Cosmetic Ingredient Review

Post Meeting Announcement

Expert Panel for Cosmetic Ingredient Safety
175th Meeting (March 12 – 13, 2026) - Findings

March 18, 2026

- **Final Safety Assessment**
  - **Cocoyl Hydrolyzed Collagens – 4 ingredients – Safe**

- **Tentative Safety Assessments**
  - **Alkyl Gallates – 4 ingredients – Safe used when formulated to be non-irritating and non-sensitizing**
  - **2-Bromo-2-Nitropropane-1,3-Diol - 1 ingredient – Safe when formulated to be non-sensitizing**
  - **Dimer Dilinoleates – 7 ingredients – Safe as used**
  - **Polyacrylate-13 - 1 ingredient – Safe as used**
  - **Pyrogallol – 1 ingredient – Insufficient data**

- **Insufficient Data Announcements**
  - **Oxyquinoline – 2 ingredients**
  - **Phosphinates – 3 ingredients**
  - **Phthalates – 3 ingredients**
  - ***Salix alba* (Willow) - 6 ingredients**

- **175th Meeting Notes**
  - **Director's Report**
  - **Presentations**
  - **Re-Review**
    - **1 re-review summary approved (Fossil Waxes)**
  - **Airbrush**
  - **Genotox**
  - **Use Tables**
  - **Scientific Literature Reviews – available or under development**
  - **Next Expert Panel Meeting – Monday and Tuesday, June 15 - 16, 2026 – *in-person only* – The Darcy Hotel, 1515 Rhode Island Avenue, NW, Washington, DC 20005**
    - ***All submissions for this meeting should be received by CIR no later than April 24, 2026***

Final Safety Assessment

Final safety assessments will be posted on the Cosmetic Ingredient Review (CIR) website at www.cir-safety.org. Unpublished data cited as references in CIR safety assessments are available for review. Any interested person who has sound scientific evidence that a final safety assessment is incorrect may petition the Expert Panel for Cosmetic Ingredient Safety (Panel) to amend the safety assessment.

Cocoyl Hydrolyzed Collagens

The Panel reviewed the available data and issued a Final Amended Report concluding that Potassium Cocoyl Hydrolyzed Collagen, TEA-Cocoyl Hydrolyzed Collagen, Cocoyl Hydrolyzed Collagen, and Sodium Cocoyl Hydrolyzed Collagen are safe in cosmetics in the present practices of use and concentration described in the safety assessment. The Panel noted there were no concentrations of use reported for Cocoyl Hydrolyzed Collagen or TEA-Cocoyl Hydrolyzed Collagen; the expectation is that they would be used at concentrations comparable to others in this group.

The Panel noted that the ingredients named in this group are derived from animal sources, and stressed the cosmetics industry should continue to use necessary procedures to limit infectious agents and/or biologically-derived impurities (e.g., nucleic acids, proteins, endotoxins). Additionally, the Panel cautioned that TEA-Cocoyl Hydrolyzed Collagen should not be used in cosmetic products in which *N*-nitroso compounds can be formed.

Tentative Safety Assessments

For the tentative safety assessments listed below, to be posted on the CIR website in the near future, interested persons are given 60 days from the posting date to comment, provide information, and/or request an oral hearing before the Panel. Information may be submitted without identifying the source or the trade name of the cosmetic product containing the ingredient. All unpublished data submitted to CIR will be discussed in open meetings and are available for review by any interested party. Please submit data and/or comments to CIR ***as soon as possible, but no later than 60 days from the actual posting date of the report, for full consideration. Submissions received thereafter may be in jeopardy of not being considered by the Panel at the next review.*** *The updated reports may be scheduled for review by the Panel as early as at the* ***June 15 - 16, 2026 meeting.***

Alkyl Gallates

The Panel reviewed the Draft Amended Report on Caprylyl Gallate, Dodecyl Gallate, Ethylhexyl Gallate, and Propyl Gallate, and issued a Tentative Amended Report for public comment with the conclusion that these ingredients are safe as used when formulated to be non-irritating and non-sensitizing. Safety for this group was supported by the fact that most of these ingredients are approved by the US FDA for use as antioxidants/preservatives in food, and Propyl Gallate is also used in approved oral and topical drug products. Additional support for safety included negative results from a 2-year carcinogenicity study and a multigenerational reproductive toxicity study of Propyl Gallate.

The Panel also discussed several in vitro studies reporting estrogenic activity for Propyl Gallate; however, concern for these effects was considered mitigated as the doses and routes of exposure in those studies are not relevant to cosmetic use. Lastly, the Panel considered a case report describing skin depigmentation following use of products containing gallates, but determined that the effect represented post-inflammatory hypopigmentation resulting from the severity of the reaction rather than a direct effect on melanogenesis.

2-Bromo-2-Nitropropane-1,3-Diol

The Panel reviewed the available data and issued a revised Tentative Amended Report for public comment. The Panel concluded that 2-Bromo-2-Nitropropane-1,3-Diol is safe in cosmetics when formulated to be non-sensitizing, which may be based on a quantitative risk assessment (QRA) or other appropriate methodology.

The concern for possible sensitization prompted the revision and stemmed from the results of a North American Contact Dermatitis Group (NACDG) retrospective cross-sectional study to determine the prevalence of wet wipes as a source of allergy during patch testing. In patients that had a positive patch, 0.9% had an allergic reaction to a wet wipe source, and the reaction rate to 2-Bromo-2-Nitropropane-1,3-Diol in these subjects was 27.4%. 2-Bromo-2-Nitropropane-1,3-Diol is reported to be used at a maximum concentration of 0.05% in disposable wipes.

The Panel noted that 2-Bromo-2-Nitropropane-1,3-Diol may act as a formaldehyde-releaser. However, based on the low maximum concentration of use of 2-Bromo-2-Nitropropane-1,3-Diol in cosmetics, along with the low amount of formaldehyde that could be potentially be released from this ingredient, concerns about this ingredient as a formaldehyde-releaser were mitigated; specifically, the Panel determined that the potential amount of formaldehyde resulting from the cosmetic use of this ingredient would be below the level of concern in their previous safety assessment of formaldehyde as a cosmetic ingredient. The Panel also noted that 2-Bromo-2-Nitropropane-1,3-Diol is a known *N*-nitrosating agent and should not be used in cosmetic products in which *N*-nitroso compounds can be formed.

Dimer Dilinoleates

The Panel reviewed the following 7 dimer dilinoleates and issued a Tentative Report for public comment with the conclusion that these ingredients are safe in cosmetics in the present practices of use and concentration described in the safety assessment.

Bis-Behenyl/Isostearyl/Phytosteryl Dimer Dilinoleyl Dimer Dilinoleate
Bis-Behenyl/Phytosteryl Dimer Dilinoleate
Dimer Dilinoleyl Dimer Dilinoleate
Octyldodecyl/PPG-3 Myristyl Ether Dimer Dilinoleate
Phytosteryl/Isostearyl/Cetyl/Stearyl/Behenyl Dimer Dilinoleate
Phytosteryl Isostearyl Dimer Dilinoleate
Stearyl/PPG-3 Myristyl Ether Dimer Dilinoleate

The Panel noted that it had previously concluded that dilinoleic acid is safe in the present practice of use and concentration described in that safety assessment when formulated to be non-irritating and non-sensitizing; other components of the ingredients found in this report have also been found to be safe as used as cosmetic ingredients. While toxicokinetics data are lacking, significant dermal absorption for these dimer dilinoleate ingredients is not expected. The Panel also noted that heavy metals may be present in these ingredients and stressed that the cosmetics industry should continue to use the necessary procedures to minimize impurities in cosmetic formulations according to limits set by the US FDA and EPA.

Polyacrylate-13

The Panel reviewed the available data and issued a Tentative Report for public comment with the conclusion that Polyacrylate-13 is safe in cosmetics in the present practices of use and concentration described in the safety assessment. Polyacrylate-13 is reported to be used in 1807 cosmetic formulations at up to a maximum concentration of 3.4%. Due to its large average molecular weight, dermal absorption is expected to be minimal; thus, the need for further systemic toxicity data is mitigated. The European Union established limits that Polyacrylate-13 can be used in body leave-on products and other products up to a maximum residual acrylamide content of 0.1 and 0.5 mg/kg, respectively. A trade mixture containing Polyacrylate-13 was reported to comprise < 1 ppm (~1 mg/kg) of residual acrylamide impurities. Since Polyacrylate-13 is comprised in part of acrylamide monomers, manufacturers formulating with Polyacrylate-13 should continue to use current good manufacturing practices (cGMPs) to limit residual acrylamide contamination.

Pyrogallol

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

- Maximum concentration of use in hair dye formulations
- Genotoxicity studies, with metabolic activation, that test for the formation of DNA adducts

The Panel noted the carcinogenic activity observed in mice in both the National Toxicology Program (NTP) study and a co-carcinogenicity study, as well as the positive findings in Ames tests and other in vitro genotoxicity studies conducted with and without metabolic activation. Although tumor formation at the site of dermal application was likely driven primarily by chronic irritation and subsequent inflammatory and regenerative processes, given the absence of systemic carcinogenic effects, the confinement of tumors to the site of application, and the increased incidence of non-neoplastic inflammatory and proliferative skin lesions, the possibility of a genotoxic mode of action could not be excluded. The in vivo genotoxicity results (e.g., micronucleus assay) were negative; however, without additional data demonstrating whether Pyrogallol can or cannot react with DNA (e.g., through in vitro evaluation of DNA adduct formation), concerns regarding the mode of action underlying the carcinogenic findings could not be fully alleviated.

Pyrogallol has been reported to be used in false eyelashes, eyelash and eyebrow adhesives, and nail polish and enamels. However, this ingredient is exempt from certain adulteration and color additive provisions of the FD&C Act only when used as a coal tar hair dye ingredient. Accordingly, because Pyrogallol is not an approved color additive in cosmetics products, use in eye makeup products and manicuring preparations is not permitted in the US. Furthermore, hair dyes, such as those containing Pyrogallol, should not be applied to the eyebrows and eyelashes in that such use can result in lost or permanently damaged vision.

Insufficient Data Announcements

For these Insufficient Data Announcements (IDAs), interested persons are given an opportunity to comment, provide information, and/or request an oral hearing before the Panel. Information may be submitted without identifying the source or the trade name of the cosmetic product containing the ingredient. All unpublished data submitted to CIR will be discussed in open meetings and are available for review by any interested party. Please submit data and/or comments to CIR ***as soon as possible, but no later than May 12, 2026, for full consideration****.* ***Submissions received thereafter might not be considered by the Panel at their next meeting.*** *These reports may be scheduled for review by the Panel as soon as the* ***June 15 - 16, 2026 meeting****.*

Oxyquinoline and Oxyquinoline Sulfate

The Panel reviewed the draft Tentative Amended Report on Oxyquinoline and Oxyquinoline Sulfate and issued a second IDA. The insufficiencies are as follows:

For Oxyquinoline:

- Impurities
- Maximum concentrations of use
- Photoirritation/photosensitization data
- Dermal absorption
- Developmental and reproductive toxicity (DART) data, including a no-observed-adverse-effect-level (NOAEL) on Oxyquinoline
- Clarification regarding use around the eye (specifically whether the reported uses in “eyebrow and eye preparations” include eyebrow and/or eyelash dye products)

For Oxyquinoline Sulfate:

- Method of manufacturing
- Composition and impurities
- Photoirritation/photosensitization data at maximum use concentrations

In lieu of photoirritation/photosensitization data, evidence demonstrating that photoabsorption is not significant may be submitted.

Phosphinate Ingredients

The Panel reviewed the draft Tentative Report on Bis-Trimethylbenzoyl Phenylphosphine Oxide, Ethyl Trimethylbenzoyl Phenylphosphinate, and Trimethylbenzoyl Diphenylphosphine Oxide and issued an IDA. The insufficiencies are as follows:

For all:
- Sensitization data at maximum use concentrations
- Phototoxicity/photosensitization data (for nail products)
- Concentrations of use in non-nail products

For Bis-Trimethylbenzoyl Phenylphosphine Oxide and Ethyl Trimethylbenzoyl Phenylphosphinate:
- Impurities
- Method of manufacturing

For Trimethylbenzoyl Diphenylphosphine Oxide:
- Dermal irritation data at maximum concentration of use

Phthalates

The Panel issued an IDA for Dibutyl Phthalate, Diethyl Phthalate, and Dimethyl Phthalate. The additional data needed to determine the safety of these ingredients are:

- Clarification on the type of current uses and maximum concentration of use for Dibutyl Phthalate
- Maximum concentration of use for Dimethyl Phthalate

Salix alba (Willow) – Derived Ingredients

The Panel reviewed the Draft Report on 6 *Salix alba*–derived ingredients and issued an IDA. The insufficiencies are as follows:

For Salix Alba (Willow) Bark Extract:
- Concentration of use in baby products
- Photoallergenicity data

For Salix Alba (Willow) Leaf Extract:
- DART data
- Photoallergenicity data

For Salix Alba (Willow) Bark Powder, Salix Alba (Willow) Bark Water, Salix Alba (Willow) Extract, and Salix Alba (Willow) Flower Extract:
- Methods of manufacturing
- Composition and impurities
- 28-day dermal toxicity
    - if absorbed, DART and genotoxicity data may be needed
- Dermal sensitization and irritation data at maximum use concentrations
- Phototoxicity/photosensitization data

Additionally, the Panel requested information on particle size and particle size distribution, habits and practices related to airbrush use, and ocular irritation at maximum use concentrations.

175th Meeting Notes

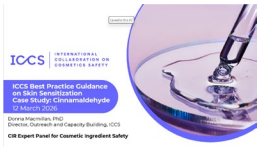
Director's Report

Dr. Heldreth thanked the members of, and liaisons to, the Panel for their tireless efforts to protect consumers. He also thanked Dr. David Cohen for years of expert service on the Panel, as Dr. Cohen is retiring from this Panel effective immediately. While Dr. Cohen is not replaceable, the Panel now has an immediate vacancy to fill. Please send nominations to fill this vacancy directly to heldrethb@cir-safety.org ASAP; nominees should be well-known experts in dermatology and have no financial conflicts of interest with the cosmetics industry, per the statement herein: https://ingredientsafetyexpertpanel.org/conflict-of-interest-statement/.

Dr. Heldreth also enumerated on the ways CIR and the Panel have been valuable over the past 50 years, and continue to be, to consumers and industry alike. He also provided a brief recall of the history of those participating in the program since 1976.

This meeting was the first for new CIR Staff member, Litta Paulson, who joined CIR just a few months prior as a Scientific Analyst. Litta holds a bachelor's degree in Biology and a master's degree in Public Health from Virginia Commonwealth University. Before coming to CIR, she worked in regulatory affairs as a scientific literature specialist, supporting FDA product submissions.

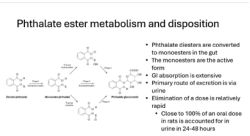
Presentations



Dr. Donna Macmillan, Director of Outreach and Capacity Building, ICCS, provided the Panel with an overview of the ICCS Skin Sensitization Best Practice Guidance and walked through a case study thereof. This guidance utilizes the integration of in silico, in chemico, and in vitro methods, including those aligned with OECD Test Guidelines. The full guidance is freely available here:

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

Dr. George Daston, VMS Research Fellow, Proctor & Gamble, also made a presentation to the Panel. He provided insights on data interpretation relevant to the report on Phthalates, specifically with regard to developmental and reproductive toxicities, and endocrine activation.



Re-Review

In accordance with its Procedures, the Panel evaluates the conclusions of previously-issued safety assessments approximately every 15 years. At this meeting, the Panel considered 1 re-review summary, for which they had previously chosen not to reopen the report. The Panel reaffirmed the conclusion reached in this safety assessment.

- Fossil & Synthetic Waxes - 8 ingredients, original conclusion reaffirmed

Airbrush

Prior to the mandatory reporting of ingredients used in formulations that employ airbrush application, the Panel acknowledged in the Cosmetic Use section of our reports that the data are insufficient to evaluate the exposure resulting from cosmetics applied via airbrush delivery systems. Subsequently, it is restated in the Discussion that the data are insufficient to support the safe use of cosmetic ingredients applied via an airbrush delivery system. However, with the advent of the Modernization of Cosmetics Reform Act of 2022 (MoCRA), it is now known if an ingredient is included in a formulation that uses airbrush application. Accordingly, the Panel was asked to consider stating in the Conclusion that data are insufficient to determine safety in products applied via airbrush application when such use types are reported in the FDA RLD or in response to the Council concentration of use survey. The Panel unanimously responded in the affirmative.

Genotox

The Panel discussed the limitations and current scientific validity of several historical genotoxicity assays, such as the sister chromatid exchange (SCE) assay, unscheduled DNA synthesis (UDS) test, and mouse spot test. These assays are no longer considered acceptable for genotoxicity testing according to updated OECD guidelines. The Panel determined that a standard disclaimer should be included in the genotoxicity section of CIR reports. This disclaimer would clarify that although results from these assays are reported in the published literature, their scientific reliability and regulatory relevance are limited; therefore, such studies will no longer be routinely summarized or used to support the safety evaluation in CIR assessments.

In addition, the Panel discussed the increasing importance of New Approach Methodologies (NAMs) in genotoxicity assessment. The Panel recognized that, when integrated with established guideline studies and existing toxicological data, NAMs can strengthen a weight-of-evidence (WoE) framework for evaluating genotoxic potential and are expected to play an increasingly important role in current genotoxicity testing strategies.

Use Tables

In the past, the use tables in CIR reports were based on the categories used in the Voluntary Cosmetic Registration Program (VCRP). However, with the advent of MoCRA, there have been changes, updates, and additions to the product categories. Accordingly, CIR has updated the use table template utilized by the scientific analysts. The Panel and other stakeholders present were asked for input as to whether the updated tables meet their needs. A consensus was achieved on some changes to the arrangement, but this template will remain a living document, adaptable to changing data sources and stakeholder needs. Additionally, since the Panel determined that evaluating the safety of ingredients as used in tattoo preparations is not within their purview, such uses will not be included in future CIR use tables.

Scientific Literature Reviews

The following Scientific Literature Reviews (SLRs) or Notices to Proceed Without the Preparation of an SLR (NTP) are either posted on the CIR website or are currently under development and may be posted imminently. These may then be presented to the Panel for their review (as Draft Reports) during the next few meetings.

Cannabidiol
Centaurea cyanus flower-derived ingredients
HC Blue No. 15
Houttuynia cordata-derived ingredients
Pelargonium graveolens-derived ingredients
Perfluorohexylethyl Triethoxysilane
Polyacrylate Crosspolymer-6
Pyridoxine and Pyridoxine HCl
Sigesbeckia Orientalis Extract
Sodium Hyaluronate Crosspolymer group
Sodium Hydrosulfite
Xylitylglucoside

Next Expert Panel Meeting

Monday and Tuesday, June 15 - 16, 2026, to be held ***in-person only***, at the Darcy Hotel, Washington, DC. Please check the CIR website for details as the meeting approaches. https://www.cir-safety.org/