopatch study group. *British Journal of Dermatology* 2006;155(4):737-747.
136. Rodriguez E, Valbena MC, Rey M, de Quijntana LP. Causal agents of hotoallergic contact dermatitis diagnosed in the national institute of dermatology of Colombia. *Photodermatol Photoimmunol Photomed* 2006;22(4):189-192.
137. Kerr AC, Ferguson J, Haylett AK, et al. A European multicenter photopatch test study. *Br J Dermatol* 2012;166(5):1002-1009.
138. Greenspoon J, Ahluwalia R, Juma N, Rosen CF. Allergic and photoallergic contact dermatitis: A 10-year experience. *Dermatitis* 2013;24(1):29-32.
139. Spiewak R. The frequency and causes of photoallergic contact dermatitis among dermatology outpatients. *Acta Dermatovenerol Croat* 2013;21(4):230-235.
140. Haylett AK, Chiang YZ, Nie Z, Ling TC, Rhodes LE. Sunscreen photopatch testing: a series of 157 children. *British J Dermatol* 2014;171(2):370-375.
141. Bilsland D, Ferguson J. Contact allergy to sunscreen chemicals in photosensitivity dermatitis/actinic reticuloid syndrome (PD/AR) and polymorphic light eruption (PLE). *Contact Dermatitis* 1993;29(2):70-73.
142. Hughes TM, Stone NM. Benzophenone 4: an emerging allergen in cosmetics and toiletries. *Contact Dermatitis* 2007;56(3):153-156.
143. Darvay A, White IR, Rycroft RJG, Jones AB, Hawk JLM, McFadden JP. Photoallergic contact dermatitis is uncommon. *British J Dermatol* 2001;145(4):597-601.
144. Duguid C, O'Sullivan D, Murphy GM. Determination of threshold UV-A elicitation dose in photopatch testing. *Contact Dermatitis* 1993;29(4):192-194.
145. Leroy D, Domp martin A, Sczurko C, Michel M, Louvet S. Photodermatitis from ketoprofen with cross-reactivity to fenofibrate and benzophenones. *Photodermatol Photoimmunol Photomed* 1997;13(3):93-97.



146. English JS, White IR, Cronin E. Sensitivity to sunscreens. *Contact Dermatitis* 1987;17(3):159-162.
147. Boehncke WH, Schmitt M, Zollner TM, Hensel O. Nail varnish allergy. An important differential diagnosis in contact dermatitis. *Dtsch Med Wochenschr* 1997;122(27):849-852.
148. Jacobs MC. Contact allergy to benzophenone-2 in toilet water. *Contact Dermatitis* 1998;39(1):42.
149. Gimenez-Arnau A, Gimenez-Arnau E, Sierra-Baldrich E, Lepoittevin J-P, Camarasa JG. Principles and methodology for identification of fragrance allergens in consumer products. *Contact Dermatitis* 2002;47(6):345-352.
150. Horn HM, Humphreys F, Aldridge RD. Contact dermatitis and prolonged photosensitivity induced by ketoprofen and associated with sensitivity to benzophenone-3. *Contact Dermatitis* 1998;38(6):353-354.
151. Collins P, Ferguson J. Photoallergic contact dermatitis to oxybenzone. *British Journal of Dermatology* 1994;131(1):124-129.
152. Emonet S, Pasche-Koo F, Perin-Minisini M-J, Hauser C. Anaphylaxis to oxybenzone, a frequent constituent of sunscreens. *Journal of Allergy and Clinical Immunology* 2001;107(3):556-557.
153. Yesudian PD, King CM. Severe contact urticaria and anaphylaxis from benzophenone-3 (2-hydroxy 4-methoxy benzophenone). *Contact Dermatitis* 2002;46(1):55-56.
154. Schram SE, Glesne LA, Warshaw EM. Allergic contact cheilitis from benzophenone-3 in lip balm and fragrance/flavorings. *Dermatitis* 2007;18(4):221-224.
155. Spijker GT, Schuttelaar MA, Barkema L, Velders A, Coenraads P. Anaphylaxis caused by topical application of a sunscreen containing benzophenone-3. *Contact Dermatitis* 2008;59(4):248-249.
156. Schmidt T, Ring J, Abeck D. Photoallergic contact dermatitis due to combined UVB (4-methylbenzylidene camphor/octyl methoxycinnamate) and UVA (benzophenone-3/butyl methoxydibenzoylmethane) absorber sensitization. *Dermatology* 1998;196(3):354-357.
157. Alanko K, Jolanki R, Estlander T, Kanerva L. Occupational allergic contact dermatitis from benzophenone-4 in hair-care products. *Contact Dermatitis* 2001;44(3):188.
158. Nedorost ST. Facial erythema as a result of benzophenone allergy. *J Am Acad Dermatol* 2003;49(5):S259-S261.
159. Buzzacott P, Dolen WK, Chimiak J. Case report: acute facial swelling in a recreational technical diver. *Physiol Rep* 2017;5(7):e13240.
160. Guin JD. Eyelid dermatitis from benzophenone used in nail enhancement. *Contact Dermatitis* 2000;43(5):308-309.
161. Kiec-Swiercznska M, Krecisz B, Swierczynska-Machura D. Photoallergic and allergic reaction to 2-hydroxy-4-methoxybenzophenone (sunscreens) and allergy to cetyl alcohol in cosmetic cream. *Contact Dermatitis* 2005;53(3):170-171.
162. Tawfik ME, Atwater AR. Anaphylactoid reaction to benzophenones, with recurrence during patch testing. *Contact Dermatitis* 2019;81(4):303-304.
163. Buttke DE, Sircar K, Martin C. Exposures to endocrine-disrupting chemicals and age of menarche in adolescent girls in NHANES (2003-2008). *Environ Health Perspect* 2012;120(11):1613-1618.
164. Scinicariello F, Buser MC. Serum testosterone concentrations and urinary bisphenol A, benzophenone-3, triclosan, and paraben levels in male and female children and adolescents: NHANES 2011-2012 *Environmental Health Perspectives* 2016;124(12):1898-1904.
165. Binder AM, Corvalan C, Calafat AM, et al. Childhood and adolescent phenol and phthalate exposure and the age of menarche in Latina girls. *Environ Health* 2018;17(1):17-32.

166. Ferguson KK, Meeker JD, Cantonwine DE, et al. Environmental phenol associations with ultrasound and delivery measures of fetal growth. *Environ Int* 2018;112:243-250.
167. Aker A, Ferguson KK, Rosario ZY, et al. The associations between prenatal exposure to triclocarban, phenols and parabens with gestational age and birth weight in Northern Puerto Rico. *Environ Res* 2019;169:41-51.
168. Harley KG, Berger KP, Kogut K, et al. Association of phthalates, parabens and phenols found in personal care products with pubertal timing in girls and boys. *Human Reproduction* 2019;34(1):109-117.
169. Philippat C, Heude B, Botton J, Alfaidy N, Calafat AM, Slama R. Prenatal exposure to select phthalates and phenols and associations with fetal and placental weight among male births in the EDEN cohort (France). *Environmental Health Perspectives* 2019;127(1):17002.
170. Mustieles V, Zhang Y, Yland J, et al. Maternal and paternal preconception exposure to phenols and preterm birth. *Environment International* 2020;137:105523.
171. Foti C, Bonamonte D, Conserva A, et al. Allergic and photoallergic contact dermatitis from ketoprofen: evaluation of cross-reactivities by a combination of photopatch testing and computerized conformational analysis. *Curr Pharm Des* 2008;14(27):2833-2839.
172. Chen M, Tang R, Fu G, et al. Association of exposure to phenols and idiopathic male infertility. *J Hazard Mater* 2013;250-251:115-121.
173. Huo W, Cai P, Chen M, et al. Relationship between prenatal exposure to BP-3 and Hirschsprung's disease. *Chemosphere* 2016;144:1091-1097.
174. Louis GMB, Chen Z, Kim S, Sapra KJ, Bae J, Kannan K. Urinary concentrations of benzophenone-type ultraviolet light filters and semen quality. *Fertil Steril* 2015;104(4):989-996.
175. Adoamnei E, Mendiola J, Monino-Garcia M, et al. Urinary concentrations of benzophenone-type ultra violet light filters and reproductive parameters in young men. *International Journal of Hygiene and Environmental Health* 2018;221(3):531-540.
176. Hojerova J, Perackova Z, Berankova M. Margin of safety for two filters estimated by in vitro permeation studies mimicking consumer bias: Effects of skin shaving and sunscreen reapplication. *Food and Chemical Toxicology* 2017;103:66-78.
177. Scientific Committee on Consumer Products (SCCP). 2008. Opinion on Benzophenone-3. [https://ec.europa.eu/health/ph\\_risk/committees/04\\_sccp/docs/sccp\\_o\\_159.pdf](https://ec.europa.eu/health/ph_risk/committees/04_sccp/docs/sccp_o_159.pdf) Accessed 7-1-2020.

## 2

# Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11

Benzophenones-1 to -12 are substituted derivatives of 2-hydroxybenzophenone. They are used as photostabilizers in cosmetics and have a photoprotective effect on the skin.

When ingested and absorbed, Benzophenones were primarily conjugated and excreted in the urine. Benzophenones were practically nontoxic when chronically administered orally to rats, and Benzophenones-3 and -4 were nontoxic when applied to the skin of rabbits at doses of > 5 g/kg. Subchronic oral ingestion of Benzophenone-3 at 1% was nontoxic to rats; however, another study showed Benzophenone-3 at 0.5% was toxic. Benzophenone-1 elicited toxic effects in rats at 0.6 g/kg.

Benzophenones were nonirritating or mildly irritating to rabbit skin at concentrations of up to 100% and practically nonirritating to the eyes of rabbits. A subchronic skin irritation test indicated that Benzophenone-4 was capable of causing minimal irritation in rabbits at a concentration of 10%. Benzophenone-3 was reported to be nonsensitizing and nonphototoxic in guinea pigs and rabbits.

Benzophenones-1, -3, -4, -5, and -9 were nonmutagenic both with and without metabolic activation in the Ames test.

Skin irritation and sensitization in humans indicated that Benzophenones were mildly irritating and sensitizing at concentrations greater than those used in cosmetics.

On the basis of the available animal data and clinical human experience, it is concluded that Benzophenone-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics.

## INTRODUCTION

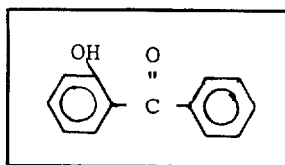
This document reviews the published and unpublished information on Benzophenones-1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, and -12. On the basis of

the information within this report, a safety assessment has been made concerning Benzophenones-1, -3, -4, -5, -9, and -11. Relevant chemical, use, toxicological, and clinical data on the other Benzophenones have been included. Benzophenones-7, -10, and -12 are not used in cosmetics; therefore, a safety recommendation is not included on these three ingredients. A separate determination of safety was made for Benzophenones-2, -6, and -8.

## CHEMISTRY

### General Structure

Benzophenones-1 to -12 are substituted derivatives of 2-hydroxybenzophenone, which conforms to the structure:



Substituents include hydroxy, methoxy, octyloxy, sulfonyl, methyl, and chloride groups. Benzophenones\* may be mono-, di-, tri-, or tetra-substituted.

Among the many preparative methods for individual Benzophenones, the most common is the Friedel-Crafts reaction.<sup>(1-4)</sup>

Benzophenones-3, -6, and -8 are components of and can be extracted from certain flower pigments.<sup>(5)</sup>

### General Properties

The most important property of the Benzophenones is their ability to absorb and dissipate ultraviolet (UV) radiation. When UV light passes through a Benzophenone solution, certain frequencies or wavelengths are selectively absorbed. Electromagnetic energy is transferred to the Benzophenone molecule; as a result, outer electrons are promoted from their lowest-energy ground state to higher-energy excited states. Since only certain states are possible in any given molecule, and since the energy difference between any ground state and excited state must equal the energy added by the quantum, only certain frequencies of radiation can be absorbed by a particular Benzophenone. Excited molecules are relatively short-lived and tend to return to their ground states after approximately

---

\*Throughout this report the term "Benzophenone(s)" is used although all compounds reviewed are 2-hydroxybenzophenones.

$10^{-8}$  seconds. Under usual circumstances, the excited molecule loses its energy and returns to the ground state through a series of collisions with other molecules in the system; the net effect of this process is that the absorbed energy is converted to heat. If an excited molecule is slow to lose its excess energy through collision, it may return to the ground state by emitting radiation of lower frequency than the absorbed radiation. The net effect of this process is fluorescence. Benzophenones are used to protect photodegradable compounds. The Benzophenones form intermolecular hydrogen bonds with the photodegradable molecules; these bonds serve as bridges to transfer energy from the electronically excited, vulnerable molecules to the Benzophenone molecule.<sup>(6-8)</sup>

In a study that determined the effect of substituent addition and substitution on the photostabilizing property of Benzophenones, alkylation of the hydroxyl group at the para position reduced the photostabilizing potential of the molecule. Addition of a methoxy group to the second benzene nucleus also reduced the molecule's photoprotecting effect.<sup>(9)</sup>

Most Benzophenones are solid at room temperature, soluble in organic solvents, and insoluble in water.

### General Reactions

Owing to the variety of substituents in these ingredients, many Benzophenone derivatives can be prepared. Benzophenones can undergo etherification and reactions typical of ketones. Via the Grignard reaction, alcohols can be prepared from Benzophenones.<sup>(10)</sup> Benzophenones can take part in photopinacolization reactions in which a reduction of two ketones produces a bond between the carbons.<sup>(11)</sup> Benzophenones are reduced by sodium hydroborates.<sup>(12)</sup>

Although Benzophenones are frequently incorporated into plastics and films, normally they do not react with the polymer itself. However, Kamogawa<sup>(13)</sup> described an acid-catalyzed reaction between N-(hydroxymethyl)-acrylamide and Benzophenones. The resulting product was a polymeric phenolic UV absorber.

### General Analysis

Thin-layer chromatography and gas chromatography are frequently employed to determine the Benzophenone content in plastics, polymers, and films.<sup>(14-21)</sup> Spectroscopic methods including mass spectroscopy, spectrofluorometry, phosphorimetry, nuclear magnetic resonance (NMR), and infrared (IR) spectroscopy are also used to identify Benzophenones.<sup>(22-27)</sup>

Since 1978, reverse phase high performance liquid chromatography (HPLC) has been recommended for the analysis of Benzophenones. In the case of the Benzophenone sulfonic acids (Benzophenone-4, -5, and -9), a  $\mu$  Bondapak CN column and water-methanol (95:5) mobile phase are used; in the case of the other Benzophenones, a  $\mu$  Bondapak C<sub>18</sub> column and a water-methanol (40:60) plus 1 to 2 volumes acetic acid mobile phase are used.<sup>(28)</sup>

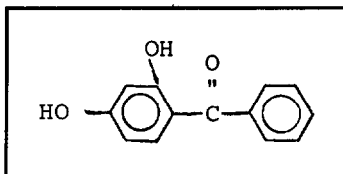
Infrared spectra for the individual Benzophenones have been reported by CTFA.<sup>(29)</sup>

## Individual Benzophenone Ingredients

### Benzophenone-1

#### Structure

Benzophenone-1 is a dihydroxy Benzophenone conforming to the structure:<sup>(3)</sup>



Other names include:

- 2,4-Dihydroxybenzophenone
- Benzo-resorcinol
- 4-Benzoyl Resorcinol
- (2,4-Dihydroxyphenyl) phenylmethanone
- Resbenzophenone

Three methods of Benzophenone-1 preparation from resorcinol are reported. Stephen<sup>(30)</sup> and Zilberman and Rybakova<sup>(31)</sup> prepared Benzophenone-1 from the Hoesch reaction of resorcinol and either a substituted imido chloride (to form an imido-ester intermediate) or a corresponding aromatic nitrile and a metal halide catalyst. Shaw and Mehta<sup>(32)</sup> described the condensation of benzamide with resorcinol in the presence of phosphorous oxychloride and zinc chloride to Benzophenone-1. Additionally, Benzophenone-1 can be prepared in low yield by the Fries rearrangement from phenyl-2-methoxy-benzoate.<sup>(1)</sup>

#### Properties

Benzophenone-1 (MW 214.21) is a light-yellow powder with a melting point of 144°C. It is soluble in methanol, ethanol, ethyl acetate, methyl ethyl ketone, acetone, ether, and acetic acid; slightly soluble in benzene; and insoluble in water.<sup>(3,29)</sup> Tables 1 and 2 describe other physical and chemical data for this compound.

#### Reactivity

Benzophenone-1 reacts with a variety of organic and inorganic compounds. Head<sup>(33)</sup> reported an etherification of the 4-hydroxy group of Benzophenone-1 to 4-(β-aryloxymethyl), 4-(β-arylethoxymethyl), and 4-[β-(aryloxymethoxy)ethyl] derivatives. In the presence of bromide, phenyl nitrate, or nitric acid, Benzophenone-1 can react to form a number of bromo- and nitrobenzenes.<sup>(34)</sup> Benzophenone-1 and methyl acrylate can combine to form a product that can polymerize with other compounds to form a photostable polymer.<sup>(35)</sup> Benzophenone-1 is highly reactive with diphenylpicrylhydrazyl.<sup>(36)</sup>

TABLE 1. Chemical and Physical Properties.<sup>a</sup>

Ingredient	Specific gravity (at 25°C)	pH (10%/25°C)	Moisture (% max.)	Impurities (ppm max.)	
				Pb	As
Benzophenone-1	1.2743	2.0-3.0	2	18	1
Benzophenone-2	— <sup>b</sup>	4.0	5.0	8	1
Benzophenone-3	—	—	2	13	1
Benzophenone-4	—	2.0 (1%)	10-16 (trihydrate)	18	1
Benzophenone-6	1.3448	4.0-5.0	0.5	13	1
Benzophenone-8	—	—	2	—	—
Benzophenone-9	—	6.8-7.2	5.0	8	1
Benzophenone-11	1.3843	3.0-4.0	5.0	13	1

<sup>a</sup>Data from Refs. 3, 6, and 29.<sup>b</sup>No data available.

### Impurities

The maximum recommended levels of arsenic and lead in Benzophenone-1 are reported in Table 1.<sup>(3)</sup>

### Benzophenone-2

#### Structure

Benzophenone-2 is a tetrahydroxy-substituted derivative of Benzophenone conforming to the structure:<sup>(3)</sup>

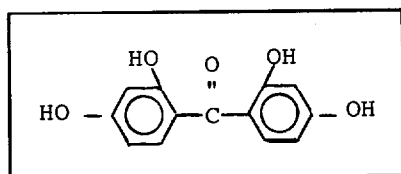


TABLE 2. UV Absorption Spectra Data for Benzophenones.

Benzophenone	$\lambda$ max (nm)	log $\epsilon$	$\lambda$ max (nm)	log $\epsilon$	$\lambda$ max (nm)	log $\epsilon$	Ref.
-1	242	3.94	290	3.96	338	4.12	37
-2	242	3.80	283	3.96	352	4.17	37
-3	—	—	289	4.13	322	3.96	37
-4	242	4.11 <sup>a</sup>	288	4.14 <sup>a</sup>	333	3.92 <sup>a</sup>	38
-6	—	—	281	4.11	339	4.12	3,29
-8	242	4.18 <sup>b</sup>	285	4.31 <sup>b</sup>	330	4.18 <sup>b</sup>	38
-9	—	—	284	3.85	333	—	3,29
-10	250	3.89	300	4.27	—	—	37
-11	—	—	285	4.10	341	4.12 <sup>c</sup>	3,29

<sup>a</sup>Assuming cell path length = 1 cm.<sup>b</sup>Assuming cell path length = 10 cm.<sup>c</sup>Assuming average molecular wt. of BP-11 is approx. that of BP-6.

Other names include:

2,2', 4, 4'-Tetrahydroxybenzophenone

Benzophenone-2 is prepared either by the reaction of hydroxybenzenes with benzyl hydroxide in the presence of a metal halide catalyst, or by the condensation of resorcinol with 2,4-dihydroxybenzoic acid in the presence of  $\text{POCl}_3$  and  $\text{ZnCl}_2$ .<sup>(2,3,39,40)</sup>

#### *Properties*

Benzophenone-2 (MW 302.33) is a yellow crystalline solid with a melting point of 195°C. It is soluble in methanol, ethanol, methyl ethyl ketone, and only slightly soluble in water and toluene.<sup>(29,41)</sup> Tables 1 and 2 list other physico-chemical data of Benzophenone-2.

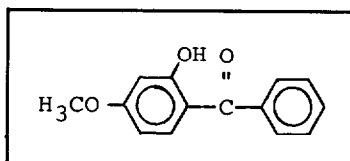
#### *Impurities*

The maximum recommended levels of lead and arsenic in Benzophenone-2 are listed in Table 1.<sup>(3)</sup>

### **Benzophenone-3**

#### *Structure*

Benzophenone-3 is a monomethoxylated derivative of the parent compound, and it conforms to the structure:<sup>(3)</sup>



Other names include:

2-Hydroxy-4-methoxybenzophenone  
Oxybenzone

Benzophenone-3 is prepared by the Friedel-Crafts reaction of benzoyl chloride with 3-hydroxyanisole. The product is then recrystallized from water/methanol and dried.<sup>(3)</sup>

#### *Properties*

Benzophenone-3 (MW 228.26) is a light cream-colored powder that melts at 66°C and has low volatility. It is soluble in most organic solvents and insoluble in water.<sup>(3,42)</sup> Tables 1 and 2 list other physical and chemical data for this compound.<sup>(3,6)</sup>

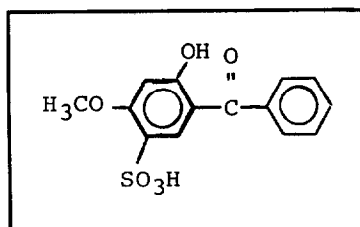
#### *Impurities*

The maximum recommended levels of lead and arsenic impurities in Benzophenone-3 are listed in Table 1.<sup>(3)</sup>



**ASSESSMENT: BENZOPHENONES-1, -3, -4, -5, -9, and -11****Benzophenone-4***Structure*

Benzophenone-4 is a sulfonic acid derivative of Benzophenone-3. It conforms to the structure:<sup>(3)</sup>



Other names include:

2-Hydroxy-4-Methoxybenzophenone-5-Sulfonic Acid  
Sulisobenzone

Benzophenone-4 is prepared via sulfonation of Benzophenone-3. The product is purified by precipitation from aqueous HCl, isolated by centrifugation, washed with acidic water, and dried.<sup>(3)</sup>

*Properties*

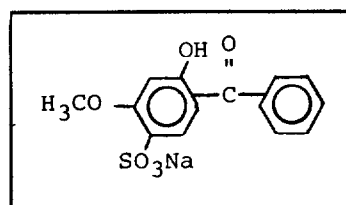
Benzophenone-4 (MW 318.39) is a pale ivory-colored powder that is soluble in water (33.4 g/100 ml H<sub>2</sub>O), methanol, and ethanol.<sup>(43)</sup> It has a melting point of 147°C.<sup>(44,45)</sup> Tables 1 and 2 list other data for Benzophenone-4.<sup>(3,6)</sup>

*Impurities*

The maximum recommended levels of lead and arsenic impurities in Benzophenone-4 are reported in Table 1.<sup>(3)</sup>

**Benzophenone-5***Structure*

Benzophenone-5 is the sodium salt of Benzophenone-4. It conforms to the structure:<sup>(3)</sup>



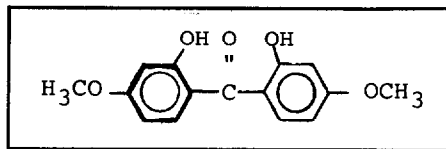
Other names include:

2-Hydroxy-4-Methoxybenzophenone-5-Sodium Sulfonate

No data on properties, reactivity, or impurities of Benzophenone-5 were available.

**Benzophenone-6***Structure*

Benzophenone-6 is a tetra-substituted Benzophenone conforming to the structure:<sup>(3)</sup>



Other names include:

2,2'-Dihydroxy-4,4'-Dimethoxybenzophenone  
Bis (2-Hydroxy-4-Methoxyphenyl)-Methanone

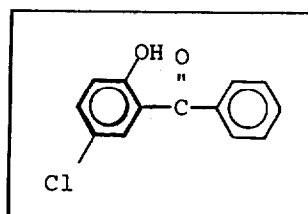
For the synthesis of Benzophenone-6, 1,3-dimethoxybenzene is reacted with oxalyl chloride. The resulting 2,2',4,4'-tetramethoxy-benzophenone is demethylated to Benzophenone-6 with  $\text{AlCl}_3$ .<sup>(46)</sup> The same compound is also formed by the condensation of 3-methoxyphenol with 2-hydroxy-4-methoxybenzoic acid in the presence of phosphorous oxychloride and zinc chloride.<sup>(2)</sup> A proprietary method has been reported in which the Friedel-Crafts reaction is used.<sup>(3)</sup>

*Properties*

Benzophenone-6 (MW 274.26) is a light yellow solid with a melting point of  $124^\circ\text{C}$ . It is soluble in methanol, ethanol, ethyl acetate, methyl ethyl ketone, and toluene, but is insoluble in water.<sup>(3,29)</sup> Tables 1 and 2 contain additional information regarding Benzophenone-6.

**Benzophenone-7***Structure*

Benzophenone-7 is a chlorinated derivative of hydroxybenzophenone. It conforms to the structure:<sup>(3)</sup>



Other names include:

5-Chloro-2-Hydroxybenzophenone  
2-Hydroxy-5-Chlorobenzophenone

Benzophenone-7 is prepared via the Friedel-Crafts reaction of chloromethoxybenzene with benzoyl chloride in the presence of aluminum chloride.<sup>(4)</sup>

*Reactivity*

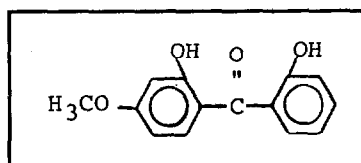
Benzophenone-7 reacts with phosphorous pentachloride to give 4-chloro-2-

( $C_6H_5CCl_2$ )- $C_6H_5OPOCl_2$ . It will also combine with salicylaldehyde and cobalt to form a series of cobalt (II) complexes of cyclic ligands.<sup>(47,48)</sup> Benzophenone-7 is reactive in the presence of diphenylpicrylhydrazyl.<sup>(36)</sup>

### Benzophenone-8

#### Structure

Benzophenone-8 is the 2'-hydroxy derivative of Benzophenone-3, and it conforms to the structure:<sup>(3)</sup>



Other names include:

2,2'-Dihydroxy-4-Methoxybenzophenone

Dioxybenzone

No information regarding the manufacturing process of Benzophenone-8 was available.

#### Properties

Benzophenone-8 (MW 244.24) is a yellow crystalline solid. A product of 93% purity had a melting range of 73.5°–74.5°C and a boiling point at 1 mm Hg of 164°–166°C.<sup>(49)</sup> It is soluble in methanol, ethanol, ethyl acetate, isopropanol, ether, and acetone, and slightly soluble in water. Benzophenone-8 is stable to moisture at temperatures up to 200°C.<sup>(3,29,41,50)</sup> Tables 1 and 2 list other physical and chemical data for this compound.<sup>(3,6)</sup>

#### Reactivity

Ismail<sup>(51)</sup> reported that Benzophenone-8 reacts with organometallic compounds to give preparations which, when used in polyvinyl chloride, stabilize this polymer against ultraviolet radiation damage.

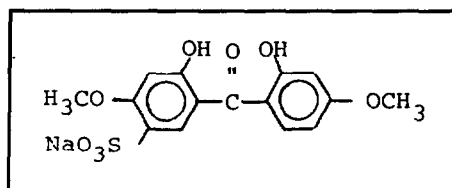
#### Impurities

The starting materials used or the by-products formed in the preparation of Benzophenone-8 may be present at a total concentration of up to 7% in the final product. These materials include: resorcinol dimethyl ether, resorcinol monomethyl ether, trihydroxybenzophenone, xanthone, free sulfur, or sulfur compounds.<sup>(52)</sup>

### Benzophenone-9

#### Structure

Benzophenone-9 conforms to the structure:<sup>(3)</sup>



Other names include:

Sodium 2,2'-Dihydroxy-4,4'-Dimethoxy-5-Sulfobenzophenone

Benzophenone-9 is prepared by the sulfonation of Benzophenone-6.<sup>(3)</sup>

#### *Properties*

Benzophenone-9 is a light yellow powder with a melting point of 350°C. It is soluble in water and slightly soluble in methanol and ethanol, and insoluble in ethyl acetate and benzene. Benzophenone-9 is diluted with sodium sulfate to 67% when supplied from the manufacturer.<sup>(3,29)</sup> Tables 1 and 2 list other physicochemical data for this compound.

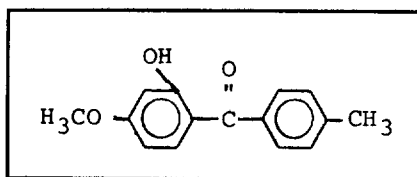
#### *Impurities*

The maximum recommended levels of lead and arsenic impurities in Benzophenone-9 are reported in Table 1.<sup>(3)</sup>

### **Benzophenone-10**

#### *Structure*

Benzophenone-10 is a 4'-methyl derivative of Benzophenone-3. It conforms to the structure:<sup>(3)</sup>



Other names for Benzophenone-10 include:

2-Hydroxy-4-Methoxy-4'-Methylbenzophenone

Mexenone

No other chemical data regarding Benzophenone-10 were available.

### **Benzophenone-11**

#### *Structure*

Benzophenone-11 is a mixture of 2,2'-Dihydroxy-4,4'-dimethoxybenzophenone (Benzophenone-6) and other tetra-substituted benzophenones.<sup>(3)</sup> Benzophenone-11 is manufactured by a proprietary Friedel-Crafts reaction.<sup>(3)</sup>

#### *Properties*

Benzophenone-11 is a yellow or tan powder that has a melting range of 85°–105°C.<sup>(3)</sup> It is soluble in methanol, ethanol, ethyl acetate, and methyl ethyl ketone, and insoluble in water.<sup>(45)</sup> Other properties of Benzophenone-11 are listed in Tables 1 and 2.<sup>(3,6)</sup>

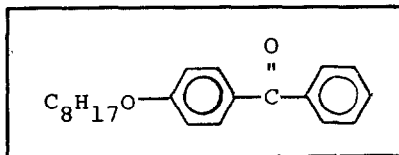
#### *Impurities*

The maximum recommended levels of lead and arsenic impurities in Benzophenone-11 are reported in Table 1.<sup>(3)</sup>

## Benzophenone-12

### Structure

Benzophenone-12 conforms to the structure:<sup>(3)</sup>



Other names include:

2-Hydroxy-4-(octyloxy)benzophenone  
 2-Hydroxy-4-(octyloxy)phenyl phenylmethanone  
 Octabenzone

### Properties

Benzophenone-12 (MW 326.42) has a melting point of 46°C.<sup>(3)</sup> In a study of the volatility at 200°C of various antioxidants used in polymers, this ingredient was one of the least volatile.<sup>(53)</sup>

## USE

### Cosmetic

Benzophenones are used in cosmetics as ultraviolet light absorbers (photostabilizers). Each Benzophenone has its own characteristic absorption spectrum (Table 2). Benzophenones-2, -3, -4, -6, -8, and -9 are used in suntan lotions and hair sprays because they protect the skin and hair from the harmful effects of the sun.<sup>(54-63)</sup> These ingredients also photostabilize cosmetic dyes, creams, and lotions.<sup>(61,64-66)</sup> Although most Benzophenones are water insoluble, the presence of the sulfonic acid group in Benzophenones-4, -5, and -9 makes these ingredients soluble in water.<sup>(3)</sup>

According to the industry's voluntary submission to the Food and Drug Administration (FDA) in 1976, Benzophenones are used in over a thousand cosmetic formulations, typically in concentrations up to 1%. Benzophenones are supplied undiluted from the manufacturer, with the exceptions of Benzophenone-9, which is diluted with sodium sulfate to 67%, and Benzophenone-8, which is supplied as 93% active. The following are the maximum reported product concentrations for each Benzophenone: Benzophenone-1, 1%; Benzophenone-2, 5%; Benzophenone-3, 1%; Benzophenone-4, 10%; Benzophenone-5, ≤0.1%; Benzophenone-6, 1%; Benzophenone-8, 1%; Benzophenone-9, 1%; Benzophenone-11, 5%. Benzophenones-7, -10, and -12 have no current cosmetic use. Product formulation data for Benzophenones are listed in Table 3.<sup>(67,68)</sup>

The cosmetic product formulation computer printout, which is made available by the FDA, is compiled through voluntary filing of such data in accordance with Title 21 part 720.4 of the Code of Federal Regulations (1979). Ingredients are

TABLE 3. Product Formulation Data.<sup>a</sup>

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
<i>Benzophenone-1</i>						
Bath oils, tablets, and salts	1	—	—	—	—	1
Bubble baths	2	—	—	—	—	2
Colognes and toilet waters	3	—	—	—	—	3
Other fragrance preparations	5	—	—	—	—	5
Hair shampoos (noncoloring)	7	—	—	—	—	7
Tonics, dressings, and other hair grooming aids	2	—	—	—	1	1
Wave sets	4	—	—	—	—	4
Other hair preparations (noncoloring)	1	—	—	—	—	1
Blushers (all types)	1	—	—	—	1	—
Lipstick	7	—	—	—	7	—
Nail basecoats and undercoats	5	—	—	—	3	2
Nail polish and enamel	87	—	—	—	2	85
Other manicuring preparations	4	—	—	—	1	3
Aftershave lotions	6	—	—	—	—	6
Beard softeners	2	—	—	—	—	2
Face, body, and hand skin care preparations (excluding shaving preparations)	2	—	—	—	—	2
Moisturizing skin care preparations	3	—	—	—	—	3
1976 TOTALS	142	—	—	0	15	127
1979 TOTALS <sup>c</sup>	113	—	—	1	21	91
<i>Benzophenone-2</i>						
Bath oils, tablets, and salts	3	—	—	—	—	3
Bubble baths	5	—	—	—	1	4
Other bath preparations	6	—	—	—	—	6
Colognes and toilet waters	120	—	—	1	27	92
Perfumes	22	—	—	—	1	21
Sachets	4	—	—	—	—	4
Other fragrance preparations	15	—	—	—	5	10
Hair conditioners	2	—	—	—	—	2
Hair rinses (noncoloring)	4	—	—	—	—	4
Hair shampoos (noncoloring)	14	—	—	—	2	12
Tonics, dressings, and other hair grooming aids	2	—	—	—	—	2
Wave sets	3	—	—	—	3	—
Blushers (all types)	3	—	—	—	—	3
Rouges	1	—	—	—	—	1

TABLE 3. (Continued.)

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
Makeup fixatives	1	-	-	-	-	1
Other makeup preparations (not eye)	4	-	-	-	-	4
Feminine hygiene deodorants	1	-	-	-	-	1
Aftershave lotions	30	-	-	-	6	24
Preshave lotions (all types)	1	-	-	-	-	1
Skin cleansing preparations (cold creams, lotions, liquids, and pads)	6	-	-	-	2	4
Face, body, and hand skin care preparations (excluding shaving preparations)	7	-	-	-	-	7
Moisturizing skin care preparations	8	-	-	-	-	8
Paste masks (mud packs)	1	-	-	-	-	1
Skin lighteners	1	-	-	-	-	1
Skin fresheners	27	-	-	-	-	27
Wrinkle smoothers (removers)	1	-	-	-	-	1
Skin care preparations	5	-	-	-	1	4
Suntan gels, creams, and liquids	1	-	-	-	-	1
Other suntan preparations	1	-	-	-	-	1
<b>1976 TOTALS</b>	<b>299</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>48</b>	<b>250</b>
<b>1979 TOTALS<sup>c</sup></b>	<b>321</b>	<b>80</b>	<b>-</b>	<b>2</b>	<b>32</b>	<b>207</b>
<i>Benzophenone-3</i>						
Bath oils, tablets, and salts	1	-	-	-	-	1
Colognes and toilet waters	1	-	-	-	1	-
Perfumes	1	-	-	-	-	1
Hair shampoos (noncoloring)	1	-	-	-	-	1
Makeup preparations (not eye)	1	-	-	-	1	-
Nail polish and enamel	36	-	-	-	36	-
Aftershave lotions	3	-	-	-	3	-
Skin cleansing preparations (cold creams, lotions, liquids, and pads)	2	-	-	-	-	2
Skin fresheners	1	-	-	-	-	1
<b>1976 TOTALS</b>	<b>47</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>41</b>	<b>6</b>
<b>1979 TOTALS<sup>c</sup></b>	<b>62</b>	<b>-</b>	<b>-</b>	<b>10</b>	<b>45</b>	<b>7</b>
<i>Benzophenone-4</i>						
Baby shampoos	2	-	-	-	-	2
Bath oils, tablets, and salts	11	-	-	-	-	11

TABLE 3. (Continued.)

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
Bubble baths	2	—	—	—	—	2
Other bath preparations	4	—	—	—	—	4
Eye shadow	1	—	—	—	1	—
Colognes and toilet waters	8	—	—	—	—	8
Other fragrance preparations	11	—	—	—	—	11
Hair conditioners	29	—	—	1	2	26
Hair sprays (aerosol fixatives)	1	—	—	—	—	1
Permanent waves	2	—	—	—	—	2
Hair rinses (noncoloring)	7	—	—	—	—	7
Hair shampoos (noncoloring)	45	—	—	1	16	28
Tonics, dressings, and other hair grooming aids	7	—	—	—	1	6
Wave sets	27	—	—	—	1	26
Other hair preparations (noncoloring)	13	—	—	—	—	13
Hair shampoos (coloring)	1	—	—	—	1	—
Blushers (all types)	6	—	—	—	2	4
Makeup foundations	1	—	—	—	—	1
Leg and body paints	1	—	—	—	—	1
Makeup bases	1	—	—	—	1	—
Other makeup preparations (not eye)	2	—	—	—	2	—
Cuticle softeners	2	—	—	—	—	2
Bath soaps and detergents	2	—	—	—	2	—
Aftershave lotions	2	—	—	—	—	2
Skin cleansing preparations (cold creams, lotions, liquids, and pads)	6	—	—	—	1	5
Face, body, and hand skin care preparations (excluding shaving preparations)	9	—	—	—	—	9
Moisturizing skin care preparations	21	—	—	—	—	21
Skin fresheners	5	—	—	—	—	5
Other skin care preparations	9	—	—	—	2	7
Suntan gels, creams, and liquids	2	—	1	—	—	1
1976 TOTALS	240	—	1	2	32	205
1979 TOTALS <sup>c</sup>	251	67	1	1	19	163
<i>Benzophenone-5</i> Face, body, and hand skin care preparations (excluding shaving preparations)	7	—	—	—	—	7



TABLE 3. (Continued.)

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
Night skin care preparations	3	-	-	-	-	3
1976 TOTALS	10	-	-	-	-	10
1979 TOTALS <sup>c</sup>	11	-	-	-	-	11
<i>Benzophenone-6</i>						
Bath oils, tablets, and salts	2	-	-	-	-	2
Colognes and toilet waters	1	-	-	-	-	1
Perfumes	2	-	-	-	1	1
Hair shampoos (noncoloring)	1	-	-	-	-	1
Tonics, dressings, and other hair grooming aids	1	-	-	-	-	1
Wave sets	2	-	-	-	-	2
Cuticle softeners	1	-	-	-	-	1
Nail polish and enamel	77	-	-	-	77	-
Skin cleansing preparations (cold creams, lotions, liquids, and pads)	1	-	-	-	-	1
Moisturizing skin care preparations	2	-	-	-	1	1
1976 TOTALS	90	-	-	-	79	11
1979 TOTALS <sup>c</sup>	106	-	-	-	93	13
<i>Benzophenone-8</i>						
Bath oils, tablets and salts	1	-	-	-	1	-
Hair conditioners	2	-	-	-	2	-
Moisturizing skin care preparations	1	-	-	-	-	1
1976 TOTALS	4	-	-	-	-	4
1979 TOTALS <sup>c</sup>	3	-	-	1	1	1
<i>Benzophenone-9<sup>d</sup></i>						
Bubble baths	20	-	-	-	-	20
Bath capsules	1	-	-	-	-	1
Other bath preparations	34	-	-	-	-	34
Colognes and toilet waters	2	-	-	-	1	1
Perfumes	1	-	-	-	1	-
Other fragrance preparations	1	-	-	-	-	1
Hair conditioners	9	-	-	-	1	8
Hair rinses (noncoloring)	3	-	-	-	-	3
Hair shampoos (noncoloring)	8	-	-	-	3	5
Tonics, dressings, and other hair grooming aids	1	-	-	-	-	1
Wave sets	2	-	-	-	-	2

TABLE 3. (Continued.)

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
Other hair preparations (noncoloring)	1	—	—	—	—	1
Blushers (all types)	1	—	—	—	—	1
Makeup bases	1	—	—	—	1	—
Rouges	1	—	—	—	—	1
Nail basecoats and undercoats	1	—	—	—	—	1
Cuticle softeners	1	—	—	—	—	1
Nail creams and lotions	1	—	—	—	—	1
Aftershave lotions	3	—	—	—	1	2
Skin cleansing preparations (cold creams, lotions, liquids, and pads)	4	—	—	—	2	2
Face, body, and hand skin care preparations (excluding shaving preparations)	14	—	—	—	1	13
Moisturizing skin care preparations	2	—	—	—	—	2
Skin fresheners	9	—	—	—	1	8
Other skin care preparations	1	—	—	—	—	1
Suntan and sunscreen preparations	1	—	—	—	1	—
<b>1976 TOTALS</b>	<b>123</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>13</b>	<b>110</b>
<b>1979 TOTALS<sup>c</sup></b>	<b>85</b>	<b>38</b>	<b>—</b>	<b>—</b>	<b>9</b>	<b>38</b>
<i>Benzophenone-11</i>						
Bath oils, tablets, and salts	4	—	—	—	2	2
Bubble baths	4	—	—	—	—	4
Other bath preparations	1	—	—	—	—	1
Colognes and toilet waters	59	—	—	—	6	53
Perfumes	14	—	—	—	—	14
Sachets	7	—	—	—	—	7
Other fragrance preparations	8	—	—	—	—	8
Hair sprays (aerosol fixatives)	4	—	—	1	2	1
Hair shampoos (noncoloring)	13	—	—	—	—	13
Tonics, dressings, and other hair grooming aids	2	—	—	—	2	—
Wave sets	2	—	—	—	—	2
Blushers (all types)	1	—	—	—	—	1
Nail polish and enamel	3	—	—	—	—	3
Bath soaps and detergents	3	—	—	—	—	3
Aftershave lotions	16	—	—	—	—	16
Preshave lotions (all types)	1	—	—	—	—	1

TABLE 3. (Continued.)

Product category <sup>b</sup>	Total no. containing ingredient	No. product formulations within each concentration range (%) <sup>b</sup>				
		Unreported concentration	>5-10	>1-5	>0.1-1	≤0.1
Face, body, and hand skin care preparations (excluding shaving preparations)	2	-	-	-	-	2
Moisturizing skin care preparations	12	-	-	-	-	12
Skin fresheners	11	-	-	-	-	11
Other skin care preparations	1	-	-	-	-	1
1976 TOTALS	168	-	-	1	12	155
1979 TOTALS <sup>c</sup>	103	65	-	1	10	27

<sup>a</sup>Data from Ref. 67.

<sup>b</sup>Preset product categories and concentration ranges in accordance with federal filing regulations (21 CFR 720.4); see Scope and Extent of Use in Cosmetics.

<sup>c</sup>Data from Ref. 73.

<sup>d</sup>Benzophenone-9 is supplied as a 67% solution; use concentration values may or may not have been adjusted accordingly by manufacturers when submitted to the FDA.

listed in prescribed concentration ranges under specific product-type categories. Since certain cosmetic ingredients are supplied by the manufacturer at less than 100% concentration, the value reported by the cosmetic formulator may not necessarily reflect the true, effective concentration found in the finished product; the effective concentration in such a case would be a fraction of that reported to the FDA. The fact that data are only submitted within the framework of preset concentration ranges also provides the opportunity for overestimation of the actual concentration of an ingredient in a particular product. An entry at the lowest end of a concentration range is considered the same as one entered at the highest end of that range, thus introducing the possibility of a two- to tenfold error in the assumed ingredient concentration.

Benzophenones-1, -3, and -6 are most frequently found in nail polishes (in concentrations up to 1%); Benzophenones-2 and -11 are most frequently used in fragrance preparations (in concentrations up to 1%); and Benzophenones-4, -5, and -9 are generally used in hair, skin, and bath preparations, respectively (in concentrations up to 1%).

Benzophenones are used in at least nine major cosmetic categories. Formulations containing Benzophenones may come into contact with the face, hair and scalp, nails, lips, mucosa, and skin. Products containing Benzophenones are used daily or occasionally; their use may extend over a period of years. Frequency and duration of application may be continuous.

Certain Benzophenones reduce the harmful effects of UV radiation on the skin. The maximum absorption wavelengths for specific Benzophenones are

listed in Table 2. Ultraviolet light is divided into three distinct bands: UV-A (320–400 nm), UV-B (280–320 nm), and UV-C (200–280 nm). Exposing unprotected skin to UV light (primarily in the UV-B range) can induce sunburn and, over a long period of time, promote premature aging of the skin and skin cancer. The harmful effects of UV radiation on the skin have been reviewed.<sup>(44,56,69)</sup>

Benzophenone sunscreens, applied topically, protect the skin from these harmful effects of ultraviolet light by chemically absorbing light energy (photons). As this occurs, the Benzophenone molecule becomes excited to higher energy levels. As the excited molecule returns to its ground state, the energy is released in the form of thermal energy. The hydroxyl group in the ortho position to the carbonyl group is believed to be a structural requirement for the Benzophenones' absorption of UV light. This structural arrangement also contributes to the electronic stability of the molecule. Thus, a surface coating of Benzophenones decreases the amount of UV radiation absorbed by the skin by limiting the total amount of energy that reaches the skin. Benzophenones absorb energy throughout the UV range, though maximum absorbance is between 284 and 287 nm for the 2-hydroxybenzophenones and between 333 and 345 nm for the 2,2'-dihydroxybenzophenones. The effectiveness of any Benzophenone as a sunscreen is determined by its concentration on the skin, the pH of the skin and chemical environment, and the solvent system; a change in either of the latter two conditions can cause the peak absorbance of the Benzophenone to vary.<sup>(6,56,69)</sup>

Benzophenones also protect patients using drugs that have the side effect of eliciting from the individual a photosensitization reaction either phototoxic or photoallergic in nature. A phototoxic reaction occurs when a drug absorbs UV light and transfers energy from it to the vulnerable cell organelles; the damage caused is characterized by a sunburn-like reaction. Photoallergic reactions, on the other hand, involve an immunologic mechanism between the photosensitizing drug and skin proteins. The reaction is characterized by eczematous or polymorphic dermatitis of delayed onset, which will recur with each subsequent exposure to UV light.<sup>(56)</sup> Phototoxic reactions to long-wavelength UV radiation (320–380 nm) occur in patients who used topically applied psoralen for the treatment of vitiligo, a condition in which pigment is lost. Topical application of Benzophenone-4 or Benzophenone-8 (10%) controlled photosensitivity in these individuals.<sup>(70)</sup> Chlorpromazine, a drug frequently used to treat schizophrenia, often produces photosensitivity. Topically applied Benzophenone-4 (10% in a cream base) protected ten such chlorpromazine photosensitized individuals.<sup>(71)</sup> In addition, photosensitivity resulting from the use of chlortetracycline was effectively controlled when patients applied a skin cream containing 10% Benzophenone-4.<sup>(56)</sup> Oleniacz et al.<sup>(72)</sup> reported photosensitivity to UV light in the 300–425 nm range in individuals who used the topical antibacterial agent 3,3',4',5-tetrachlorosalicylanilide (TCSA). A TCSA in vitro study revealed the disruption of lysosomal and mast cell membranes as a primary photosensitizing event, and that TCSA enhanced the light sensitivity of lysosomes, resulting in concomitant edema and erythema. Benzophenone-4 protected TCSA-treated cells from UV radiation. Emmett et al.<sup>(74)</sup> reported that workers who handled absorbers used in the production of UV-cured inks became sensitized to UV light. This reaction induced pruritic dermatitis on sun-exposed surfaces of the body. Topical use of a

cream containing 10% Benzophenone-4 was effective in controlling this sensitization.

Benzophenones are also used as topical agents for the treatment of photo-dermatoses such as solar urticaria (a vascular reaction of the skin marked by wheals) and polymorphous light eruption (a skin eruption confined to sun-exposed surfaces and not attributable to medications or systemic disease).<sup>(75)</sup>

The FDA Panel on Review of Topical Analgesics has proposed that Benzophenones-3, -4, and -8 are safe and effective as active ingredients in sunscreens for over-the-counter (OTC) use at the following concentrations: Benzophenone-3, 2%–6%; Benzophenone-4, 5%–10%; and Benzophenone-8, 3%. The Panel proposed these concentration limits on a combined safety and efficacy basis (a concentration limit may reflect maximum efficacy and not necessarily an indication of toxicity at a higher concentration).<sup>(69)</sup>

### Noncosmetic

Owing to their photostabilizing properties, Benzophenones are used in food and agricultural products, as well as in packaging materials. At maximum concentrations of 0.01% and 0.05%, respectively, Benzophenone-12 is a food stabilizer in petroleum wax and an antioxidant/stabilizer in olefin polymers.<sup>(76,77)</sup> Benzophenone-7 is a commercial grain fungicide, whereas Benzophenone-9 protects the insect pathogens, *Bacillus thuringiensis* (spores) and spruce budworm nuclear polyhedrosis virus, from sunlight's harmful effects.<sup>(78,79)</sup> Benzophenone-2 is used in herbicides, and Benzophenone-3 is added to agricultural films (such as polyvinyl chloride), where it serves as a photostabilizer.<sup>(20,80,81)</sup> When used in packaging materials, Benzophenone-12 prevents UV radiation from reaching the stored product and increases the stability of the container.<sup>(82-84)</sup> Table 4 lists other noncosmetic uses of Benzophenones.

When studying Benzophenones as light stabilizers in packaging, Marcincin and Pikler<sup>(85)</sup> reported that an increase in the number of hydroxyl groups and a decrease in the carbon chain length of the Benzophenone substituents resulted in increased diffusion and extraction of the Benzophenone from the polymer. It was reported that when Benzophenone photostabilizers are used in packaging material, they migrate into aqueous, acidic, or dilute alkaline media, including food.<sup>(86)</sup>

## BIOLOGICAL PROPERTIES

### General Effects

Benzophenone-2 had an insignificant effect when tested for antitumor and antimicrobial activity. When assayed with Sarcoma 180 tumor cell cultures, this ingredient had an ID50 (dose for 50% inhibition of growth) of 17  $\mu\text{g/ml}$ ; tumor inhibition was considered to be insignificant. Antimicrobial activity of Benzophenone-2 against *Escherichia coli* and *Streptococcus fecalis* was also reported to be insignificant (Median inhibitory dose [ID50] =  $> 10^3$  M/l).<sup>(93)</sup>

Benzophenone-7 is a grain fungicide and was detected in starlings throughout the U.S. at concentrations up to 3.33 ppm.<sup>(78)</sup>

**TABLE 4.** Noncosmetic Use of Benzophenones as Light Stabilizers.

<i>Benzophenone</i>	<i>Substances used in</i>	<i>Product use</i>	<i>Ref.</i>
-3	Polyethylene terephthalate	Fabrics, films, magnetic tape	87,88
-3	Polyvinyl butyral	Interlayer safety glass in autos and airplanes	89
-1, -3	Cellulose acetate	Rubber and celluloid subst., films, varnish, lacquer, fabric, records	9
-3, -6, -8	General	Adhesives, lacquers, plastics	5
-1, -3, -6	Polyvinyl chloride	Rubber subst., films, textile finishes, shoe soles, raincoats, insulation, tubing	90
-1, -2, -3, -6, -7, -11	Toluidene Red	Dye	91
-1, -2, -3, -6, -7, -11	Polyester	Tires, rubber subst., clothing, protective coatings, magnetic tapes	92
-1, -2, -3, -6, -7, -11	Acrylic acid resin	In plastics	92
-1, -2, -3, -6, -7, -11	Nitrocellulose	Celluloids, textile fibers, lacquers, rocket propellant	92
-1, -2, -3, -6, -7, -11	Polyvinyl chloride	Celluloids, textile fibers, lacquers, rocket propellant	92
-1, -2, -3, -6, -7, -11	Polystyrene	Packaging, cabinets, containers, refrigerator doors, toys	92

### Absorption, Metabolism, and Excretion

Patel et al.<sup>(94)</sup> studied absorption and excretion of Benzophenone-12 incorporated in the rat diet. Preliminary short-term feeding studies indicated that most of the compound was unabsorbed and passed in the feces; the remainder was absorbed, conjugated, and excreted as a glucuronide in the urine. Long-term absorption and excretion of Benzophenone-12 was studied in 18 male albino rabbits that were maintained on diets containing 0%, 1.25%, or 5.0% Benzophenone-12 for 35 days. Daily food consumption was measured for each animal, and the individual intake of Benzophenone-12 was calculated. Daily samples of the animals' feces and urine were analyzed by paper chromatography for Benzophenone-12 or the glucuronic acid. Two animals from each dietary level were sacrificed for liver and kidney examination after 11, 22, and 35 days of feeding. Urinary excretion of Benzophenone-12 as a glucuronide in animals at both dietary levels of Benzophenone-12 was approximately 10% of the daily dose, whereas the recovery of unchanged Benzophenone-12 from the feces was about 90%. These results indicated that the animals did not retain measurable amounts of Benzophenone-12 even when the compound was ingested over a long period of time.

Patel et al.<sup>(94)</sup> conducted limited metabolism studies on Benzophenone-3 (in which a methoxy group replaces the octyloxy chain of Benzophenone-12). Preliminary results suggested that Benzophenone-3 was absorbed and conjugated to a greater extent than Benzophenone-12, indicating that the length of the alkoxy side-chain influences the degrees to which these compounds are absorbed from the intestine.

## Animal Toxicology

### Acute Toxicity

#### Oral

The Benzophenones have been tested for acute oral toxicity in rats. The animals were weighed and dosed after a one-week observation; the test material was then administered by gastric intubation. Rats were observed daily for 7 to 14 days, during which time food and water were allowed ad libitum; in some instances, animals were sacrificed and autopsied for gross pathology. Results, listed in Table 5, indicate that in acute oral toxicity tests, Benzophenones-1, -3, -6, -8, -9, and -12 are practically nontoxic, whereas Benzophenones-2, -4, and -11 are slightly toxic.

#### Dermal

The acute dermal toxicity of Benzophenones-3, -4, -8, and -12 was tested in albino rabbits. The test substance was applied at various dosages to the epilated skin of the back or flanks and held in contact for 18–24 hours; it was then washed off. Observations were made daily for signs of toxicity and irritation. Animals were autopsied following the 5- to 7-day observation period. Benzophenone-3 had an acute dermal LD50 >16.0 g/kg when applied to rabbits in doses of 2.0–16.0 g/kg. Local skin reactions, consisting of mild to moderate erythema, were observed in two animals at the 2.0 g/kg dose 24 and 48 hours following the exposure period. No significant pathology was revealed upon autopsy.<sup>(95)</sup> Ten rabbits dosed at 5 g/kg Benzophenone-4 had an acute dermal LD50 >5 g/kg. There were no gross signs of toxicity or irritation throughout the observation period; autopsy revealed one animal with congested kidneys.<sup>(96)</sup> The acute dermal LD50 of Benzophenone-8 was determined to be >10 g/kg; ten rabbits dosed at 10 g/kg developed no systemic toxicity, skin irritation, or pathology attributable to dermal application of this compound.<sup>(49)</sup> Benzophenone-12 had an acute dermal LD50 of >10 g/kg when tested on five rabbits; animals developed no systemic toxicity or skin irritation.<sup>(94)</sup> Results of these tests indicate that Benzophenone-8 is relatively harmless and causes no systemic toxicity when applied dermally.

### Subchronic Oral Toxicity

Benzophenones-1, -3, -8, and -12 were tested for subchronic oral toxicity, the results of which appear in Table 6. Benzophenone-1, fed to 40 rats at doses of 0–1.9 g/kg for 90 days, produced depressed growth and liver and kidney lesions in animals at doses of 0.6 and 1.9 g/kg.<sup>(97)</sup> Benzophenone-3 caused no toxic effect in rats when incorporated into their diets (up to 1%) for 27 days; however, in a 90-day study, rats fed 0.5% or 1.0% Benzophenone-3 displayed depressed growth, leucocytosis, anemia, reduced organ weights, and degenerative nephrosis.<sup>(95,98)</sup> When Benzophenone-8 was fed to rats at dietary concentrations of 0%–10%, gross hematuria was occasionally noted at the two highest dose levels (5% and 10%). Upon autopsy, kidney discoloration and liver enlargement (in direct proportion to dose levels of Benzophenone-8) were observed. Hematuria

**TABLE 5.** Acute oral toxicity.

Benzophenone	No. of rats	Conc. (%)	Vehicle	Dose	LD50	Comments <sup>a</sup>	Ref.
-1	50	25	Corn oil	8-32 ml/kg	24.4 ml/kg	Relatively harmless	99
-1		- <sup>b</sup>	Olive oil	-	8.8 g/kg	Practically nontoxic	97
-2	100	5	Corn oil	1-3.5 g/kg	1.22 g/kg	Slightly toxic (convulsion and immediate death at highest dosage)	100
-2		-	Olive oil	-	7.0g/kg	Practically nontoxic	97
-3	25	25	Corn oil	6.25-16 g/kg	11.6 g/kg	Practically nontoxic	100
-3	14	15	Methyl Cellulose	4.5-6 g/kg	>6 g/kg	Pale livers and kidneys, gastrointestinal irritation	101
-3		-	Olive oil	-	7.4 g/kg	Practically nontoxic	97
-3		-	-	-	>12.8 g/kg	Practically nontoxic	98
-4	30	5	Water	0.2-6.4 g/kg	>6.4 g/kg	Practically nontoxic	102
-4	15	0.2 g/ml	Water/agar/tween	2.5-10 g/kg	6.15 g/kg	Practically nontoxic	96
-4	20	20	Agar/tween	1.25-10 g/kg	3.53 g/kg	Slightly toxic (ataxia)	96
-6	25	25	Corn oil	1-16 g/kg	>16 g/kg	Practically nontoxic	103
-8	10	0.2 g/ml	Water	10 g/kg	>10 g/kg	Practically nontoxic	49
-9	25	26.8	Water	6.14-16 g/kg	9.0 g/kg	Practically nontoxic	104
-11	100	5	Corn oil	1.5-3.75 g/kg	3 g/kg	Slightly toxic	103
-12 <sup>c</sup>		-	Olive oil	-	>12 g/kg	Practically nontoxic	97
-12 <sup>c</sup>	10	20	Water	10 g/kg	>10 g/kg	Practically nontoxic	94

<sup>a</sup>According to Hodge and Sterner.<sup>b</sup>No data available.<sup>c</sup>BP-12 has no reported use in cosmetics.



**TABLE 6.** Subchronic and chronic oral toxicity data.

<i>Benzophenone</i>	<i>No. animals/ Species</i>	<i>Dose</i>	<i>No. days on diet</i>	<i>No. deaths</i>	<i>No effect level</i>	<i>Comments</i>	<i>Ref.</i>
-1	40 albino rats	0, 0.19, 0.6, 1.9 g/kg	90	0	0.19 g/kg	Depressed growth, liver and kidney lesions at 0.6 and 1.9 g/kg	97
-3	40 albino rats	0%, 0.01%, 0.1%, 1%	27	0	> 1.0%	No toxic effect	95
-3	120 albino rats	0%, 0.02%, 0.1%, 0.5%, 1.0%	90	0	0.1%	Depressed growth, leucocytosis, anemia, reduced organ weight, nephrosis at 0.5% and 1.0%	98
-8	40 albino rats	0%, 2.5%, 5.0%, 10%	36	0	2.5%	Gross hematuria at 5% and 10%	49
-12	40 albino rats	0, 0.19, 0.6, 1.9 g/kg	90	0	0.6 g/kg	Depressed growth, liver and kidney lesions at 1.9 g/kg	97
-12	160 albino rats	0%, 0.2%, 0.6%, 1.8%	90	2 <sup>a</sup>	> 1.8%	Nontoxic	94
-12	16 beagle dogs	0%, 0.2%, 0.4%, 0.6%	120	0	> 0.6%	Nontoxic	94

<sup>a</sup>Unrelated to ingestion of BP-12.

was explained by the deposition of an insoluble glucuronic acid conjugate of Benzophenone-8 in the kidney tubules.<sup>(49)</sup> Benzophenone-12, fed to 160 rats at concentrations up to 1.8% (approximately 0.9 g/kg) for 90 days, was practically nontoxic at all dose levels.<sup>(94)</sup> In another 90-day study, however, rats dosed at 1.9 g/kg Benzophenone-12 exhibited depressed growth as well as liver and kidney lesions; in this study, 0.6 g/kg was reported to be the "no-effect" level.<sup>(97)</sup>

### Chronic Oral Toxicity

Four groups of beagle dogs, consisting of two males and two females each, were placed on 120-day diets containing 0%, 0.2%, 0.6%, or 1.8% Benzophenone-12 (Table 6). The highest dietary concentration of Benzophenone-12 was lowered from 1.8% to 0.4% after the 14th day because the dogs rejected their food. No significant differences were observed between control and test animals in body and organ weights, hemoglobin, hematocrit, leucocyte counts, and plasma levels of urea nitrogen and alkaline phosphatase. Benzophenone-12 was considered to be nontoxic when ingested as 0.6% in the diet over a period of four months.<sup>(94)</sup>

### Acute Irritation

#### *Skin*

*Irritation:* Procedures outlined by the Federal Hazardous Substances Labeling Act (FHSLA) were used to test Benzophenones for acute skin irritation. An occlusive patch containing 0.5 ml or 0.5 mg of the test ingredient was applied to the intact and abraded skin of albino rabbits. Patches remained in place for 24 hours and were then removed and scored for irritation according to the Draize method. Sites were again scored 24 hours after patch removal. Benzophenones-2, -3, -9, and -11 were nonirritating to intact and abraded skin when tested at concentrations from 4% to 100%. Benzophenones-1, -4, and -6 were minimally irritating (PII = 0.25–0.50) when applied as 16% solutions in dimethyl phthalate (DMP). However, these ingredients were nonirritating at 8% in DMP and at 16% in petrolatum.<sup>(96,104-107)</sup> Table 7 summarizes the results of Benzophenone skin irritation studies.

#### *Phototoxicity and Photosensitization*

A sunscreen containing 3% Benzophenone-8 was tested for potential phototoxicity in guinea pigs. A 0.1 ml dose of the undiluted lotion was applied to four areas of skin on each of three animals. Fifteen to 20 minutes later, two of the sites were exposed to UV-A light (maximum at 360 nm) from four F40BL bulbs at a distance of 12 inches for 60 minutes. The other two sites were nonirradiated controls. All sites were scored 24 hours after application of the test material. The sunscreen containing 3% Benzophenone-8 did not induce erythema at control or irradiated sites indicating a lack of phototoxicity.<sup>(113)</sup>

A sunscreen containing 6% Benzophenone-3 was tested for photosensitization in six albino rabbits. A 0.4 ml dose of the lotion was applied to the clipped dorsal skin of each animal. Skin sites were then irradiated with UV light from a sunlamp. This procedure was repeated five times weekly for two weeks (ten applications total). Sites were scored 24 hours following each irradiation. Mild

TABLE 7. Primary Skin Irritation (FHSLA Procedures).

Benzophenone	No. of albino rabbits	Conc. (%) Vehicle	Primary Irritation Index(PII) <sup>a</sup>	Comments	Ref.
-1	6	16,8,4/Petrolatum	0.00	Nonirritating	107
-1	6	16,8,4/DMP <sup>b</sup>	0.25 (16%)	Minimally irritating (16%)	107
-2	6	100	0.00	Nonirritating	105
-2	6	16,8,4/Petrolatum	0.00	Nonirritating	107
-2	6	16,8,4/DMP	0.00	Nonirritating	107
-3	6	100	0.00	Nonirritating	106
-3	6	100	0.00	Nonirritating	108
-4	6	16,8,4/Petrolatum	0.00	Nonirritating	107
-4	6	16,8,4/DMP	0.50 (16%)	Minimally irritating (16%)	107
-6	6	16,8,4/Petrolatum	0.00	Nonirritating	107
-6	6	16,8,4/DMP	0.25 (16%)	Minimally irritating (16%)	107
-9	6	10.72,5.36,2.68/ Petrolatum	0.00	Nonirritating	107
-9	6	10.72,5.36,2.68/DMP	0.00	Nonirritating	107
-9	6	5.36/Water	0.00	Nonirritating	104,106,109-112
-11	6	16,8,4/Petrolatum	0.00	Nonirritating	107
-11	6	16,8,4/DMP	0.00	Nonirritating	107

<sup>a</sup>Maximum score = 8.

<sup>b</sup>Dimethyl Phthalate.

erythema, mild edema, and desquamation were observed in both test and irradiated control animals; however, no photosensitization occurred in any of the test animals.<sup>(69)</sup>

### Eye

A number of studies have determined the potential irritancy of Benzophenones to the eyes of rabbits. The test material (0.1 ml or 0.1 g) was instilled into one eye of each rabbit; the other eye served as an untreated control. Eyes were examined and scored for irritation daily for a period of three to ten days. Some test procedures included washing of the treated eyes with water four seconds after instillation of the test material. Results of eye irritation tests revealed that most Benzophenones at concentrations of 5%–100% were nonirritating when instilled into the eyes of rabbits. Benzophenones-1, -2, and -4 were slightly to moderately irritating at 100% concentration; however, Benzophenones-1 and -2 were nonirritating when tested at 16% in dimethyl phthalate (DMP) or petrolatum. Although Benzophenone-4 was irritating at concentrations of 8 and 16% in DMP or petrolatum, it was nonirritating when tested as a 5% solution in water. Whereas one study indicated that Benzophenone-11 (5% in DMP) was slightly irritating, another revealed that 16% Benzophenone-11 in DMP was nonirritating. Table 8 summarizes eye irritation data for the Benzophenones.

## Subchronic Skin Irritation and Sensitization

### Irritation

Marzulli and Maibach<sup>(114)</sup> used a 16-day cumulative test on rabbits to study the irritation potential of Benzophenone-4. An alcohol solution containing either

TABLE 8. Primary Eye Irritation.

Benzophenone	Method	No. of albino rabbits	Eye wash Y/N	Test Conc. (%)	Dose	Average score per day <sup>a</sup>							Comments	Ref.
						1	2	3	4	5	6	7		
-1	Draize	6	N	100	100 mg	20	7.00	0	-	-	-	-	Mildly irritating (conjunctiva and cornea)	115
-1	FHSLA	6	N	16,8,4/DMP <sup>b</sup>	0.1 ml	0	0	0	-	-	-	-	Nonirritating	107
-1	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	0	0	0	-	-	-	-	Nonirritating	107
-2	Draize	6	N	100	100 mg	17	15	10.3	3.0	0	-	-	Moderately irritating (conjunctiva and cornea)	110
-2	FHSLA	6	N	16,8,4/DMP	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-2	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-3	FHSLA	6	N	16,8,4/DMP	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-3	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-3	Draize	6	N	100	100 mg	0	0	0	0	-	-	0	Nonirritating	111
-3	Mod. FHSLA	3	N	100	3 mg	0	0	0	0	0	0	-	Nonirritating	101
-3	Mod. FHSLA	6	N	100	100 mg	0	0	0	-	-	-	0	Nonirritating	108
-4	FHSLA	6	N	16,8,4/DMP	0.1 ml	-	-	-	-	-	-	-	Irritating (Cornea, conjunctiva-16%; conjunctiva-8%)	107
-4	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	-	-	-	-	-	-	-	Irritating (Cornea, conjunctiva-16%; conjunctiva-8%)	107

-4	Draize	9	Y-3 rabbits	5/water	0.1 ml	0	0	0	0	-	-	0	Nonirritating	116
-4	Draize	6	N	100	100 mg	2.58	2.38	2.05	-	-	-	-	Irritating to iris and conjunctiva	96
-6	FHSLA	6	N	16,8,4/DMP	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-6	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-6	Draize	6	N	100	100 mg	0	0	0	0	-	-	0	Nonirritating	109
-8	-	5	N	100	100 mg	0	0	0	-	-	-	0	Nonirritating	49
-9	FHSLA	6	N	10.72,5.36,2.68/DMP	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-9	FHSLA	6	N	10.72,5.36,2.68/Petrolatum	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-9	Draize	6	N	5.36/water	0.1 ml	0	0	0	0	-	-	0	Nonirritating	112
-11	FHSLA	6	N	16,8,4/DMP	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-11	FHSLA	6	N	16,8,4/Petrolatum	0.1 ml	0	0	0	-	-	-	0	Nonirritating	107
-11	Draize	9	N	5/DMP	0.1 ml	2.89	0.67	0	0	0	0	0	Slightly irritating to conjunctiva in all rabbits	104
-12	Draize	5	N	100	100 mg	0	0	0	0	0	0	0	Nonirritating	94

<sup>a</sup>Maximum score = 110.

<sup>b</sup>Dimethyl phthalate.

10% or 1% Benzophenone-4 was applied uncovered to the depilated backs of six New Zealand albino rabbits. Twenty-four hours later the sites were scored for irritation, and the solution was reapplied. This procedure was repeated every other day for five weeks, until a total of 16 applications of Benzophenone-4 had been made. The average cumulative irritation score was then calculated (maximum score = 64); applications of Benzophenone-4 (10%) and Benzophenone-4 (1%) produced scores of 3.6 and 0.3, respectively.

#### *Sensitization*

Benzophenone-3 was tested for sensitizing potential using the Kligman Maximization Procedure. A 0.05 ml intradermal injection of 5% Benzophenone-3 in corn oil or 50% Benzophenone-3 in aqueous Freund's Adjuvant was administered to the shaved back of each of ten female albino guinea pigs per solution. Seven days following injection, a topical booster patch containing 10% Benzophenone-3 in petrolatum was applied for 48 hours. Two weeks later, a challenge test of 0.1 ml of 2.5% Benzophenone-3 in petrolatum was applied under an occlusive patch to a virgin site for 24 hours. Sites were scored 24 and 48 hours after patch removal. Results of this test indicated that Benzophenone-3 was not a skin sensitizer.<sup>(117)</sup>

### **Special Studies**

#### *Mutagenesis*

The Ames *Salmonella*/Mammalian-Microsomal Assay was used to test Benzophenones-1, -2, -3, -4, -6, -8, -9, and -11 for mutagenicity. *Salmonella typhimurium* strains TA98, TA100, TA1535, TA1537, and TA1538 were used; all tests were performed in the presence and absence of Aroclor-induced rat liver microsomal S-9 cell fraction to observe the mutagenic effect of each compound following metabolic activation. Preliminary cytotoxicity studies determined the dose range of each compound to be used. The results of these tests appear in Table 9. All Benzophenones were nonmutagenic when assayed directly. All but three Benzophenones (-2, -6, and -8) were nonmutagenic with metabolic activation. Benzophenone-8 was weakly mutagenic in *Salmonella* strain TA1537; whereas, Benzophenone-6 was determined to be mutagenic at three doses in the same strain (TA1537). Benzophenone-2, in the presence of rat liver microsomes, induced a "small but fairly consistent increase in the number of mutants" in four *Salmonella* strains tested. At doses of 100–300 µg, Benzophenone-2 induced mutant increases of 50–100% in TA100 and 200%–500% in TA1537. A mutant increase of 50% was observed in strains TA98 and TA1535, but these strains had not been tested enough times to provide conclusive results. The investigator suggested that "the small and somewhat erratic nature of the (mutagenic) response we have seen raises the possibility that the observed effect may be due to the presence of an impurity." The purity of the test sample was 99% (lab-grade) and was assumed to be purer than that of the cosmetic-grade. Additional tests using lab-grade Benzophenone-2 found this ingredient to be mutagenic in TA1537 at doses of 200 and 750 µg when activated by Aroclor-induced hamster liver enzymes. Preliminary assays of cosmetic-grade Benzophenone-2 revealed mutagenic activity not differing significantly from that of the purer lab-grade.<sup>(118-122)</sup>

**TABLE 9.** Ames *Salmonella* Mutagenesis Assay.<sup>a</sup>

Benzophenone	Dose range (µg) (Solvent)	Results <sup>b</sup> without S-9 metabolic activation					Results <sup>b</sup> with S-9 metabolic activation					Comment
		TA98	TA100	TA1535	TA1537	TA1538	TA98	TA100	TA1535	TA1537	TA1538	
-1	0.1-500 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation
-2	0.1-10,000 (DMSO)	(-)	(-)	(-)	(-)	- <sup>c</sup>	(+)	(+)	(+)	(+)	- <sup>c</sup>	Mutagenic with S-9 activation in all strains (see text)
-2	10-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation
-3	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation
-4	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation
-6	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(+)	(-)	Mutagenic only in TA1537 with S-9 activation at 10 and 100 µg. Toxic to TA1537 at 500 and 1000 µg with S-9
-8	7.0-700 (ETOH)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(+)	(-)	Dose-dependent, weak but significant mutagen in TA1537 with S-9 activation only
-9	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation
-11	10-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation

<sup>a</sup>Data from Refs. 118-122.<sup>b</sup>(-) = Nonmutagenic; (+) = mutagenic.<sup>c</sup>No data.

An in vitro cytogenic assay was used to evaluate the ability of Benzophenone-2 to induce sister chromatid exchange (SCE) and chromosome aberrations (CA) in L5178Y mouse lymphoma cells. Assays were performed in the presence and absence of Aroclor-induced rat liver microsomal enzymes (S-9). The solubility of Benzophenone-2 in DMSO and its cytotoxicity were first determined. For the mutagenesis assays, doses of 6.250–200.00  $\mu\text{g}$  Benzophenone-2 per plate were used. When assayed in the absence of S-9, Benzophenone-2 induced small but “biologically insignificant” increases in SCE frequency at 100 and 200  $\mu\text{g}$ ; CA frequencies were not elevated at any dose. With metabolic activation, however, Benzophenone-2 produced “statistically and biologically significant” increases in SCE frequency at the three highest dose levels, indicating a dose-response relationship. The author noted that Benzophenone-2 was more toxic to cells under the activation system; only 17 scorable cells were located at the 100  $\mu\text{g}$  dose. The investigator reported that 10 CAs (including a quadriradial, a translocation, and two triradials) were observed among the 67 cells scored at the two highest doses with activation. He concluded that Benzophenone-2 does not directly induce significant SCE or CA increases but does, under metabolic activation, induce these changes.<sup>(123)</sup>

A Mouse Lymphoma Forward Mutation Assay was used to test Benzophenones-2 and -8 for mutagenesis. The L5178Y TK+/- cell line was used; assays were performed in the presence and absence of an Aroclor-induced rat liver microsomal preparation (S-9). Materials were dissolved in DMSO and tested for preliminary cytotoxicity to determine doses to be used in the assays.

Without activation, Benzophenone-2 was mutagenic at “highly toxic” doses. In the presence of S-9, Benzophenone-2 became more toxic. An increase in the mutant frequency (3.0–6.8 times) was observed with the three most toxic doses. A dose-response relationship was not demonstrated. The investigator suggested that Benzophenone-2 “appears to react with microsomal system to yield a mutagenic product that induces mutants at lower applied concentrations and toxicities than under nonactivation conditions.” It was concluded that Benzophenone-2 induced an increase in mutations at the TK locus in L5178Y mouse lymphoma cells only for highly toxic doses with or without metabolic activation and that this material is weakly mutagenic under the conditions of the test.<sup>(123)</sup> These findings need to be reconfirmed since there was no dose-response pattern of toxicities over the preferred relative growth range in any of the trials; increases in mutant frequency in the assays occurred only at levels bordering total lethality; and the lethal dose was poorly reproduced from one trial to another with metabolic activation.

When assayed directly, Benzophenone-8 did not induce mutant frequencies significantly greater than those of controls. With metabolic activation, however, Benzophenone-8 induced dose-dependant mutant frequency increases of 3.8 and 2.0 times for the two highest doses (32 and 24  $\mu\text{g}$ , respectively). The investigator concluded that, under the test conditions, Benzophenone-8 is nonmutagenic when assayed directly, but under metabolic activation it induces a significant, dose-dependent increase in mutant frequency.<sup>(118)</sup>

#### *Other*

No information was available on any of the Benzophenones with respect to teratogenesis and carcinogenesis.



## Clinical Assessment of Safety

### Skin Irritation and Sensitization

Benzophenones were tested for potential irritation and sensitization to human skin. In general, these ingredients were reported to be nonirritating and nonsensitizing at concentrations higher than those found in cosmetics. Table 10 summarizes the results of these studies.

Four studies reported irritation and/or sensitization to Benzophenones. Benzophenone-2 was applied to 50 subjects in a Shelanski repeated insult patch test (RIPT). Induction patches were applied to the subject's skin for 24 hours every other day for a total of 15 patches. The initial nine patches contained a 4.9% Benzophenone-2 solution; the remaining six patches contained a 2.45% Benzophenone-2 solution. Two weeks after removal of the last induction patch, a challenge patch containing 2.45% Benzophenone-2 was applied to the original test site. All sites were scored upon patch removal. Sixteen of 50 subjects reacted to one or more of the induction patches; responses of 1+ to 3+ (maximum score = 4+) were observed. Four subjects reacted to the challenge patch with responses of 1+ and one with 2+. The investigators concluded that at 4.5%, Benzophenone-2 is not a primary irritant but is a "fatiguing agent" and possibly a sensitizer.<sup>(124)</sup>

A Modified Draize/Shelanski RIPT was used to study the irritancy and sensitizing potential of a sunscreen containing a 3.0% Benzophenone-3 in 57 subjects. One subject displayed erythema (1+ response) to the final induction and challenge patches; no reaction was elicited by a challenge patch on a virgin site. This subject was repatched 11 months later with each component of the sunscreen. Benzophenone-3 in ethyl alcohol was applied under occlusion to her upper arm for 24 hours. The site was scored at 48 and 72 hours. Spreading erythema and mild edema (2+ response) was elicited at 48 hours; by 72 hours only erythema (1+ response) was observed. It was concluded that this test subject was sensitized to Benzophenone-3. The investigators concluded that the product containing 3% Benzophenone-3 may have a "minimum potential for inducing sensitization under the exaggerated conditions of the test."<sup>(125)</sup>

Benzophenone-8 was tested for irritation and sensitization using a Modified Draize/Shelanski RIPT. Ten induction patches containing 25% Benzophenone-8 in petrolatum were applied to each of 100 subjects. Following a one-week rest, a challenge patch containing 10% Benzophenone-8 in petrolatum was applied to a fresh skin site. Seven subjects reacted to both induction and challenge patches; these results indicated contact sensitivity. Moreover, one subject exhibited 2+ reactions for induction patches 8-10 and a 4+ reaction to the challenge patch. The authors concluded that Benzophenone-8 (25%) is a moderate sensitizer.<sup>(50)</sup>

Benzophenones-4 and -11 were tested for potential skin irritation in separate single insult patch tests. Each ingredient was applied at concentrations of 16, 8, and 4% in DMP and in petrolatum to the skin of each of 14 subjects. At a concentration of 16% in either base, Benzophenones-4 and -11 were irritating to four and two subjects, respectively. Neither ingredient was irritating at concentrations of 4% or 8% in either vehicle.<sup>(107)</sup>

Marzulli and Maibach<sup>(114)</sup> tested the potential irritancy of Benzophenone-4 on six adult white humans. Patches containing 1% or 10% Benzophenone-4 in

**TABLE 10.** Human Patch Test Data.

<i>Benzophenone</i>	<i>Test method<sup>a</sup></i>	<i>No. of subjects</i>	<i>Effective conc. (%)</i>	<i>No. of reactions</i>	<i>Comments</i>	<i>Ref.</i>
-1	Shelanski RIPT	100	1 in butyl carbitol	0	Nonirritating/nonsensitizing	126
-1	SIPT	14	16,8,4/DMP			
			16,8,4/Petrolatum	0	Nonirritating	107
-2	Shelanski RIPT	50	2.45 and 4.9/H <sub>2</sub> O	17/50 – induction 5/50 – challenge	Evidence of fatiguing and possible sensitization at 5%; none at 2.5%	124
-2	SIPT	14	16,8,4/DMP 16,8,4/Petrolatum	“Mild reactions similar to toilet soap”	Nonirritating	107
-3	SIPT	14	16,8,4/DMP 16,8,4/Petrolatum	0	Nonirritating	107
-3	Mod. D/S RIPT	100	25 – induction in petrolatum 10 – challenge in petrolatum	0	Nonirritating/nonsensitizing	50
-3(3% in a lotion)	Mod. Draize RIPT	203	3.0	0	Nonirritating/nonsensitizing	113
-3(3% in a sunscreen)	SIPT (48 hr)	100	3.0	0	Nonirritating	69
-3(3% in a sunscreen)	Mod. D/S RIPT	150	3.0	“several nonspecific reactions”	“Not a primary irritant”; nonsensitizing	69
-3(3% in a sunscreen)	Mod. Draize RIPT	150	3.0	Mild irritation (but no sensitization) challenge patches	Nonsensitizing	69
-3(3% in a sunscreen)	Mod. D/S RIPT	57	3.0	1 sensitized reaction	Minimum sensitizing potential	125
-4	SIPT	14	16,8,4/DMP	Four subjects reacted to 16% BP-4 in DMP and petrolatum.	Irritating at 16% in DMP and petrolatum	107
			16,8,4/Petrolatum	One subject reacted to 8% BP-4 in DMP and Petrolatum.		

Distributed for Comment Only -- Do Not Cite or Quote

-4	Shelanski RIPT	50	5-in H <sub>2</sub> O	0	Nonirritating/nonsensitizing	127
-4	Mod. D/S RIPT	100	25-induction/ Petrolatum 10-challenge/ Petrolatum	0	Nonirritating/nonsensitizing	50
-6	SIPT	14	16,8,4/DMP 16,8,4/Petrolatum	0	Nonirritating	107
-6	Shelanski RIPT	50	100	0	Nonirritating/nonsensitizing	109
-8	Mod. D/S RIPT	100	25-induction/ Petrolatum 10-challenge/ Petrolatum	Seven cases of irritation to induc- tion and challenge patches	Contact sensitizing	50
-8(2% in a lotion)	Mod. Draize RIPT	205	2	0	Nonirritating/nonsensitizing	113
-9	SIPT	14	10.72,5.36,2.68/ DMP 10.72,5.36,2.68/ Petrolatum	0	Nonirritating	107
-11	SIPT	14	16,8,4/DMP 16,8,4/Petrolatum	Two subjects reacted to 16% BP-11 in DMP and petrolatum.	Nonirritating at 8 and 4%	107
-11	Shelanski RIPT	50	20-in butyl carbitol acetate	0	Nonirritating/nonsensitizing	128
-12	Mod. D/S RIPT	50	25-induction/ Petrolatum 10-challenge/ Petrolatum	0	Nonirritating/nonsensitizing	94

<sup>a</sup>Shelanski double insult patch test- 120-hr patch/3 wk rest/48-hr patch (challenge) to original site.  
 Single Insult Patch Test (SIPT)- 24-hr patch.  
 Shelanski repeated insult patch test (RIPT)- 15 (24-hr patch/24-hr rest)/2-wk rest/24-hr patch (challenge) to original site.  
 Modified Draize/Shelanski RIPT- 10 (21-hr patch/24-hr rest)/1-wk rest/24-hr patch (challenge) to virgin site.  
 Modified Draize RIPT- 10 (24 hr-patch/24 hr-rest)/2-wk rest/72-hr patch (challenge) to virgin site.

alcohol were applied to the subjects for 24 hours, after which time the patches were removed, the sites scored, and fresh patches applied. This procedure was repeated every other day, three days per week for seven weeks, until a total of 21 patches had been made. The mean cumulative irritation scores for 1% and 10% solutions were 8.6 and 53.1, respectively (maximum score = 84). The latter value is indicative of a primary irritant.

Fisher<sup>(129)</sup> reported that "in the past ten years of patch testing on hundreds of patients [at his practice], only two patients have been allergic to Benzophenone-4." He concluded that this indicates "very low sensitivity" in the population, and that this ingredient is safe for general use.

No data were available regarding the clinical assessment of Benzophenone-5.

The scientific literature generally confirms the clinical safety of topically used Benzophenones; however, several cases of contact sensitivity to these ingredients have been reported. Pariser<sup>(130)</sup> reported contact dermatitis caused by topical use of a sunscreen containing 3% Benzophenone-3 and 3% Benzophenone-8. "Standard" patch tests of the sunscreen lotion, 2% Benzophenone-8 (in petrolatum), or 2% Benzophenone-3 (in petrolatum), revealed irritation at 48 and 72 hours to the first two and mild irritation at 72 hours to the last. Ramsey et al.<sup>(131)</sup> reported a case of contact sensitivity resulting from topical use of a suntan lotion containing 10% Benzophenone-4. A scratch test of a 1% Benzophenone-4 solution resulted in a 2+ response; a 1% Benzophenone-3 solution also elicited a 2+ reaction. A single 24-hour patch test of a 5% Benzophenone-4 solution (aqueous) revealed a 2+ papular reaction at 24 and 48 hours. Thompson et al.<sup>(132)</sup> reported that a 62-year-old man with a history of photosensitivity developed contact dermatitis after he used a sunscreen containing Benzophenones-3 and -8 (no concentrations given). Patch tests of the lotion or of the individual Benzophenones at product concentrations resulted in 2+ reactions at 48 hours.

## **Photosensitivity**

### *Phototoxicity*

Cosmetic products containing Benzophenones-2, -3, or -4 (0.1%–3.5%) were tested for phototoxicity in humans (Table 11). In each study, the test material was applied under occlusion to the subject's skin for 24 hours. Sites were then scored, exposed to UV radiation, and then scored daily for up to seven days. Nonirradiated/treated and nontreated/irradiated controls were frequently used. Products containing Benzophenones-2, -3, and -4 were nonphototoxic in all studies; however, a number of subjects experienced slight irritation (usually a 1+ response) to the test material.

### *Photoallergenicity*

Cosmetic products containing up to 3.5% Benzophenone-3 were tested for photoallergenicity potential in humans (Table 11). In each study, the protocol was similar to that for phototoxicity except that the procedure was repeated three times weekly until 10 or 12 induction applications had been made. Following a 10- to 14-day rest, 24-hour challenge patches were applied to the original site

TABLE 11. Clinical Photosensitivity.

Benzophenone (Product)	Benzophenone Test conc. (%)	Test	No. of subjects	UV-light source <sup>a</sup>	Reactors <sup>b</sup> /Photosens.	Conclusion/Comments	Ref.
-2(bath prep)	0.0005	Phototox. <sup>c</sup>	22	Sunlight	9(1 + ;c,i)/0	Nonphototoxic (reactions due to primary irritation)	134
-2(bath prep)	0.0005	Phototox. <sup>c</sup>	22	Sunlight	6(1 + ;c,i)/0	Nonphototoxic (reactions due to primary irritation)	134
-2(bath prep)	0.0005	Phototox. <sup>c</sup>	22	Sunlight	5(1 + ;c,i)/0	Nonphototoxic (reactions due to primary irritation)	134
-3(face lotion)	2	Phototox.	10	BL	0/0	Nonphototoxic	125
-3(suntan lotion)	3.5	Phototox.	10	BL	0/0	Nonphototoxic	125
-3(eye cream)	2	Phototox.	10	BL	0/0	Nonphototoxic	133
-3(lotion)	3.5	Phototox.	28	BL/HQML	0/0	Nonphototoxic	40
-3(sunscreen)	1	Phototox.	10	XASS	10/0	Nonphototoxic (minimal irritation due to presence of UV-B light)	135
-3(sunscreen)	3	Phototox.	12	BL	1(1 + ;c,i)/0	Nonphototoxic (slightly irritating to 1 subject)	125
-3(sunscreen)	3	Phototox.	26	-	0/0	Nonphototoxic	69
-4(skin prep)	0.1	Phototox.	25	Sunlight	0/0	Nonphototoxic	136
-3(suntan lotion)	3.5	Photoall.	27	BL	3(1 + ;c,i - induct)/ 1(1 + ;c,i,o,v)/0	Nonphotoallergenic (primary irritation/1 subject sensitized)	125
-3(face lotion)	2	Photoall.	27	BL	2(1 + ;i) 1(1 + ;c)	Nonphotoallergenic (primary irritation)	125
-3(eye cream)	2	Photoall.	28	BL	1(c,i,o)/0	Nonphotoallergenic (1 subject sensitized)	133
-3(lotion)	3.5	Photoall.	28	BL	0/0	Nonphotoallergenic	40
-3(sunscreen)	3	Photoall.	30	BL	1(2 + ;c,i,o)/0	Nonphotoallergenic (1 subject sensitized to BP-3)	125
-3(sunscreen)	3	Photoall.	25	-	0/0	Nonphotoallergenic	69

<sup>a</sup>sunlight (UV-A, UV-B); XASS - Xenon arc solar simulator (UV-A); BL - F40 black lights (UV-A); HQML - Hot quartz mercury lamp (UV-B).

<sup>b</sup>c = control site; i = irradiated site; o = original site (challenge); v = virgin site (challenge).

<sup>c</sup>Procedure repeated daily for five consecutive days.

and/or a fresh site. Sites were scored upon patch removal and daily for up to four days. The products containing Benzophenone-3 were nonphotoallergenic in all studies; however a number of subjects experienced irritation or sensitization to the test material. One of 30 subjects reacted (2+ response) to one induction patch and the challenge patches, each containing 3.0% Benzophenone-3 sunscreen. Irritation persisted throughout the 72-hour observation period. When this subject was rechallenged six weeks later, similar reactions were observed at original and virgin sites. Eleven months later, the subject was patched with each component of the sunscreen. Benzophenone-3 induced sensitization in this individual. The investigators concluded, however, that the product containing 3% Benzophenone-3 is nonphotoallergenic.<sup>(125)</sup>

One subject with a history of contact sensitivity to cosmetics reacted to a challenge patch containing 2% Benzophenone-3 applied to the original site. The reaction occurred at both control and irradiated sites. However, no irritation resulted from patches applied to a fresh site.<sup>(133)</sup> Three of ten subjects reacted to a total of five induction patches containing 2% Benzophenone-3 in a face lotion. No irritation resulted from challenge patch application.<sup>(133)</sup> The suntan lotion (3.5% Benzophenone-3) caused several reactions to induction patches concurrently at control and irradiated sites. Although one subject developed irritation (1+) to the challenge patches at original and virgin sites, the response occurred at both control and irradiated sites.<sup>(125)</sup>

### Other Clinical Experience

Benzophenones-3 (2%–10%); -4 (1%–10%); -8 (2%–10%); and -10 (0.5%–10%) have been tested for sunscreen efficacy in more than 121, 167, 130, and 295 human subjects, respectively, and under various sources of UV radiation (Table 12). In all tests combined, there was no report of irritancy or phototoxic reaction to these ingredients.

## SUMMARY

Benzophenones-1 to -12 are substituted derivatives of 2-hydroxybenzophenone. These ingredients have similar chemical and physical properties. Benzophenones-7, -10, and -12 have no current use in cosmetics; however, they are used noncosmetically as fungicides, pharmaceutical sunscreens, and antioxidant/photostabilizers. In addition to their widespread use as photostabilizers in cosmetics, Benzophenones, have a photoprotective effect on the skin. Benzophenones are typically used in cosmetic formulations at concentrations up to 1%; however, concentrations of up to 5 or 10% are reported for certain Benzophenones.

Benzophenones-3, -4, and -8 are registered with the FDA as safe and effective sunscreen ingredients (at concentrations up to 10%) for OTC use and as indirect food additives (Benzophenone-12, up to 0.01%). These sunscreens play an active role in protecting individuals who have photodermatoses, especially drug-mediated.

When ingested, absorbed Benzophenones were primarily conjugated and

TABLE 12. Benzophenone Sunscreen Efficacy Tests.

<i>Benzophenone</i>	<i>Conc. tested (%)</i>	<i>No. of subjects</i>	<i>UV radiation source</i>	<i>Ref.</i>
-3	3	9-17	Solar simulator	69
	3	18	Solar simulator	69
	3	20	Sunlight	55
	2	10	Xenon arc solar simulator	63
	5	10	Xenon arc solar simulator	63
	10	10	Xenon arc solar simulator	63
	3	12	Germicidal mercury lamp	38
	3	23	Prism grating monochrom.	45
	3	9	Sunlight	137
-4	1-3	10	Solar simulator	69
	10	5	Sunlight	69
	10	10	Ultraviolet lamp	71
	10	10	Hot quartz lamp	62
	10	20	Sunlight	55
	5	10	Xenon arc solar simulator	63
	5	12	Germicidal mercury lamp	38
	10	12	Germicidal mercury lamp	38
	10	16 normal 10 photosens.	Quartz mercury lamp	138
	10	30	Sunlight	139
	10	6	Mercury UV lamp	45
	10	16	Prism grating monochrom.	45
-8	3	9	Sunlight	69
	3	33	Sunlight	69
	3	20	Sunlight	55
	2	10	Xenon arc solar simulator	63
	5	10	Xenon arc solar simulator	63
	10	10	Xenon arc solar simulator	63
	3	12	Germicidal mercury lamp	38
	3	17	Prism grating monochrom.	45
	3	9	Sunlight	137
-10	10	86	Sunlight	140
	0.5	104 normal 28 photosens.	Xenon arc monochromator	57
	-	77	-	58

excreted in the urine, while the unabsorbed material passed out with the feces. Benzophenones were practically nontoxic when administered orally to rats, and Benzophenones-3, -4, -8, and -12 were nontoxic when applied to the skin of rabbits at doses of > 5 g/kg. In subchronic oral toxicity studies, Benzophenones-3 and -12, at 1% and 1.8% in the diet, respectively, were nontoxic to rats. Benzophenones-1 and -12 elicited toxic effects in rats at 0.6 and 1.9 g/kg, respectively, when fed for 90 days. In the same time period, Benzophenone-3, fed at 0.5% in the diet, and Benzophenone-8, fed at 5%, produced toxic effects. In a 120-day feeding study, Benzophenone-12 was nontoxic to dogs at a concentration of 0.6% in the diet.

Benzophenones were nonirritating or mildly irritating when applied to rabbit skin at concentrations of up to 100%. Benzophenones were practically nonirritating to the eyes of rabbits, even when instilled undiluted. A subchronic skin irritation test revealed that Benzophenone-4 was capable of causing minimal irritation (in rabbits) at a concentration of 10%. When Benzophenone-3 was tested for potential sensitization through the Kligman Guinea Pig Maximization procedure, it was reported to be nonsensitizing. Benzophenone-8 (3%) and Benzophenone-3 (6%) were nonphototoxic in guinea pigs and rabbits, respectively.

Benzophenones-2, -6, and -8 were reported to be weakly mutagenic with metabolic activation in the Ames test. Benzophenones-6 and -8 were mutagenic in one *Salmonella* strain only. In a Mouse Lymphoma Forward Mutation Assay and a cytogenic assay, Benzophenone-2 was weakly mutagenic at high concentrations and with metabolic activation. All other Benzophenones were nonmutagenic both with and without metabolic activation in the Ames test.

Benzophenones were tested for skin irritation and sensitization in humans. In general, these ingredients were mildly irritating and sensitizing at concentrations greater than those used in cosmetics. The published scientific literature reports isolated incidences of contact sensitization to Benzophenones-3, -4, and -8.

Sunscreens and other cosmetic products containing Benzophenones-2, -3 and -4 (at concentrations of 0.1%–3.5%) were tested for phototoxicity and/or photosensitivity in a number of studies. All products were reported to be nonphototoxic and nonphotoallergenic, although instances of primary irritation and contact sensitization to these products were observed.

Benzophenones-3, -4, -8, and -10 were tested extensively for sunscreen efficacy; no instances of irritation or phototoxicity were reported.

## DISCUSSION

Benzophenones-1, -2, -3, -4, -5, -6, -8, -9, and -11 are photostabilizers in cosmetics. Benzophenones-7, -10, and -12 have no reported cosmetic use, yet they are used noncosmetically as fungicides, pharmaceutical sunscreens, and antioxidant/photostabilizers, respectively. Relevant chemical, use, toxicological, and clinical data on Benzophenones-2, -6, and -8 have been included in this report. The mutagenicity data on these three ingredients are available in a subsequent Addendum to the Final Report.

Benzophenones-3, -4, and -8 are approved by the FDA for use as safe and effective OTC sunscreen ingredients at concentrations equal to or greater than those used in cosmetics.

Although there are no animal toxicology or clinical data for Benzophenone-5, this ingredient is simply the sodium salt of Benzophenone-4. It would be expected that Benzophenones-4 and -5 have similar biological properties (i.e., toxicity, irritancy potential, etc.). At high concentrations, Benzophenone-5 may be an eye irritant; however, it would not be expected to induce significant ocular irritation at cosmetic use concentration ( $\leq 0.1\%$ ).

All Benzophenones were tested for mutagenesis under the Ames *Salmonella* test. All Benzophenones were nonmutagenic when assayed directly, and all but



Benzophenones-2, -6, and -8 were nonmutagenic following metabolic activation. Benzophenones-6 and -8 were weakly mutagenic at high doses in only one strain (TA1537). Benzophenone-2 was nonmutagenic with and without activation in one Ames test, but in another test it was mutagenic under activation in four *Salmonella* strains. Benzophenone-2 was also reported to be weakly mutagenic under activation conditions in a cytogenic assay and in a forward mutation assay.

Benzophenones-1, -5, -6, -9, and -11 lack photosensitivity data, but because of their conditions of use, as well as similarities in chemical structure and UV-absorption spectra to other Benzophenones, these five ingredients would not be expected to induce phototoxicity or photoallergenicity.

## CONCLUSION

On the basis of the available animal data and clinical human experience presented in this report, the Panel concludes that Benzophenones -1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics.

## ACKNOWLEDGMENT

Kevin Fisher, Scientific Analyst and writer, prepared the literature review and technical analysis used by the Expert Panel in developing this report.

## REFERENCES

1. SAHARIA, G.S. and SHARMAN, B.R. (1957). Hydroxy ketones. III. Fries reaction of the esters of o- and m-methoxybenzoic acids and a study of the mechanism. *J. Sci. Ind. Res. (India)* **16B**, 125-8.
2. GROVER, P.K., SHAH, G.D., and SHAH, R.C. (1955). Xanthones. IV. A new synthesis of hydroxyxanthones and hydroxybenzophenones. *J. Soc. Cosmet. Chem.* 3982-5.
3. COSMETIC, TOILETRY AND FRAGRANCE ASSOCIATION (CTFA). (1979). *Cosmetic Ingredient Chemical Description: Benzophenones*.\*
4. HAYASHI, M. Benzophenone derivatives. (1929). *J. Prakt. Chem.* **123**, 289-312.
5. STECHER, H. (1958). Ultraviolet-absorptive additives in adhesives, lacquers, and plastics. *Adhesion* **2**(6), 243-4.
6. NURMUKHAMETOV, R., SHIGORIN, D., and MILESHINA, L. (1967). Mechanism of inhibition of polymeric photochemical degradation with hydroxy benzophenone stabilizers. *Vysokomol. Soedin.* **9**(1), 26-31.
7. PIVOVAROV, A.P., ERSHOV, A., and LUKOVNIKOV, A.F. (1966). Mechanism of light stabilizing of polypropylene by various additives. *Plast. Massy* **10**, 7-9.
8. KYSEL, O. (1969). Acid-base equilibriums in the ground and excited state of photo-stabilizers. Benzophenone derivatives. *Kinet. Mech. Polyreactions, Int. Symp. Macromol. Chem., Prepr.* **5**, 263-70.
9. MAKHKAMOV, K., VIRNIK, A.D., and ROGOVIN, Z.A. (1965). *Effect of chemical structure of some stabilizers on the light stability of cellulose acetate fabrics.* *Tekstil'n. Prom.* **25**(1), 28-30.
10. HOLM, T. and CROSSLAND, I. (1971). Mechanism of the Grignard addition reaction. VIII. Reaction rates

---

\*Available upon request: Administrator, Cosmetic Ingredient Review, Suite 810, 1110 Vermont Ave., NW Washington, DC 20005.

- and product distribution for the reactions of teributyl-magnesium chloride and methylmagnesium bromide with substituted Benzophenones. *Acta Chem. Scand.* **25**, 59-69.
11. PITTS, Jr., J.N., JOHNSON, H.W., and KUWANA, T. (1962). Structural effects in the photochemical processes of ketones in solution. *J. Phys. Chem.* **66**, 2456-61.
  12. OTTERSTEDT, J.E.A. (1973). Photostability and molecular structure. *J. Chem. Phys.* **58**, 5716-25.
  13. KAMOGAWA, H. (1969). Responsive polymers. V. Preparation of some polymeric phenolic ultraviolet absorbers. *Kogyo Gijyusui Sen'i Kogyo Shikensho Kenkyu Hokoku* **86**, 95-6.
  14. UHDE, W.J. and ZYDEK, G. (1968). Thin-layer chromatography of substituted 2-hydroxybenzophenones. *Fresenius' Z. Anal. Chem.* **239**(1), 25-6.
  15. SIMPSON, D. and CURREL, B.R. (1971). Determination of certain antioxidants, ultra-violet absorbers, and stabilizers in plastics formulations by thin-layer chromatography. *Analyst (London)* **96**(1144), 515-21.
  16. DURISINOVA, L. and BELLUS, D. (1968). Thin-layer chromatography of 2-hydroxybenzophenones. *J. Chromatogr.* **32**(3), 584-7.
  17. MAZUR, H. and LEWANDOWSKA, I. (1976). Study of the migration of benzophenone derivative UV (light) stabilizers. *Rocz. Panstw. Zakl. Hig.* **27**, 611-9.
  18. DOBIES, R.S. (1968). Thin-layer chromatographic method for determining ultraviolet absorbers in paraffin wax. *J. Chromatogr.* **35**(3), 370-5.\*
  19. SU, H.C. and CAMERON, J.L. (1967). Gas-chromatographic method for evaluation of ultraviolet absorbers in polymeric materials. *Anal. Chem.* **39**(8), 949-53.
  20. POELMANS, M. (1968). Analysis of rigid poly(vinyl chloride) compounds. *Ind. Chim. Belge* **33**, 36-9.
  21. MIKHAILOVA, N.N. and VOROZHEEVA, V.P. (1964). Determination of derivatives of hydroxybenzophenone by paper chromatography. *Zavodsk. Lab.* **30**(7), 802-3.
  22. HRDLOVIC, P., SCHUBERTOVA, N., and PAVLOCIK, R. (1971). Substituent effects on chemical shift of hydroxyl group in 2-hydroxybenzophenone derivatives. *Collect. Czech. Chem. Commun.* **36**(5), 1942-7.
  23. GEORGE, W.O., HASSID, D.V., and PHILLIPS, J. (1971). Mass spectra of chloro-substituted benzophenones. *Org. Mass Spectrum* **5**, 605-13.
  24. CARRICK, A. and PAISLEY, H.M. (1974). Metastable peaks in a mass spectrum measured automatically under high resolution fast scan conditions. *Org. Mass Spectrum* **8**, 229-34.
  25. KRENMAYR, P., HELLER, R., and VARMUZA, K. (1974). Mass spectrometric investigation of benzophenone and substituted benzophenone. I. Determination of thermodynamic data. *Org. Mass. Spectrum* **9**, 998-1005.
  26. KIRKBRIGHT, G.F., NARAYANASWAMY, R., and WEST, T.S. (1970). Fluorescence and phosphorescence characteristics of some antioxidants and ultraviolet absorbers. *Anal. Chim. Acta* **52**(2), 237-46.
  27. MERRILL, J.R. (1961). Measurement of intramolecular hydrogen bonding by nuclear magnetic resonance and infrared spectroscopy. *J. Phys. Chem.* **65**, 2023-6.
  28. CTFA. (1978). Submission of data. Assay of Benzophenones (Draft).\*
  29. CTFA. (1981). Submission of data. Supplementary IR Spectra and chemical property data.\*
  30. STEPHEN, H. (1920). A new method for the preparation of 2,4-dihydroxy- and 2,4,4'-trihydroxybenzophenone and some observations relating to the Hoesch reaction. *J. Soc. Cosmet. Chem.* **117**, 1529-34.
  31. ZILBERMAN, E.N. and RYBAKOVA, N.A. (1964). New catalysts of the Hoesch reaction. *Kinetika i. Kataliz.* **5**(3), 538-40.
  32. SHAW, R.C. and MEHTA, P. (1936). A new and convenient synthesis of 2,4-dihydroxybenzophenone. *J. Ind. Chem. Soc.* **13**, 368-71.
  33. HEAD, F.S.H. (1969). Derivatives of 2,4-dihydroxybenzophenone. *J. Soc. Cosmet. Chem.* **1**, 34-7.
  34. DAIVI, V.J. and JADHAV, G.V. (1957). Derivatives of 2,4-dihydroxy-butyrophenone (resbutyrophenone) and 2,4-dihydroxybenzophenone (resbenzophenone). *J. Univ. Bombay* **25A**(3), 19-22.
  35. FERTIG, J., GOLDBERG, A.I., and SKOULTCHI, M. (1966). Ultraviolet-stabilizing monomers and polymers. II. Synthesis and polymerization of acrylate and metacrylated derivatives of 2,4-dihydroxybenzophenone. *J. Appl. Polymer Sci.* **10**(4), 663-72.
  36. WATANABE, H. and KUNIZO, K. (1957). Reactivity of aromatic compounds with diphenylpicrylhydrazyl. *Kogyo. Kagako. Zasshi.* **60**, 1476-9.
  37. VAN ALLEN, J. and TINKER, J. (1956). Derivatives of Benzoylresorcinol. *J. Org. Chem.* **19**, 1243.
  38. PARRISH, J.A., PATHAK, M.A., and FITZPATRICK, T.B. (1972). Protection of skin from germicidal ultraviolet radiation in the operating room by topical chemicals. *N. Eng. J. Med.* **284**(22), 1257-8.
  39. CTFA. (1979). Submission of data. Unpublished data, Appendix 7a.\*
  40. CTFA. (Dec. 1979). Submission of data. Unpublished data, Appendix 7h.\*
  41. WEAST, R.C. (ed.). (1978). *Handbook of Chemistry and Physics*, 59th ed. Palm Beach, FL: CRC Press.

42. TEMCHIM, Y.I., BURMISTROV, E.F., et al. (1970). Volatility of stabilizers and their compatibility with polymers. *Vysokomol Soedin., Ser. A* **12**(8), 1901-8.
43. AMERICAN CYANAMID CO. (ACC). (1979). Submission of data by CTFA. Unpublished data, Chemistry Supplement.\*
44. FAND, I. (1972). The protective effect of a sunscreen upon the lysosomes of ultra-violet-irradiated skin. *Dermatologica* **144**(4), 237-47.
45. FORBES, Jr., M.A., BRANNEN, M., and KING, C. (1966). Benzophenone as a sunscreen. *South Med. J.* **59**(3), 321-4.
46. VAN ALLEN, J.A. (1958). Derivatives of benzoylresorcinol. *J. Org. Chem.* **23**, 1679-82.
47. PINKUS, A.G. and MENG, L.Y.C. (1966). Reaction of 5-chloro-2-hydroxybenzophenone and phosphorus pentachloride. Structural studies. *J. Org. Chem.* **31**(4), 1038-42.
48. ARMSTRONG, L. (1977). Nitrogen-oxygen donor macrocyclic liands. I. Cobalt (II) complexes of cyclic diimino ligands derived from salicylaldehyde and 5-chloro-2-hydroxybenzophenone. *Inorg. Chem.* **16**(7), 1665-9.
49. ACC. (April 1957). Submission of data by CTFA. Unpublished data on Benzophenones, Appendix 2h.\*
50. KLIGMAN, A.M. (Feb. 1976). Submission of data by CTFA. Unpublished data on Benzophenone, Appendices 2d, 2g, 2i.\*
51. ISMAIL, R.M. (1970). Organosilicon compounds. XV. Preparation and ultraviolet absorption of silicon esters and metal-containing benzophenone derivatives. *Z. Naturforsch. B.* **25**(1), 14-8.
52. ACC. (1975). Submission of data by CTFA. Unpublished data, Appendix 2g.\*
53. TEMCHIM, Y.I., BURMISTROV, E.F., and ZALEVSKII, V.V. (1967). Volatility of stabilizers of polymers. *Plast. Massy* **3**, 72-4.
54. SIGNORE, A. and WOODWARD, F.E. (1958). Ultraviolet light absorbers in cosmetics. *J. Soc. Cosmet. Chem.* **9**, 358-68.
55. SMITH, E.B., DICKSON, J.E., and KNOX, J.M. (1973). Protection from sunlight: evaluation of a new screening agent. *South. Med. J.* **66**(2), 278-80.
56. TOROSIAN, G. and LEMBERGER, M.A. (1972). OTC sunscreen and suntan products. *J. Am. Pharm. Assoc.* **12**(11), 571-5.
57. MACLEOD, T.M. and FRAIN-BELL, W. (1975). A study of chemical light screening agents. *Br. J. Dermatol.* **92**(4), 417-25.
58. DUNITRIV, R. and HARAP, E. (1967). Photoprotective action of a Benzophenone derivative. *Derm. Vener.* **12**(5), 435-42.
59. WOLSKA, H., LANGNER, A., and MARZULLI, F.N. (1974). Hairless mouse as an experimental model for evaluating the effectiveness of sunscreen preparations. *J. Soc. Cosmet. Chem.* **25**(12), 639-44.
60. CRIPPS, D.J. and HEGEDUS, S. (Feb. 1974). Protection factor of sunscreens to monochromatic radiation. *Arch. Dermatol.* **109**(2), 202-4.
61. LACHMAN, L., URBANYI, T., WEINSTEIN, S., et al. (1962). Color stability of table formulations. V. Effect of ultraviolet absorbers on the photostability of colored tablets. *J. Pharm. Sci.* **51**, 321-6.
62. WILSON, W.W., QUERO, R., and MASTER, K.J. (1966). The search for a practical sunscreen. *South Med. J.* **59**(12), 1425-30.
63. WILLIS, I. and KLIGMAN, A.M. (1969). Evaluation of sunscreens by human assay. *J. Soc. Cosmet. Chem.* **20**(10), 639-51.
64. KOEHLER, F.T. and LEGATO, G.J. (1970). Benzophenone/resin copolymer for UV-absorbing hair fixatives. *Deterg. Spec.* **7**, 48, 50, 56.
65. THOMAS, Jr., W.G. (1966). Protection of cosmetic colors by means of UV absorbers. *J. Soc. Cosmet. Chem.* **17**(9), 553-70.
66. RUSSO, M. and ROSA, V.L. (1971). Effects of ultraviolet rays on coloring agents in cosmetics. *Riv. Ital. Essenze, Profuni, Piante Offic. Aromi, Saponi, Cosmet. Aerosol.* **53**, 333-9.
67. FOOD AND DRUG ADMINISTRATION (FDA). (Aug. 1976). Cosmetic product formulation data. Computer printout.
68. CTFA. (June 1980). Submission of data. Summary of unpublished data on Benzophenones.\*
69. FDA. (Aug. 25, 1978). Report on Sunscreen Drug Products for Over-the-Counter Human Drugs. 32 Fed. Reg. 412.
70. PARRISH, J., PATHAK, M., and FITZPATRICK, T. (1971). Prevention of unintentional overexposure in topical psoralen treatment of vitiligo. *Arch. Dermatol.* **104**(3), 281-3.
71. KORENYI, C. (1969). The effect of Benzophenone sunscreen lotion on chlorpromazine-treated patients. *Am. J. Psychiat.* **7**, 971-4.

72. OLENIACZ, W.S., SINGER, E.J., DOYLE, A.B., and VINSON, L. (1968). Induction of photohemolysis by tetra chlorosalicylanilide. *J. Pharm. Sci.* **57**(12), 2136-9.
73. FDA. (1979). Cosmetic product formulation data. Computer printout.
74. EMMETT, E.A., TAPHORN, B.R., and KOMINSKY, J.R. (1977). Phototoxicity occurring during the manufacture of ultraviolet-cured ink. *Arch. Dermatol.* **113**(6), 770-5.
75. MIZAMI, R.M. and BABOO, M.T. (1974). Office management of patients with urticaria: an analysis of 215 patients. *Ann. Allergy* **33**(2), 78-85.
76. FDA. (Jan. 1967). Report on Food Additives. Antioxidants and/or stabilizers for polymers. 32 Fed. Reg. 412.
77. FDA. (June 18, 1968). Report on Food Additives. Petroleum Wax. 33 Fed. Reg. 8817.
78. NICKERSON, P.R. and BARBEHENN, K.R. (1975). Organochlorine residues in starlings-1972. *Pestic. Monit. J.* **8**(4), 247-54.
79. MORRIS, O.N. and MOORE, A. (1975). Studies on the protection of insect pathogens from sunlight inactivation. *Chem. Control Res. Inst.* **113**, 34.
80. BAUR, J. and BOUEY, R. (1974). Ultraviolet and volatility loss of herbicides. *Arch. Environ. Contam. Toxicol.* **2**(3), 275-88.
81. KABIVANOV, V., PENEVA, A., KHADZHIDOCHEVA, S., et al. (1965). Light aging and stabilization of plasticized poly(vinyl chloride) suspension. *Polim. Sb. Tr. Nauchnoizsled. Inst. Kauch. Plastmasova Prom.* **2**, 55-76.
82. QUACKENBOS, H.M. and SAMUELS, H. (1967). Weatherability of plastics. Practical problems of predicting weathering performance. *Mod. Plast.* **44**(8), 143.
83. MULIN, Y.A., YAKOVIEV, A.D., and SHESHUKOV, A.V. (1967). Effect of stabilizers on properties of polypropylene coatings. *Plast. Massy* **2**, 10-1.
84. BROWN, A.R. (1960). Damage by sunlight. *Chem. Prod.* **23**, 270, 272.
85. MARCINCIN, A. and PIKLER, A. (1968). Compatibility of light stabilizers with polypropylene. II. Significance of the surface energy values. *Plast. Hmoty. Kauc.* **5**(6), 166-8.
86. UHDE, W.J. and WOGGON, H. (1976). New results from migration behavior of Benzophenone-based UV absorbers from polyolefins in foods. *Nahrung* **20**(2), 185-94.
87. NOVIKOVA, I. (1968). Light stabilization of poly(ethylene terephthalate) films. *Geliotekhnika* **4**, 53-5.
88. NOVIKOVA, I., VIRNIK, A., and ROQOVIN, Z. (1969). Effect of different light stabilizers on a poly(ethylene terephthalate) film. *Geliotekhnika* **5**, 40-3.
89. CHRZCZONOWICZ, S. and HIPPE, Z. (1966). Selection of effective sensitizers for photo-induced cross-linking of poly(vinyl butyral). *Bull. Acad. Pol. Sci., Ser. Sci. Chim.* **14**(9), 627-30.
90. POPOVA, Z.V., YANOVSKII, D.M., ZIL'BERMAN, E.N., et al. (1961). Effect of some phenols on the thermal and light decomposition of poly(vinyl chloride). *Zhur. Priklad. Khim.* **34**, 874-81.
91. GIESEN, M. (1959). The effect of ultraviolet rays and their absorption by ultraviolet absorbers in synthetic resins and dyes. *Farbenchemiker* **61**(12), 13-9.
92. HAWLEY, G.G. (ed.). (1971). *The Condensed Chemical Dictionary*, 8th ed. New York, NY: Van Nostrand Reinhold Co.
93. FINNEGAN, R.A., MERKEL, K.E., and PATEL, J.K. (1973). Constituents of *Mammea americana* L. XII. Biological data for xanthenes and Benzophenones. *J. Pharm. Sci.* **62**(3), 483-5.
94. PATEL, Y.M., LEVINSKAS, G.J., and SHAFFER, C.B. (1968). Toxicity and metabolism of 2-hydroxy-4-n-octoxybenzophenone. *Food Cosmet. Toxicol.* **6**(2), 199-208.
95. HAZELTON LABS. (Nov. 1953). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 2a.\*
96. ACC. (April 1959). Submission of data by CTFA. Unpublished data, Appendix 2e, 192f.\*
97. HOMROWSKI, S. (1968). Studies on the toxicity of additives applied in the domestic production of plastics. 3. Acute and subacute toxicity of some Benzophenone derivatives. *Rocz. Panstw. Zakl. Hig.* **19**(2), 179-87.
98. LEWERENZ, H.J., LEWERENZ, G., and PLASS, R. (1972). Acute and subacute toxicity studies of the UV absorber MOB in rats. *Food Cosmet. Toxicol.* **10**(1), 41-50.
99. INDUSTRIAL BIOLOGY AND RESEARCH TESTING LABS (IBRTL). (June 1960). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 1a.\*
100. INDUSTRIAL BIOLOGY LABS (IBL). (July 1964). Submission of data by CTFA. Unpublished data, Appendix 1i.\*
101. HAZELTON LABS. (Oct. 1953). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 2b.\*

102. IBL. (April 30, 1962). Submission of data by CTFA. Unpublished data, Appendix 1m.\*
103. INDUSTRIAL TOXICOLOGY LABS (ITL). (Jan. 1955). Submission of data by CTFA. Unpublished data, Appendix 1s.\*
104. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1p.\*
105. IBL. (Aug. 1964). Submission of data by CTFA. Unpublished data, Appendix 1e.\*
106. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1k.\*
107. IBL. (April 1967). Submission of data by CTFA. Unpublished data, Appendix 1h.\*
108. ACC. (1976). Submission of data by CTFA. Unpublished data, Appendix 2c.\*
109. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1o.\*
110. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1f.\*
111. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1j.\*
112. IBL. (Oct. 1965). Submission of data by CTFA. Unpublished data, Appendix 1r.\*
113. CTFA. (Feb. 1980). Submission of data. Unpublished data, Appendix 7f.\*
114. MARZULLI, F.N. and MAIBACH, H.I. (1975). The rabbit as a model for evaluating skin irritants: A comparison of results obtained on animals and man using repeated skin exposures. *Food Cosmet. Toxicol.* **13**(5), 533-40.
115. IBL. (July 1964). Submission of data by CTFA. Unpublished data, Appendix 1b.\*
116. IBL. (April 1962). Submission of data by CTFA. Unpublished data, Appendix 1n.\*
117. AVON PRODUCTS. (Feb. 1979). Submission of data by CTFA. Unpublished data on Benzophenones, Appendix 4a.\*
118. CTFA. (1980). Submission of data. Supplementary mutagenesis data.\*
119. DEPT. OF HEALTH, EDUCATION AND WELFARE (DHEW). (May 1978). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 5b.\*
120. DHEW. (Feb. 1979). Submission of data by CTFA. Unpublished data, Appendix 5c.\*
121. HILL TOP RESEARCH LABS. (June 1979). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 3a.\*
122. HILL TOP RESEARCH LABS. (Sept. 1979). Submission of data by CTFA. Unpublished data, Appendix 3b.\*
123. LITTON BIONETICS. (1979). Submission of data by CTFA. Supplementary mutagenesis data.\*
124. IBRTL. (Aug. 1957). Submission of data by CTFA. Unpublished data, Appendix 1g.\*
125. FOOD AND DRUG RESEARCH LABS (FDRL). (Nov. 1978). Submission of data by CTFA. Unpublished data on Benzophenones, Appendix 7e and supplement.\*
126. ITL. (Aug. 1952). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 1c.\*
127. IBL. (May 1962). Submission of data by CTFA. Unpublished data, Appendix 1l.\*
128. ITL. (Jan. 1954). Submission of data by CTFA. Unpublished data, Appendix 1u.\*
129. FISHER, A. (Aug. 1980). Correspondence with CIR.\*
130. PARISER, R.J. (1977). Contact dermatitis to dioxybenzone. *Contact Derm.* **3**(3), 172.
131. RAMSEY, D.L., COHEN, H.J., and BAER, R.L. (1972). Allergic reaction to Benzophenone. Simultaneous occurrence of urticarial and contact sensitivities. *Arch. Dermatol.* **105**(6), 906-8.
132. THOMPSON, G., MAIBACH, H., and EPSTEIN, J. (1977). Allergic contact dermatitis from sunscreen preparations complicating photodermatitis. *Arch. Dermatol.* **113**(9), 1252-3.
133. LEBERCO LABS. (July 1979). Submission of data by CTFA. Unpublished data, Appendix 7g.\*
134. HILL TOP RESEARCH LABS. (1974). Submission of data by CTFA. Unpublished data, Supplement.\*
135. TESTKIT LABS. (1980). Submission of data by CTFA. Unpublished data on Benzophenones, Supplement.\*
136. HILL TOP RESEARCH LABS. (1978). Submission of data by CTFA. Unpublished data, Supplement.\*
137. KATZ, S. (1970). Relative effectiveness of selected sunscreens. *Arch. Dermatol.* **101**(5), 466-8.
138. BELISARIO, J.C. (1961). Uvistat as a sunscreen agent. *Med. J. Aust.* **48**(2), 178-9.
139. GARCIA, R.L. and DAVIS, C.M. (1973). PABA. A more effective sunscreen. *Mil. Med.* **138**, 331-3.
140. ABBOTT, L.G., DEAKIN, M.J., et al. (1970). Clinical trial of two suncreening creams. *Med. J. Aust.* **1**(22), 1094-5.

JOURNAL OF THE AMERICAN COLLEGE OF TOXICOLOGY  
Volume 2, Number 5, 1983  
Mary Ann Liebert, Inc., Publishers

### 3

# Addendum to the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11 to Include Benzophenones-2, -6, and -8

## INTRODUCTION

The Cosmetic Ingredient Review (CIR) Expert Panel initially reviewed the safety of Benzophenones-1, -2, -3, -4, -5, -6, -8, -9, and -11 and concluded that there were insufficient data to evaluate the mutagenic potential of Benzophenones-2, -6, and -8. All other test data needed for the safety evaluation of these three ingredients were considered adequate. The Expert Panel released the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11 (December 18, 1981) stating that these ingredients were safe as used in cosmetic products. As required by the CIR Procedures, a Notice of Insufficient Data Report on Benzophenones-2, -6, and -8 was issued (November 25, 1981), and it indicated that additional mutagenesis data would be required before a safety evaluation could be made on these three ingredients.

This Addendum contains the additional data supplied by industry in response to the Expert Panel's request. The mutagenesis data initially available to the Expert Panel and included in the Final Report have been extracted and reported here for convenience in reviewing this Addendum.

Chemical, biological, toxicological, and clinical data for Benzophenones-2, -6, and -8 can be found in the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11.

## SHORT-TERM TESTS

### Data from the Final Report

The mutagenicity of Benzophenones-2, -6, and -8 was investigated with the Ames *Salmonella*/mammalian-microsomal assay. *Salmonella typhimurium* strains TA98, TA100, TA1535, TA1537, and TA1538 were used; all tests were performed

in the presence and absence of Aroclor-induced rat liver microsomal S-9 cell fraction to observe the mutagenic effect of each compound following metabolic activation. Preliminary cytotoxicity studies determined the dose range of each compound to be used. Benzophenones-2, -6, and -8 were nonmutagenic when assayed directly and were mutagenic with metabolic activation in *Salmonella* strain TA1537. Benzophenone-8 was weakly mutagenic in *Salmonella* strain TA1537, whereas Benzophenone-6 was determined to be mutagenic at three doses in the same strain. Benzophenone-2, in the presence of rat liver microsomes, induced a "small but fairly consistent increase in the number of mutants" in four *Salmonella* strains tested. At doses of 100–300  $\mu\text{g}$ , Benzophenone-2 induced mutant increases of 50%–100% in TA100 and 200%–500% in TA1537. A mutant increase of 50% was observed in strains TA98 and TA1535, but these strains had not been tested enough times to provide conclusive results. The investigator suggested that "the small and somewhat erratic nature of the (mutagenic) response we have seen raises the possibility that the observed effect may be due to the presence of an impurity." The purity of the test sample was 99%, (lab-grade) and was assumed to be purer than that of the cosmetic-grade. Additional tests using lab-grade Benzophenone-2 found this ingredient to be mutagenic in TA1537 at doses of 200 and 750  $\mu\text{g}$  when activated by Aroclor-induced hamster liver enzymes. Preliminary assays of cosmetic-grade Benzophenone-2 revealed mutagenic activity not differing significantly from that of the purer lab-grade.<sup>(1-5)</sup>

Benzophenone-2 was reported to be positive for strains TA98, TA100, TA1535, and TA1537 with S-9 metabolic activation in Table 9 of the Final Report based on textual comments on the unpublished data submitted by industry to CIR for that report. The interpretation of these data, which have since been published, was clarified by the investigators who reported that Benzophenone-2 is "clearly mutagenic" only in strain TA1537.<sup>(3)</sup> It was suggested that this may indicate that Benzophenone-2 causes frameshift mutations by intercalating between DNA bases without covalent bonding, and that caution should be taken in extrapolating from mutagenicity to carcinogenicity of such agents in the Ames test. An amended Table 9, Table 9A, is included in this Addendum.

An in vitro cytogenic assay was used to evaluate the ability of Benzophenone-2 to induce sister chromatid exchange (SCE) and chromosome aberrations (CA) in L5178Y mouse lymphoma cells. Assays were performed in the presence and absence of Aroclor-induced rat liver microsomal enzymes (S-9). The solubility of Benzophenone-2 in DMSO and its cytotoxicity were first determined. For the mutagenesis assays, doses of 6.250–200.00  $\mu\text{g}$  Benzophenone-2 per plate were used. When assayed in the absence of S-9, Benzophenone-2 induced small, "biologically insignificant" increases in SCE frequency at 100 and 200  $\mu\text{g}$ ; CA frequencies were not elevated at any dose. With metabolic activation, however, Benzophenone-2 produced "statistically and biologically significant" increases in SCE frequency at the three highest dose levels indicating a dose-response relationship. The author noted that Benzophenone-2 was more toxic to cells with the activation system; only 17 scorable cells were found at the 100  $\mu\text{g}$  dose. The investigator reported that ten CAs (including a quadriradial, a translocation, and two triradials) were observed among the 67 cells scored at the two highest doses with activation. He concluded that Benzophenone-2 does not directly induce

## ADDENDUM, ASSESSMENT: BENZOPHENONES-2, -6, and -8

81

TABLE 9A. Ames Salmonella Mutagenesis Assay.

Benzophenone	Dose range ( $\mu$ g) (solvent)	Results <sup>a</sup> without S-9 metabolic activation					Results <sup>a</sup> with S-9 metabolic activation					Comment	Ref.	
		TA98	TA100	TA1535	TA1537	TA1538	TA98	TA100	TA1535	TA1537	TA1538			
-1	0.1-500 Dimethyl sulfoxide (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	1
-2	0.1-10,000 (DMSO)	(-)	(-)	(-)	(-)	- <sup>b</sup>	(-)	(-)	(-)	(-)	(+)	(-)	Clearly mutagenic only in TA1537 with S-9 activation	2,3,6
-2	10-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	4
-3	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	1
-4	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	1
-6	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(+)	(-)	Mutagenic only in TA1537 with S-9 activation at 10 and 100 $\mu$ g. Toxic to TA1537 at 500 and 1000 $\mu$ g with S-9	1
-8	7.0-700 (ETOH)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(+)	(-)	Dose-dependent, weak but significant mutage- nicity in TA1537 with S-9 activation only	1
-9	1.0-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	1
-11	10-1000 (DMSO)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	Nonmutagenic with and without S-9 activation	5

<sup>a</sup>(-) = nonmutagenic; (+) = mutagenic.<sup>b</sup>No data.



significant SCE or CA increases but does, under metabolic activation, induce these changes.<sup>(7)</sup>

A mouse lymphoma forward mutation assay was used to test Benzophenones-2 and -8 for mutagenesis. The L5178Y TK+/- cell line was used; assays were performed in the presence and absence of an Aroclor-induced rat liver microsomal preparation (S-9). Materials were dissolved in DMSO and tested for preliminary cytotoxicity to determine doses to be used in the assays. Without activation, Benzophenone-2 was mutagenic at "highly toxic" doses. In the presence of S-9, Benzophenone-2 became more toxic. An increase in the mutant frequency (3.0-6.8 times) was observed with the three most toxic doses. A dose-response relationship was not demonstrated. The investigator suggested that Benzophenone-2 "appears to react with microsomal system to yield a mutagenic product that induces mutants at lower applied concentrations and toxicities than under nonactivation conditions." It was concluded that Benzophenone-2 induced an increase in mutations at the TK locus in L5178Y mouse lymphoma cells only for highly toxic doses with or without metabolic activation and that this material is weakly mutagenic under the conditions of the test.<sup>(7)</sup> These findings need to be reconfirmed since there was no dose response pattern of toxicities over the preferred relative growth range in any of the trials; increases in mutant frequency in the assays occurred only at levels bordering total lethality; and the lethal dose was poorly reproduced from one trial to another with metabolic activation. When assayed directly, Benzophenone-8 did not induce mutant frequencies significantly greater than those of controls. With metabolic activation, however, Benzophenone-8 induced dose-dependent mutant frequency increases of 3.8 and 2.0 times for the two highest doses (24 and 32 µg, respectively). The investigator concluded that, under the test conditions, Benzophenone-8 is non-mutagenic when assayed directly, but under metabolic activation it induces a significant, dose-dependent increase in mutant frequency.<sup>(11)</sup>

### New Data

The gradient plate test of McMahon et al.,<sup>(8)</sup> a modification of the Ames test, was used to investigate the effects of Benzophenone-2 and -6 on bacterial mutation.<sup>(9,10)</sup> The chemicals were dissolved in DMSO and tested at concentrations of 0.1-1000 µg/ml with and without rat liver S-9 metabolic activation. Benzophenones-2 and -6 were tested with *Salmonella typhimurium* strains G46, TA1535, TA100, C3076, TA1537, D3052, TA1538, and TA98 (histidine auxotrophs) and *Escherichia coli* strains WP2 and WP2 uvrA-(tryptophan auxotrophs). Benzophenone-2 inhibited the growth of all the bacterial strains but did not induce mutations with or without metabolic activation. Benzophenone-6 did not inhibit bacterial growth and did not produce mutations in any of the bacterial strains with or without metabolic activation.

The induction of unscheduled DNA synthesis (repair synthesis) in primary cultures of adult rat hepatocytes was studied after exposure of the cultures to Benzophenones-2 and -6 dissolved in DMSO and at concentrations of 0.5-1000 nmoles/ml.<sup>(11,12)</sup> Cytotoxicity was observed at the 500 and 100 nmoles/ml con-

centrations of both chemicals. Benzophenones-2 and -6 did not induce DNA repair synthesis.

Female Chinese hamsters were orally administered 62.5–500 mg/kg Benzophenones-2 and -6 in a 10% aqueous acacia solution.<sup>(13,14)</sup> The animals were sacrificed, and the frequency of bone marrow SCE exchange was determined. Benzophenones-2 and -6 did not induce SCE in vivo in the bone marrow of Chinese hamsters. Cytotoxicity was not observed with either chemical.

The effect of Benzophenone-8 on SCE in Chinese hamster ovary cells was studied with and without rat liver S-9 metabolic activation.<sup>(15)</sup> The chemical was tested at concentrations of 333 ng/ml to 1 mg/ml in DMSO. Without metabolic activation, concentrations of 100–1000  $\mu\text{g/ml}$  Benzophenone-8 were almost completely lethal to the cells, there was a reduction in monolayer confluency at 10 and 33  $\mu\text{g/ml}$ , and concentrations of 1  $\mu\text{g/ml}$  and greater caused cell cycle delays. There was no significant increase in SCE without metabolic activation at concentrations of 333 ng/ml to 10  $\mu\text{g/ml}$  except for a slight increase at 10  $\mu\text{g/ml}$ . With no evidence of a positive dose relationship, this small increase at a toxic dose was not thought to be meaningful by the investigators. With metabolic activation, Benzophenone-8 was extremely cytotoxic at concentrations of 100–1000  $\mu\text{g/ml}$ , and there was some growth reduction at concentrations of 25–50  $\mu\text{g/ml}$ . No cell cycle delay was noted. There was no increase in SCE at concentrations of 3.1–50  $\mu\text{g/ml}$  Benzophenone-8 with metabolic activation.

Benzophenone-8 was tested in a mammalian cell forward gene mutation assay with and without an S-9 metabolic activation system.<sup>(16)</sup> The assay measured the ability of a chemical to induce mutations at the hypoxanthine-guanine phosphoribosyl transferase locus in Chinese hamster ovary cells. Benzophenone-8 was dissolved in DMSO and tested at concentrations of 33 ng/ml to 1 mg/ml. No cells survived concentrations of 100–1000  $\mu\text{g/ml}$  Benzophenone-8 without metabolic activation or concentrations of 333.3–1000  $\mu\text{g/ml}$  with metabolic activation. At a concentration of 100  $\mu\text{g/ml}$  with metabolic activation, 9.3% of the cells survived. At all concentrations from 33 ng/ml to 33.3  $\mu\text{g/ml}$ , there was greater than 58% survival with or without metabolic activation. Mutations were not observed at Benzophenone-8 concentrations of 2.2–66.6  $\mu\text{g/ml}$  with or without metabolic activation.

Benzophenone-8 in corn oil was administered by gavage to mice, and its effect was investigated with a micronucleus test.<sup>(17)</sup> Micronuclei result from chromosome breakage. In a preliminary dose range study, groups of two male and two female mice received 50–5000 mg/kg Benzophenone-8 daily for two days, were observed for 48 further hours, and were sacrificed. No toxic signs or deaths were observed after the 50 mg/kg doses. Signs of toxicity including decreased activity, piloerection, and exophthalmus were observed at doses of 166–5000 mg/kg. At doses of 1666.6 and 5000 mg/kg, abnormal gait was also observed, and there was one death in each of these groups. A dose of 1500 mg/kg Benzophenone-8 was selected for the micronucleus assay. Two groups of eight mice received one dose of Benzophenone-8, and two groups of eight mice received two doses of Benzophenone-8 separated by 24 hours. Body drop, decreased activity, and abnormal gait were observed in all four groups. Benzophenone-8 did not

significantly increase the number of bone marrow micronuclei and was not cytotoxic.

## CONCLUSION

The Panel concludes that Benzophenones-2, -6, and -8 are not mutagenic or genotoxic and that the conclusion for the Final Report on the Safety Assessment of Benzophenones-1, -3, -4, -5, -9, and -11, which states "On the basis of the available animal and clinical human experience presented in this report, the Panel concludes that Benzophenones-1, -3, -4, -5, -9, and -11 are safe for topical application to humans in the present practices of use and concentration in cosmetics" is also applicable to these three ingredients.

## REFERENCES

1. COSMETIC, TOILETRY, AND FRAGRANCE ASSOCIATION (CTFA). (1980c). Submission of data by CTFA. Supplementary mutagenesis data.\*
2. DEPARTMENT OF HEALTH, EDUCATION AND WELFARE (DHEW). (May 1978). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 5b.\*
3. DHEW. (Feb. 1979). Submission of data by CTFA. Unpublished data, Appendix 5c.\*
4. HILL TOP RESEARCH LABS. (June 1979a). Submission of data by CTFA. Unpublished data on Benzophenone, Appendix 3a.\*
5. HILL TOP RESEARCH LABS. (Sept. 1979b). Submission of data by CTFA. Unpublished data, Appendix 3b.\*
6. PRIVAL, M.J., SHELDON, A.T., Jr., and POPKIN, D. (1982). Evaluation, using *Salmonella typhimurium*, of the mutagenicity of seven chemicals found in cosmetics. *Food Chem. Toxicol.* **20**, 427-32.
7. LITTON BIONETICS. (1979). Submission of data by CTFA. Supplementary mutagenesis data.\*
8. McMAHON, R.E., CLINE, J.C., and THOMPSON, C.Z. (1979). Assay of 855 test chemicals in ten tester strains using a new modification of the Ames test for bacterial mutagens. *Cancer Res.* **39**, 682-93.
9. LILLY RESEARCH LABS. (May 1982a). Submission of data by CTFA. The effect of benzophenone-2 on the induction of bacterial mutation using a modification of the Ames test, Study 820510GPA1876.\*
10. LILLY RESEARCH LABS. (May 1982b). Submission of data by CTFA. The effect of benzophenone-6 on the induction of bacterial mutation using a modification of the Ames test, Study 820510GPA1877.\*
11. LILLY RESEARCH LABS. (June 1982c). Submission of data by CTFA. The effect of benzophenone-2 on the induction of DNA repair synthesis in primary cultures of adult rat hepatocytes, Study 820511UDS1876.\*
12. LILLY RESEARCH LABS. (June 1982d). Submission of data by CTFA. The effect of benzophenone-6 on the induction of DNA repair synthesis in primary cultures of adult rat hepatocytes, Study 820511UDS1877.\*
13. LILLY RESEARCH LABS. (May 1982e). Submission of data by CTFA. The effect of benzophenone-2 on the *in vivo* induction of sister chromatid exchange in bone marrow of Chinese hamsters, Study 820504SCE1876.\*
14. LILLY RESEARCH LABS. (May 1982f). Submission of data by CTFA. The effect of benzophenone-6 on the *in vivo* induction of sister chromatid exchange in bone marrow of Chinese hamsters, Study 820510SCE1877.\*
15. LITTON BIONETICS. (Oct. 1981). Submission of data by CTFA. Mutagenicity evaluation of benzophenone-8 in the sister chromatid exchange assay with Chinese Hamster Ovary (CHO) cells final report.\*
16. PHARMAKON RESEARCH INTERNATIONAL. (Dec. 9, 1981a). Submission of data by CTFA. CHO/HGPRT mammalian cell forward gene mutation assay, PH314-AC-001-81, Benzophenone-8.\*
17. PHARMAKON RESEARCH INTERNATIONAL. (Oct. 30, 1981b). Submission of data by CTFA. Genetic toxicology micronucleus test (MNT), PH309A-AC-002-81, Benzophenone-8.\*

---

\*Available upon request: Administrator, Cosmetic Ingredient Review, Suite 810, 1110 Vermont Ave., N.W., Washington, DC 20005

**2020 and 2021 FDA VCRP Data****Benzophenone-1 - OLD (2020)**

Other Baby Products	01C	2
Bath Oils, Tablets, and Salts	02A	1
Cologne and Toilet waters	04A	33
Perfumes	04B	7
Other Fragrance Preparation	04E	2
Basecoats and Undercoats	08A	64
Nail Creams and Lotions	08C	5
Nail Extenders	08D	1
Nail Polish and Enamel	08E	411
Nail Polish and Enamel Removers	08F	26
Other Manicuring Preparations	08G	33
Aftershave Lotion	11A	6
Preshave Lotions (all types)	11D	1
Cleansing	12A	1
Body and Hand (exc shave)	12D	2
<b>Total</b>		<b>595</b>

**Benzophenone-1 - NEW (2021)**

Cologne and Toilet waters	04A	5
Perfumes	04B	1
Basecoats and Undercoats	08A	28
Nail Polish and Enamel	08E	110
Nail Polish and Enamel Removers	08F	2
Other Manicuring Preparations	08G	19
Aftershave Lotion	11A	2
Preshave Lotions (all types)	11D	1
<b>Total</b>		<b>168</b>

**Benzophenone-2 - OLD (2020)**

Bath Oils, Tablets, and Salts	02A	1
Cologne and Toilet waters	04A	60
Perfumes	04B	18
Other Fragrance Preparation	04E	3
Shampoos (non-coloring)	05F	1
Tonics, Dressings, and Other Hair Grooming Aids	05G	1
Bath Soaps and Detergents	10A	4
Deodorants (underarm)	10B	1
Aftershave Lotion	11A	6
Cleansing	12A	1
Body and Hand (exc shave)	12D	2
Moisturizing	12F	3
Paste Masks (mud packs)	12H	1
Other Skin Care Preps	12J	1
<b>Total</b>		<b>103</b>

**Benzophenone-2 - NEW (2021)**

Cologne and Toilet waters	04A	40
Perfumes	04B	4
Shampoos (non-coloring)	05F	1
Aftershave Lotion	11A	4
Cleansing	12A	1
Moisturizing	12F	3
Paste Masks (mud packs)	12H	1
Other Skin Care Preps	12J	1
<b>Total</b>		<b>55</b>

**Benzophenone-3 - OLD (2020)**

Other Baby Products	01C	1
Bath Oils, Tablets, and Salts	02A	3
Bubble Baths	02B	32
Other Bath Preparations	02D	1
Eye Lotion	03D	5
Cologne and Toilet waters	04A	222
Perfumes	04B	94
Other Fragrance Preparation	04E	68
Hair Conditioner	05A	23
Hair Spray (aerosol fixatives)	05B	6
Hair Straighteners	05C	5
Rinses (non-coloring)	05E	2
Shampoos (non-coloring)	05F	12
Tonics, Dressings, and Other Hair Grooming Aids	05G	7
Wave Sets	05H	2
Other Hair Preparations	05I	14
Hair Dyes and Colors (all types requiring caution statements and patch tests)	06A	5
Hair Shampoos (coloring)	06D	8
Other Hair Coloring Preparation	06H	1
Face Powders	07B	4
Foundations	07C	34
Lipstick	07E	101
Makeup Bases	07F	2
Makeup Fixatives	07H	1
Other Makeup Preparations	07I	36
Basecoats and Undercoats	08A	7
Cuticle Softeners	08B	2
Nail Creams and Lotions	08C	2
Nail Polish and Enamel	08E	21
Nail Polish and Enamel Removers	08F	10
Other Manicuring Preparations	08G	9
Bath Soaps and Detergents	10A	11
Deodorants (underarm)	10B	4
Feminine Deodorants	10D	4

Other Personal Cleanliness Products	10E	5
Aftershave Lotion	11A	16
Shaving Cream	11E	1
Cleansing	12A	15
Face and Neck (exc shave)	12C	49
Body and Hand (exc shave)	12D	25
Moisturizing	12F	58
Night	12G	3
Skin Fresheners	12I	2
Other Skin Care Preps	12J	16
Suntan Gels, Creams, and Liquids	13A	30
Indoor Tanning Preparations	13B	5
Other Suntan Preparations	13C	5
<b>Total</b>		<b>989</b>

### **Benzophenone-3 - NEW (2021)**

Bath Oils, Tablets, and Salts	02A	2
Bubble Baths	02B	4
Other Bath Preparations	02D	1
Eye Lotion	03D	1
Cologne and Toilet waters	04A	99
Perfumes	04B	49
Other Fragrance Preparation	04E	21
Hair Conditioner	05A	15
Hair Spray (aerosol fixatives)	05B	1
Hair Straighteners	05C	5
Rinses (non-coloring)	05E	1
Shampoos (non-coloring)	05F	7
Tonics, Dressings, and Other Hair Grooming Aids	05G	2
Other Hair Preparations	05I	5
Other Hair Coloring Preparation	06H	1
Face Powders	07B	3
Foundations	07C	9
Lipstick	07E	17
Makeup Bases	07F	1
Makeup Fixatives	07H	1
Basecoats and Undercoats	08A	1
Cuticle Softeners	08B	2
Nail Creams and Lotions	08C	1
Nail Polish and Enamel	08E	10
Nail Polish and Enamel Removers	08F	10
Other Manicuring Preparations	08G	2
Bath Soaps and Detergents	10A	1
Deodorants (underarm)	10B	2
Other Personal Cleanliness Products	10E	1
Aftershave Lotion	11A	10
Cleansing	12A	6

Face and Neck (exc shave)	12C	18
Body and Hand (exc shave)	12D	9
Moisturizing	12F	30
Night	12G	1
Other Skin Care Preps	12J	6
Suntan Gels, Creams, and Liquids	13A	17
Indoor Tanning Preparations	13B	2
Other Suntan Preparations	13C	2
<b>Total</b>		<b>376</b>

**Benzophenone-4 - OLD**

Other Baby Products	01C	2
Bath Oils, Tablets, and Salts	02A	7
Bubble Baths	02B	51
Other Bath Preparations	02D	14
Eye Lotion	03D	4
Eye Makeup Remover	03E	3
Other Eye Makeup Preparations	03G	3
Perfumes	04B	2
Other Fragrance Preparation	04E	6
Hair Conditioner	05A	85
Hair Spray (aerosol fixatives)	05B	70
Hair Straighteners	05C	3
Rinses (non-coloring)	05E	1
Shampoos (non-coloring)	05F	97
Tonics, Dressings, and Other Hair Grooming Aids	05G	150
Wave Sets	05H	9
Other Hair Preparations	05I	88
Hair Rinses (coloring)	06C	2
Hair Shampoos (coloring)	06D	6
Hair Color Sprays (aerosol)	06E	13
Other Hair Coloring Preparation	06H	18
Foundations	07C	3
Lipstick	07E	10
Other Makeup Preparations	07I	3
Cuticle Softeners	08B	2
Other Manicuring Preparations	08G	4
Bath Soaps and Detergents	10A	1010
Other Personal Cleanliness Products	10E	111
Aftershave Lotion	11A	7
Shaving Cream	11E	1
Shaving Soap	11F	2
Other Shaving Preparation Products	11G	3
Cleansing	12A	206
Face and Neck (exc shave)	12C	44
Body and Hand (exc shave)	12D	43
Moisturizing	12F	118

Night	12G	9
Paste Masks (mud packs)	12H	5
Skin Fresheners	12I	9
Other Skin Care Preps	12J	31
Indoor Tanning Preparations	13B	2
Other Suntan Preparations	13C	2
<b>Total</b>		<b>2259</b>

**Benzophenone-4 - NEW (2021)**

Bath Oils, Tablets, and Salts	02A	2
Bubble Baths	02B	24
Other Bath Preparations	02D	2
Eye Lotion	03D	2
Eye Makeup Remover	03E	3
Other Eye Makeup Preparations	03G	2
Other Fragrance Preparation	04E	1
Hair Conditioner	05A	30
Hair Spray (aerosol fixatives)	05B	31
Hair Straighteners	05C	1
Shampoos (non-coloring)	05F	39
Tonics, Dressings, and Other Hair Grooming Aids	05G	45
Wave Sets	05H	3
Other Hair Preparations	05I	42
Hair Rinses (coloring)	06C	1
Hair Shampoos (coloring)	06D	4
Hair Color Sprays (aerosol)	06E	8
Other Hair Coloring Preparation	06H	20
Foundations	07C	3
Lipstick	07E	10
Other Makeup Preparations	07I	2
Cuticle Softeners	08B	1
Other Manicuring Preparations	08G	2
Bath Soaps and Detergents	10A	595
Other Personal Cleanliness Products	10E	8
Aftershave Lotion	11A	3
Shaving Cream	11E	1
Other Shaving Preparation Products	11G	1
Cleansing	12A	239
Face and Neck (exc shave)	12C	20
Body and Hand (exc shave)	12D	13
Moisturizing	12F	40
Night	12G	4
Paste Masks (mud packs)	12H	3
Skin Fresheners	12I	7
Other Skin Care Preps	12J	12
Indoor Tanning Preparations	13B	1
Other Suntan Preparations	13C	1



<b>Total</b>		<b>1226</b>
--------------	--	-------------

**Benzophenone-5 - OLD (2020)**

Eye Makeup Remover	03E	1
Shampoos (non-coloring)	05F	1
Tonics, Dressings, and Other Hair Grooming Aids	05G	1
Makeup Bases	07F	2
Cleansing	12A	1
Face and Neck (exc shave)	12C	7
Moisturizing	12F	1
<b>Total</b>		<b>14</b>

**Benzophenone-5 (2021) - NEW**

Tonics, Dressings, and Other Hair Grooming Aids	05G	1
Aftershave Lotion	11A	1
Face and Neck (exc shave)	12C	3
Moisturizing	12F	5
<b>Total</b>		<b>10</b>

**Benzophenone-6 - No FDA Data****Benzophenone-7 - No FDA Data****Benzophenone-8 - No FDA Data****Benzophenone-9 - OLD (2020)**

Bubble Baths	02B	1
Cologne and Toilet waters	04A	6
Perfumes	04B	2
Other Fragrance Preparation	04E	5
Lipstick	07E	2
Nail Creams and Lotions	08C	1
Bath Soaps and Detergents	10A	21
Other Personal Cleanliness Products	10E	4
Aftershave Lotion	11A	1
Cleansing	12A	3
Face and Neck (exc shave)	12C	8
Body and Hand (exc shave)	12D	7
Moisturizing	12F	3
Night	12G	2
Paste Masks (mud packs)	12H	1
Other Skin Care Preps	12J	4
<b>Total</b>		<b>71</b>

**Benzophenone-9 (2021) - NEW**

Lipstick	07E	2
Bath Soaps and Detergents	10A	5

Aftershave Lotion	11A	1
Face and Neck (exc shave)	12C	4
Other Skin Care Preps	12J	1
<b>Total</b>		<b>13</b>

**Benzophenone-10 - No FDA Data****Benzophenone-11 - No FDA Data****Benzophenone-12 - No FDA Data****1983 FDA VCRP Data****Benzophenone-1**

Bath Oils, Tablets, and Salts	02A	1
Bubble Baths	02B	2
Cologne and Toilet waters	04A	3
Other Fragrance Preparation	04E	5
Shampoos (non-coloring)	05F	7
Tonics, Dressings, and Other Hair Grooming Aids	05G	2
Wave Sets	05H	4
Other Hair Preparations	05I	1
Blushers	07A	1
Lipstick	07E	7
Basecoats and Undercoats	08A	5
Nail Polish and Enamel	08E	87
Other Manicuring Preparations	08G	4
Aftershave Lotion	11A	6
Beard Softeners	11B	2
Body and Hand (exc shave)	12D	2
Moisturizing	12F	3
<b>Total</b>		<b>142</b>

**Benzophenone-2**

Bath Oils, Tablets, and Salts	02A	3
Bubble Baths	02B	5
Other Bath Preparations	02D	6
Cologne and Toilet waters	04A	120
Perfumes	04B	22
Sachets	04D	4
Other Fragrance Preparation	04E	15
Hair Conditioner	05A	2
Rinses (non-coloring)	05E	4
Shampoos (non-coloring)	05F	14
Tonics, Dressings, and Other Hair Grooming Aids	05G	2
Wave Sets	05H	3
Blushers	07A	3

Rouges	07G	1
Makeup Fixatives	07H	1
Other Makeup Preparations	07I	4
Feminine Deodorants	10D	1
Aftershave Lotion	11A	30
Preshave Lotions (all types)	11D	1
Cleansing	12A	6
Body and Hand (exc shave)	12D	7
Moisturizing	12F	8
Paste Masks (mud packs)	12H	1
Skin Fresheners	12I	27
Other Skin Care Preps	12J	7
Suntan Gels, Creams, and Liquids	13A	1
Other Suntan Preparations	13C	1
<b>Total</b>		<b>299</b>

**Benzophenone-3**

Bath Oils, Tablets, and Salts	02A	1
Cologne and Toilet waters	04A	1
Perfumes	04B	1
Shampoos (non-coloring)	05F	1
Other Makeup Preparations	07I	1
Nail Polish and Enamel	08E	36
Aftershave Lotion	11A	3
Cleansing	12A	2
Skin Fresheners	12I	1
<b>Total</b>		<b>47</b>

**Benzophenone-4**

Baby Shampoos	01A	2
Bath Oils, Tablets, and Salts	02A	11
Bubble Baths	02B	2
Other Bath Preparations	02D	4
Eye Shadow	03C	1
Cologne and Toilet waters	04A	8
Other Fragrance Preparation	04E	11
Hair Conditioner	05A	29
Hair Spray (aerosol fixatives)	05B	1
Permanent Waves	05D	2
Rinses (non-coloring)	05E	7
Shampoos (non-coloring)	05F	45
Tonics, Dressings, and Other Hair Grooming Aids	05G	7
Wave Sets	05H	27
Other Hair Preparations	05I	13
Hair Shampoos (coloring)	06D	1
Blushers	07A	6
Foundations	07C	1

Leg and Body Paints	07D	1
Makeup Bases	07F	1
Other Makeup Preparations	07I	2
Cuticle Softeners	08B	2
Bath Soaps and Detergents	10A	2
Aftershave Lotion	11A	2
Cleansing	12A	6
Body and Hand (exc shave)	12D	9
Moisturizing	12F	21
Skin Fresheners	12I	5
Other Skin Care Preps	12J	9
Suntan Gels, Creams, and Liquids	13C	2
<b>Total</b>		<b>240</b>

**Benzophenone-5**

Body and Hand (exc shave)	12D	7
Night	12G	3
<b>Total</b>		<b>10</b>

**Benzophenone-6**

Bath Oils, Tablets, and Salts	02A	2
Cologne and Toilet waters	04A	1
Perfumes	04B	2
Shampoos (non-coloring)	05F	1
Tonics, Dressings, and Other Hair Grooming Aids	05G	1
Wave Sets	05H	2
Cuticle Softeners	08B	1
Nail Polish and Enamel	08E	77
Cleansing	12A	1
Moisturizing	12F	2
<b>Total</b>		<b>90</b>

**Benzophenone-8**

Bath Oils, Tablets, and Salts	02A	1
Hair Conditioner	05A	2
Moisturizing	12F	1
<b>Total</b>		<b>4</b>

**Benzophenone-9**

Bubble Baths	02B	20
Bath Capsules	02C	1
Other Bath Preparations	02D	34
Cologne and Toilet waters	04A	2
Perfumes	04B	1
Other Fragrance Preparation	04E	1
Hair Conditioner	05A	9
Rinses (non-coloring)	05E	3

Shampoos (non-coloring)	05F	8
Tonics, Dressings, and Other Hair Grooming Aids	05G	1
Wave Sets	05H	2
Other Hair Coloring Preparation	06H	1
Blushers	07A	1
Makeup Bases	07F	1
Rouges	07G	1
Basecoats and Undercoats	08A	1
Cuticle Softeners	08B	1
Nail Creams and Lotions	08C	1
Aftershave Lotion	11A	3
Cleansing	12A	4
Body and Hand (exc shave)	12D	14
Moisturizing	12F	2
Skin Fresheners	12I	9
Other Skin Care Preps	12J	1
Other Suntan Preparations	13C	1
<b>Total</b>		<b>123</b>

**Benzophenone-11**

Bath Oils, Tablets, and Salts	02A	4
Bubble Baths	02B	4
Other Bath Preparations	02D	1
Cologne and Toilet waters	04A	59
Perfumes	04B	14
Sachets	04D	7
Other Fragrance Preparation	04E	8
Hair Spray (aerosol fixatives)	05B	4
Shampoos (non-coloring)	05F	13
Tonics, Dressings, and Other Hair Grooming Aids	05G	2
Wave Sets	05H	2
Blushers	07A	1
Nail Polish and Enamel	08E	3
Bath Soaps and Detergents	10A	3
Aftershave Lotion	11A	16
Preshave Lotions (all types)	11D	1
Body and Hand (exc shave)	12D	2
Moisturizing	12F	12
Skin Fresheners	12I	11
Other Skin Care Preps	12J	1
<b>Total</b>		<b>168</b>



## Memorandum

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

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

**DATE:** October 15, 2020

**SUBJECT:** Tentative Report: Safety Assessment of Benzophenones as Used in Cosmetics  
(release date: September 25, 2020)

The Personal Care Products Council respectfully submits the following comments on the tentative report, Safety Assessment of Benzophenones as Used in Cosmetics.

### Key Issues

The Introduction should clearly state that this review is about the use of these ingredients as light stabilizers, not as sunscreen ingredients which are considered OTC drugs in the United States. The Introduction should also clearly identify the specific ingredients included in this report.

Biomonitoring – It would be helpful if the biomonitoring studies were summarized in a table. For each study, it should indicate if free or total Benzophenones (includes benzophenone conjugates) were measured. The season in which samples were collected should also be stated for each study.

DART, Oral, Benzophenone-1, -2, -3, -4 and -12; Table 6 – The 3-day rat study of Benzophenone-1 cited to the ECHA dossier (reference 7) should be deleted from the CIR report as the ECHA dossier does not provide sufficient details about this study. The ECHA dossier actually indicates that the NOAEL is 100 mg/kg/day not 10 mg/kg/day as stated in the CIR report. The dossier suggests the information is from a Danish review, and that although an oral study was done, the doses used in the oral study were not stated. The 100 mg/kg/day dose is actually from an IP study (this is what it states under additional information: “Justification for selection of Effect on fertility via oral route: Note that the NOAEL of 100 mg/kg/d was with intra-peritoneal application. With subcutaneous application a NOAEL of 250 mg/kg/d was observed. Effects were also seen after oral application but unfortunately that study did not indicate the dosages used.”). If this study is left in the CIR report, the details need to be corrected in the text and in Table 6.

Other Clinical Reports – With the exception of the old report summary and the patch test study (reference 144), all of the studies in this section are epidemiology studies. Reference 144 should be moved with the other patch test studies.

The tables should include more detailed information than found in the text. For example, rather than providing the range of concentrations/doses tested, all of the actual concentrations/doses used in a study should be stated in the tables. In addition to dietary concentrations, mg/kg doses should also be stated in the tables.

#### Additional Considerations

Introduction – It should be made clear that the NTP study is on Benzophenone-3.

Cosmetic Use; Table 3 – Please include some use information from the 2005 re-review summary.

Dermal Penetration, In Vitro, Benzophenone-3 – What was the receptor fluid used in the study from reference 22? It is not clear what “0.25 g/m<sup>2</sup> or 14% of applied dose” represent. Are these the results for Benzophenone-3 or another sunscreen?

In the description of the methods of the study from reference 25, it would be helpful to state that both fresh and previously frozen pig skin was used (at least that is what the description of the results implies).

Dermal Penetration, In Vitro, Benzophenone-3 and -4 – Was Benzophenone-3 found in the receptor fluid (reference 27)?

Dermal Penetration, Human, Benzophenone-3 – Please indicate how long after application blood samples were taken (reference 23).

ADME, Animal, Dermal, Benzophenone-2 – Please give more information about the frequency of dosing (reference 33). It currently states that rats were dosed with 100 mg/kg for 4 weeks. Was this a daily dose? Were the rats treated 7 days/week?

ADME, Animal, Dermal, Benzophenone-3 – Please clarify the following sentence (reference 34): “It was measurable 24 h after skin application.” Does “it” refer to Benzophenone-3 or its metabolites? Was “it” measurable in the plasma, urine or skin?

In reference 35, were the tissue levels of Benzophenone-3 in the female rats or their offspring?

In the description of reference 37, please make it clear if all of the results were at 72 hours after dosing.

ADME, Animal, Oral, Benzophenone-2 – Please indicate the time after dosing the serum concentrations of Benzophenone-2 represent (reference 38).

ADME, Animal, Oral, Benzophenone-3 – The time after dosing for measurements also needs to be stated for references 40 and 37.

ADME, Human – Because the animal ADME studies were subdivided by route of exposure, it would also be helpful to have a Dermal subheading in the human section.

The time after dosing for measurements needs to be added for references 43 and 44.

Please revise: “time varied between times”.

Reference 49 (measurement of Benzophenone-3 in 100 adolescent girls with a survey of personal care product use) should be moved to the Biomonitoring section.

The estimated absorption of Benzophenone-3 from reference 52 does not belong in the ADME section as this is not actually a study of absorption, distribution, metabolism or excretion.

Acute, old report summary – Please indicate the species tested.

Short-Term, Dermal, Benzophenone-3 – Please correct: “from 43 to 56 d age,”. What happened to the male offspring?

Short-Term, Oral, Benzophenones-3, -4, and -12; Summary – Please identify the organ(s) and describe the microscopic lesions that were observed in mice and rats (2-week studies) at the doses higher than the NOAEL (reference 69).

Subchronic, Oral, Benzophenone-1 and -3 – Please identify the organ and the microscopic lesions that were observed at doses higher than the NOAEL in the 13-week studies in mice and rats (reference 69).

DART, Embryo/Ovary Cultures – Please correct: “germ cell nest breakdown and c a decrease in”

DART, Animal, Dermal, Benzophenone-3; Table 6 – Were the decreases in epididymal sperm density statistically significant (reference 74)? The statistical significance of this change is also not stated in Table 6.

DART, Animal, Oral, Benzophenone-1, -2, -3, -4 and -12 – Please state the target organ for the systemic toxicity observed in mice (reference 77).

Genotoxicity, In Vitro Benzophenone-1, -3, -6, -8 and -12 – It is not clear what is meant by “pseudo-positive”? Is this a weak positive? Increased but not statistically significant?

Since a formulation was tested in reference 68, rather than stating “Benzophenone-3 was not genotoxic”, it should state that a formulation containing Benzophenone-3 was not genotoxic.

Genotoxicity, In Vivo, old report summary – Please revise “significant increase the number of bone marrow nuclei”.



Genotoxicity, In Vivo, Benzophenone-3 – Please revise: “The sunscreen formulation as non-genotoxic.”

Carcinogenicity, Animal, Oral, Benzophenone-3 – It would be helpful to move the conclusion of the mouse study with the description of the mouse study.

In Vitro Cell Transformation, Benzophenone-1 – Please revise: “xenoestrogenic effects by, like E2,”

In Vitro Cell Transformation, Benzophenone-1, -3, -6 and -8 – This subheading (as well as other subheadings) is not consistent with the other subheadings (Benzophenone is written out multiple times in this subheading, it is not written multiple times in other subheadings). Please select one format and use it throughout the report.

In the description of reference 81 most of the units are given as  $\mu\text{g}/\text{ml}$ , but results for Benzophenone-1 says: “below 5  $\mu\text{g}/\mu\text{l}$ ”. Are these units correct?

Endocrine Activation, Benzophenone-2 – In the description of reference 102 on Benzophenone-2, it says: “Benzophenone-3”.

Retrospective and Multicenter Studies, Benzophenone-3; Summary – In the description of reference 119, the following statement is misleading: “and possible (allergic reactions to Benzophenone-3 (3% in petrolatum)) were observed in 22.7% (definite relevance) of patients.” The value of 22.7% is the percentage of persons that reacted to Benzophenone-3 with definite relevance, it is not the percentage of patients that reacted to Benzophenone-3 as stated in the Summary. As Benzophenone-3 was not among the top 15 allergens in this study, the percentage of patients reacting to Benzophenone-3 must have been less than 3.6%. Please state the percentage of patients that reacted to Benzophenone-3 in this study.

Retrospective and Multicenter Studies, Benzophenone-3 – How many photo allergens were studied in reference 121?

Retrospective and Multicenter Studies, Benzophenone-4 – Please state the years of testing for reference 125.

Retrospective and Multicenter Studies, Benzophenone-2, -3 and -4 – What was the time frame for tests completed in reference 128?

Retrospective and Multicenter Studies, Benzophenone-3, -4- and -10 – What dermatology data base, e.g., country, was used, and what was the timeframe of the study described in reference 141?

Case Reports, Benzophenone-2 – Please correct “tolunenesulfonamide”

Case Reports, Benzophenone-3 and -4 – Please correct: “Patch testing with and Benzophenone”

Other Clinical Reports – What were the values of urinary Benzophenone-3 for the quartiles in reference 163. What was measured, free or total Benzophenone-3?

Epidemiological, Benzophenone-1 and -3 – Reference 174 needs to be moved to the Biomonitoring section as this study does not appear to correlate levels of Benzophenone-1 and -3 in biological samples with health endpoints.

Risk Assessment – What was the NOAEL/LOAEL used to determine the margins of safety in reference 25? The dermal penetration study in pig ear skin should be presented in the Dermal Penetration section.

Summary – The statement that “Most benzophenones are soluble in organic solvents, but insoluble in water.” is not accurate. Based on the information in Table 2, all of the benzophenones in this report are soluble in organic solvents. Solubility in water varies from insoluble to soluble (Benzophenone-4).

The SCCP risk assessment is not presented correctly in the Summary. The MOS of 1686 was for use to protect a formulation (0.5%) not use as a sunscreen (6%) as suggested in the Summary.

Zebrafish embryos are mentioned in the first sentence of the paragraph of *in vitro* toxicokinetic studies, but there is no information about results in zebrafish embryos in this paragraph.

In the Summary, please state the compound tested (likely Benzophenone-3) in the 90-day oral studies in rats (NOAEL of 236 mg/kg/day) and in the 13-week oral study in mice. Please state the compound tested in the 13-week dermal study in mice.

In the oral study of Benzophenone-3 in mated Wistar rats, please revise: “was orally at doses of”

Although the investigators may have shown effects on neurons in mice treated sc with 50 mg/kg Benzophenone-3, the Summary should not expand these observations to humans. Please delete: “therefore, can affect infant neurodevelopment.”

In the Summary, please revise the sentence concerning the study of Benzophenone-3 in Sprague-Dawley rats. It currently states: “were treated orally with doses of 0.5, 1.67, or 5 g/kg Benzophenone-3, or a single dose of 5 g/kg/d Benzophenone-3 for five consecutive days.” The following would be clearer: “were treated with a single dose of 0.5, 1.67, or 5 g/kg Benzophenone-3, or five daily doses of 5 g/kg/day”.

Please revise: “Identical doses administered according to the same procedure, and results were negative.”

In the Summary, please indicate the species from which the splenocytes were obtained.

In the Summary, please revise: “Singletons (346) born to 346 mothers and 184 fathers (184) couples”. Were there really more mothers than fathers in this study? It is more likely that some

mothers in this study had more than one child. It would be clearer if it just said “Singletons (346) born to 184 couples”.

Discussion – It is not clear that the heavy metal statement is needed in the Discussion of this report.

Table 4, Reference 9 – In the Protocol column it says microscopic examinations were completed, but the results column only mentions no macroscopic changes. Were there any microscopic changes observed in this study?

Table 5, Reference 6, Wistar rats – The doses should be in the Dose column, rather than the Animals/Group Column. Information about when the animals were treated should be in the study duration column.

Table 6, Reference 74 – Were the decreases in epididymal sperm density statistically significant at all 3 dose levels?

Table 6, Reference 7 – This study is not presented correctly. This is not actually an oral study and the NOAEL was 100 mg/kg/day not 10 mg/kg/day as stated in this table.

Table 6, Reference 40 – In the Results column, the following is stated twice: “On GD10, 15, and 20, the body weights of the dams decreased in a dose-dependent manner. Absolute and relative kidney weights in dams statistically significantly higher in 50,000 ppm exposure group, when compared to control group.” Did the dams really have decreased body weight? Or were the body weight gains of the dams less than controls?

Table 6, Reference 79 – Were rats really given Benzophenone-3 in milk at 3000 or 30,000 ppm? When dams are treated during lactation, it is assumed that the offspring are exposed through milk. Unless Benzophenone-3 was actually added to milk, it is not necessary to include “milk” in the Vehicle column.

Table 6, Reference 71 – The mg/kg doses should be in the Dose/Concentration column, not the Procedure column.

Table 6, Reference 8 – The following belongs in the Results column rather than the Procedure column: “No morbidity observed. Estrous cyclicity unaffected by treatment. All females showed evidence of copulation after cohabitation/mating period.”

Table 6, Reference 72 – The Results section indicates that all embryos were able to inflate the swim bladder at 0.00438 mM – this is not a test concentration listed in the Dose/Concentration column. Is this a measured concentration compared to target concentrations listed in the Dose/Concentration row?

Table 7, Reference 80 – As this is the table for Genotoxicity, the Results column should clearly state whether or not Benzophenone-1 was photo-genotoxic – or the study does not belong in this table.

Table 7, Reference 68 (OECD 474 and 475) – The doses used in this study belong in the Concentration/Dose column, not the Procedure column.

Table 8, Reference 10 – Please include the volume of administration used in the LLNA of Benzophenone-3.