

OPINION OF THE SCIENTIFIC COMMITTEE ON COSMETIC PRODUCTS AND NON-FOOD  
PRODUCTS INTENDED FOR CONSUMERS

CONCERNING

LAWSONE

Colipa n° C146

adopted by the SCCNFP during the 16<sup>th</sup> plenary meeting  
of 13 March 2001

## Executive Summary

### 1. General data

- 1.1 Identity of the ingredient : Lawsone (INCI name)  
1.2 CAS n° : 83-72-7  
1.3 Proposed use : as a non-oxidising colouring agent for hair dyeing at a maximum concentration of 1.5%.

### 2. Terms of reference

#### 2.1 Context of the question

The adaptation to technical progress of the Annexes to Council Directive 76/768/EEC of 27 July 1976 on the approximation of the laws of the Member States relating to cosmetic products.

#### 2.2 Request to the SCCNFP

The SCCNFP is requested to answer the following questions :

- \* Is Lawsone safe for use as a non-oxidising colouring agent for hair dyeing?
- \* Does the SCCNFP propose any restrictions or conditions for its use?

### 3. Safety Assessment & Classification

The assessment followed the Notes of Guidance under scientifically based premises of consumer safety and leads to a classification 2A.

This substance has been adequately tested, generally to appropriate guidelines and GLP. It is moderately toxic on acute ingestion, with mortalities occurring at 300 mg/kg and above. Two 13-week studies have shown clear signs of toxicity to the haemopoietic system, kidney, forestomach and liver. Effects were seen as low as 7 mg/kg bw/day and the NOAEL was 2 mg/kg bw/day.

It was shown to be mildly irritant to the rabbit eye but not to cause appreciable skin irritation. This substance is clearly genotoxic *in vitro* and *in vivo*. It induced mutations and chromosome aberrations in mammalian cells *in vitro*. It was positive in two bone marrow micronucleus assays. The negative studies (inadequate studies) do not override the positive results and it is therefore necessary to conclude that it is not possible to establish a safe level for this substance.

Percutaneous penetration of 0.374% is assumed from the available information, but the study conditions were not adequate and this value could be a considerable underestimation.

Overall, it is concluded that this substance is not suitable for use as a non-oxidising colouring agent for hair dyeing.

#### 4. Opinion

Lawsone is toxic, showing toxicity to the kidney, forestomach and haemopoietic system following repeat oral dosing at doses in the region of 7-20 mg/kg bw/day. The NOAEL is 2 mg/kg bw/day.

Percutaneous penetration of 0.374% is assumed from the available information, but the study conditions were not adequate and this value could be a considerable underestimation.

Lawsone is clearly mutagenic and clastogenic *in vitro* and *in vivo* (genotoxic substance, category 3 according to Directive 67/548/EEC relating to the classification, packaging and labelling of dangerous substances)

The SCCNFP is of the opinion that Lawsone is not suitable for use as a non-oxidising colouring agent for hair dyeing.

**Classification 2A : the available data support the conclusion that the substance constitutes a health hazard.**

#### 5. Statement on the toxicological evaluation

The SCCNFP is the scientific advisory body to the European Commission in matters of consumer protection with respect to cosmetics and non-food products intended for consumers.

The Commission's general policy regarding research on animals supports the development of alternative methods to replace or to reduce animal testing when possible. In this context, the SCCNFP has a specific working group on alternatives to animal testing which, in co-operation with other Commission services such as ECVAM (European Centre for Validation of Alternative Methods), evaluates these methods.

The extent to which these validated methods are applicable to cosmetic products and its ingredients is a matter of the SCCNFP.

SCCNFP opinions include evaluations of experiments using laboratory animals; such tests are conducted in accordance with all legal provisions and preferably under chemical law regulations. Only in cases where no alternative method is available will such tests be evaluated and the resulting data accepted, in order to meet the fundamental requirements of the protection of consumer health.

## Full Opinion

### 1. Terms of Reference

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#### 1.3 Definitions of terms where appropriate

Not applicable

## 2. Toxicological Evaluation and Characterisation

### 2.1. General

#### 2.1.1. Primary name

Lawsone (INCI name)

#### 2.1.2. Synonyms

2-hydroxy-1,4-naphthoquinone  
 1,4-naphthalenedione, 2-hydroxy-  
 1,4-naphthoquinone, 2-hydroxy-  
 2-hydroxy-1,4-naphthalenedione  
 2-hydroxynaphthoquinone  
 CI Natural Orange 6

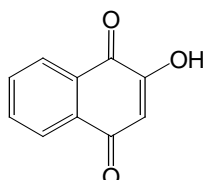
#### 2.1.3. Trade names and abbreviations

Trade name : not stated  
 COLIPA n° : C146  
 Colour Index Number : CI 75480

## Evaluation and opinion on : Lawsone

**2.1.4. CAS no.**

CAS no : 83-72-7

**2.1.5. Structural formula****2.1.6. Empirical formula**

Emp. Formula : C<sub>10</sub>H<sub>6</sub>O<sub>3</sub>  
 Mol weight : 174.16

**2.1.7. Purity, composition and substance codes**

All analytical data relate to batch 8160:FE.

## Purity

Titre as determined by potentiometry	:	99.7%
Water content	:	0.4%
Ash content	:	< 0.2%
Heavy metals	:	< 10 ppm

## Potential impurities

## Reagents and intermediate reaction products

1,4-naphthoquinone	:	< 100 ppm
2-hydroxy-1,4-naphthoquinone-3,3'-dimer	:	0.264%
Acetic acid 2,4-diacetoxy-1,4-dihydro-naphthalene-1-yl ester	:	< 500 ppm

## Solvent residues

None detected (i.e. solvents such as methanol, ethanol, isopropanol, n-propanol, acetone, ethyl acetate, cyclohexane, methyl ethyl ketone and monochlorobenzene < 100 ppm)

**2.1.8. Physical properties**

Subst. Code	:	/
Appearance	:	Yellow to mustard coloured powder
Melting point	:	194.5°C
Boiling point	:	no information

## Evaluation and opinion on : Lawsone

Density	:	no information
Rel. vap. dens.	:	no information
Vapour Press.	:	no information
Log P <sub>ow</sub>	:	no information

### 2.1.9. Solubility

Insoluble in water at 0.2%  
 Soluble in 95% ethanol at 0.5%  
 Soluble in methanol at 1% (50°C)  
 Soluble in ethyl glycol at 5% (80°C)  
 Soluble in dimethyl formamide at 5%

### 2.2. Function and uses

Lawsone is proposed to be used as a non-oxidising hair colouring agent at a maximum concentration of 1.5% (typical concentration 1.26%) in the finished cosmetic product.

## TOXICOLOGICAL CHARACTERISATION

### 2.3. Toxicity

#### 2.3.1. Acute oral toxicity

##### Rat

Guideline	:	Directive 92/69/EEC
Species/strain	:	Sprague Dawley rat ICO: OFASD (IOPS Caw) -strain
Group size	:	5 male + 5 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone suspended in 0.5% aqueous methylcellulose
Batch no	:	8160:FE (purity 99.4%)
Dose	:	200, 310, 500, 800, 1300 and 2000 mg/kg bw (females), 500 and 2000 mg/kg bw (males).
Observ. period	:	14 days
GLP	:	Quality Assurance statement included

Groups of 5 male and 5 female rats received a dose of test substance by gastric gavage. The animals were observed for mortalities and clinical signs for 14 days. Bodyweights were recorded at intervals and macroscopic abnormalities were recorded at autopsy.

##### Results

In females, 0, 1, 2, 3, 5 and 5 of 5 animals died at doses of 200, 310, 500, 800, 1300 and 2000 mg/kg bw, respectively. In the male dose groups, there were no deaths at 500 mg/kg, and 5/5 animals died at 2000 mg/kg. Deaths mainly occurred within 30 min of dosing. Clinical signs of

toxicity were hypo-activity (at 200 mg/kg), piloerection, hyper-salivation and respiratory difficulties. Surviving animals recovered by 2 days (females) or 4 days (males). No abnormalities were seen in animals found dead or at scheduled autopsy.

The LD50 was calculated to be 570 mg/kg for female rats and between 500 and 2000 mg/kg for male rats.

Ref. : 1

### 2.3.2. Sub-chronic oral toxicity

#### First study

Guideline	:	OECD 408 (1981)
Species/strain	:	Sprague Dawley CD strain rat
Group size	:	10 male + 10 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone suspended in Arachis oil
Batch no	:	60522-32 (purity 99.9%)
Dose levels	:	0, 8, 20 and 50 mg/kg bw/day, 7 days/week by gavage
Exposure period	:	13 weeks
GLP	:	Quality Assurance statement included

Groups of 10 male and 10 female rats were dosed with the test substance by gavage at 0, 8, 20 and 50 mg/kg bw/day, 7 days/week by gavage for 13 weeks. The dosing solutions were analysed before the start of the study for stability, and on each formulation (prepared weekly) for verification of concentration. During the study, the animals were observed for clinical signs and mortality (daily for 29 days and then weekly), weekly for bodyweight and food consumption, and during weeks 1, 6 and 12 for water consumption. In week 13 blood was sampled from the lateral tail vein for haematology and blood biochemistry. At the end of the treatment periods, a full autopsy was conducted with recording of weights, and macroscopic and microscopic examination of major organs. Ophthalmological examination was conducted before the start of the study and at the end of the treatment period on controls and high dose animals.

#### Results

There were no mortalities, except that one female (dosed at 20 mg/kg/day) was killed in extremis on day 53 following a physical injury. Coloration of the urine was noted in all treated animals with a dose-related intensity, accompanied by staining of the fur and tail at the high dose. Some high dose animals exhibited increased salivation towards the end of the study. Other clinical signs were sporadic throughout all dose groups and not considered to be treatment-related. A slight decrease in food consumption was noted for the high dose animals of both sexes, during weeks 2 to 5. Consumption at other times and for other dose groups was comparable to control. Bodyweight gain was decreased in males at 50 mg/kg bw/day, and in females throughout the dose groups in a clear dose-dependent manner throughout the study. Statistical analysis is not noted in the report. Terminal body weights were 98%, 93% and 90% of control at 8, 20 and 50 mg/kg bw/day, respectively. Water consumption was increased in high dose animals of both sexes during weeks 6 and 12. No abnormalities were noted during ophthalmological examinations.

There was evidence of haemolytic anaemia in females dosed at 50 mg/kg bw/day, seen as decreased haemoglobin, haematocrit and erythrocyte counts, and increased mean corpuscular volume. These parameters were not significantly different from control in the males or lower dose females. All female dose groups exhibited a significant, but not dose-related decrease in clotting time.

Dose-related decreases in blood urea, creatinine and albumin/globulin ratio, and increased bilirubin were seen in females, which were significant at 20 and 50 mg/kg bw/day. Similar changes were seen in the males at the high dose, but not at the mid dose. Other slight differences in biochemical parameters were minor, not-dose related and not considered to be of toxicological significance.

Macroscopic abnormalities noted at autopsy related to the adrenals, bladder, forestomach and kidneys at 50 mg/kg bw/day, and confined to the stomach and kidney at 8 and 20 mg/kg bw/day. Dose-related increases in kidney, liver and spleen weights were apparent for both sexes. These were significantly higher than control at all doses for the relative kidney weights in the male (112%, 118%, 124%, respectively), and for the relative liver weight in the females (108%, 114% and 131%, respectively). Relative spleen weights were significantly elevated in the mid and high dose animals (males: 123% and 161%; females: 128% 188%, respectively). These changes in weight were accompanied by a number of histo-pathological abnormalities. Extramedullary haemopoiesis and haemosiderin accumulation were noted in the spleen of both sexes at high dose and mid dose males. Renal tubular pigment deposits (Perl's positive) and tubular basophilia/dilatation/degeneration for both sexes at high dose. Acanthosis, hyperkeratosis and subepithelial inflammatory cell infiltrates were noted in the stomachs of animals of all dose groups.

The study failed to identify a NOAEL for gastric and renal effects.

Ref. : 5.1

## Second study

Guideline	:	OECD 408 (1981)
Species/strain	:	Sprague Dawley Crl CD (SD)BR strain rat
Group size	:	10 male + 10 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone suspended in 0.5% aqueous methylcellulose
Batch no	:	8160:FE (purity 99.4%)
Dose levels	:	0, 2, 7 and 20 mg/kg bw/day, 7 days/week by gavage
Exposure period	:	13 weeks
GLP	:	Quality Assurance statement included

Groups of 10 male and 10 female rats were dosed with the test substance by gavage at 0, 2, 7 and 20 mg/kg bw/day, 7 days/week for 13 weeks. The dosing solutions were analysed before the start of the study for stability, and on each formulation (prepared weekly) for verification of concentration. During the study, the animals were observed daily for clinical signs and mortality, and weekly for bodyweight and food consumption. In week 13, overnight urine was collected and blood was sampled from the orbital sinus for urinalysis, haematology and blood biochemistry. At the end of the treatment periods, a full autopsy was conducted with recording of weights, and macroscopic and microscopic examination of major organs. Ophthalmological examination was conducted before the start of the study and at the end of the treatment period on controls and high dose animals.

## Results

There were no mortalities. Coloration of the urine was noted from week 10 in animals dosed at 20 mg/kg bw/day, accompanied by staining of the tail in females. Hyper-salivation was reported in 4/10 high dose males from week 2 onwards. Other clinical signs were sporadic throughout all dose groups and not considered to be treatment-related. Bodyweight gain and food consumption



was comparable for all dose groups. A small number of minor abnormalities was reported from the ophthalmological examinations, with similar incidence in controls and treated animals. There was an apparent dose-related decrease in erythrocyte count in females, which was significantly lower than control at 7 and 20 mg/kg bw/day. A significant decrease was also seen in males at the top dose only. Other small differences showed no evidence of dose-response relationship. The study authors considered that for all haematological parameters the differences were small and the individual values were within or close to the normal range, and concluded that they were not of toxicological significance.

Dose-related decreases in blood urea, creatinine and albumin/globulin ratio, and increased bilirubin were seen in females, for which albumin/globulin was significant at all dose levels, urea at 7 and 20 mg/kg bw/day, and creatinine only at the high dose. Creatinine was also significantly reduced in the males at the high dose. A dose-related decrease in blood glucose and increase in triglycerides was also apparent in the males. Other slight differences in biochemical parameters were not-dose related. The study authors considered that for all biochemical parameters the differences were small and the individual values were within or close to the normal range, and concluded that they were not of toxicological significance. There were no differences in urinary parameters.

Macroscopic abnormalities noted at autopsy related to the forestomach and kidneys in animals dosed at 20 mg/kg bw/day.

Dose-related increases in kidney and spleen weights were apparent for both sexes, and for liver of females. The female relative kidney weights were significantly higher than control at 7 and 20 mg/kg bw/day (115% and 129%, respectively). Other increases were only significant at the high dose (spleen: male 129%, female 128%; kidney: male 112%; liver: female 111%).

Minimal to slight haemopoiesis was noted in the spleen of some animals of all dose groups with an increased incidence and/or intensity in males at 7 mg/kg bw/day and in both sexes at 20 mg/kg bw/day.

Renal tubular basophilia was reported in some animals of all dose groups with an increased incidence and/or intensity in both sexes at 20 mg/kg bw/day, at which dose it was accompanied by dilatation and/or pigment accumulation degeneration in some animals. The incidence at 7 mg/kg bw/day was comparable to control. In the forestomach, minimal to slight focal or multifocal ulceration of the mucosa, or minimal to slight interstitial oedema were reported with an increased incidence in both sexes at 7 mg/kg bw/day.

The authors concluded that treatment-related effects occurred at 20 mg/kg bw/day, affecting mainly the kidneys, forestomach and spleen, and that the NOAEL was 7 mg/kg bw/day.

Significant changes were seen at 7 mg/kg bw/day which were consistent with the effects at 20 mg/kg bw/day in this study, and at higher doses in the first 13-week study (ref. 5.1). A NOAEL of 2 mg/kg bw/day should therefore be assumed.

Ref. : 5.2

## **2.4. Irritation & corrosivity**

### **2.4.1. Irritation (skin)**

Guideline	:	OECD 404 (1987)
Species/strain	:	New Zealand albino rabbit
Group size	:	3 males
Test substance	:	2-Hydroxy-1,4-naphthoquinone, neat and suspended at 2% in 0.5% aqueous methylcellulose
Batch no	:	8160 FE (purity 99.4%)
Dose	:	0.5 g or 0.5 ml



## Evaluation and opinion on : Lawsone

GLP : challenge : 0.5 ml 1% test substance for 24 hours, occluded  
Quality Assurance statement included

Induction commenced with three intradermal injections, of FCA, test substance (1.0%), and a mixture of these two. Six days later 0.5 ml of 10% lauryl sulphate was applied to the injection site to induce a local irritation, and the next day the induction process was completed with a single topical application of 0.5ml of the test substance (1%) under occlusive patch for 48 hours. An interval of 2 weeks was allowed after induction and then the animals were challenged by a single 0.5 ml topical application of the test substance (1%) under occlusive patch on the flank for 24 hours. Appropriate controls were treated with vehicle. The skin was examined 24 and 48 hours after removal of the challenge patches.

*Results*

After the challenge, evaluation of erythema was obscured by brown staining of the skin at both 24 and 48 hours. Oedema was not observed in any of the animals. Histological examination of skin biopsies revealed changes in all treated animals. The authors considered that the reactions in 13/20 animals were due to sensitisation reactions and classified the substance as a strong sensitiser.

However, it is not possible to distinguish between irritation and sensitisation on the basis of histological examination.

Ref. : 4.1

**Magnusson and Kligman study**

Guideline : OECD 406 (1992)  
Species/strain : Dunkin-Hartley guinea pig  
Group size : 10 male + 10 female in test group, 5 male + 5 female in control group  
Test substance : 2-Hydroxy-1,4-naphthoquinone dissolved in paraffin oil  
Batch no : 8160:FE (purity 99.4%)  
Concentrations : intradermal induction : 0.1 ml 50% Freund's complete adjuvant (FCA)  
0.1 ml 10% test substance  
0.1 ml % 10% test substance/FCA (1:1)  
induction of irritation : 0.5 ml of 10% sodium lauryl sulphate in vaseline  
topical induction : 0.5 ml 40% test substance for 48 hours, occluded  
challenge : 0.5 ml 40% and 2% test substance for 24 hours,  
occluded  
GLP : Quality Assurance statement included

Induction commenced with three intradermal injections, of FCA, test substance (40%), and a mixture of these two. Six days later 0.5 ml of 10% lauryl sulphate was applied to the injection site to induce a local irritation, and the next day the induction process was completed with a single topical application of 0.5ml of the test substance (40%) under occlusive patch for 48 hours. An interval of 2 weeks was allowed after induction and then the animals were challenged by a single 0.5 ml topical application of the test substance (40%) on the left flank and 2% on the right flank under occlusive patch for 24 hours. Appropriate controls were treated with vehicle. The skin was examined 24 and 48 hours after removal of the challenge patches.

*Results*

After the challenge, evaluation of erythema was obscured by orange staining of the skin at both 24 and 48 hours. Oedema was not observed in any of the animals. Histological examination of skin biopsies revealed changes in all treated animals, which were considered to be equivocal by the study authors. However, the slides were peer-reviewed by CIT at a later date, resulting in the conclusion that sensitisation occurred in 8/10 animals challenged with 2% test substance and in 9/10 animals challenged with 40% test substance. Remaining animals exhibited reactions that did not meet the criteria either for a positive response or for a negative response and were therefore considered to be equivocal.

However, it is not possible to distinguish between irritation and sensitisation on the basis of histological examination.

Ref. : 4.2

**2.6. Teratogenicity**

Guideline	:	OECD 414 (1981)
Species/strain	:	Sprague-Dawley rat, Crl: CD (SD) BR strain
Group size	:	25 females (mated)
Test substance	:	2-Hydroxy-1,4-naphthoquinone suspended in 0.5% aqueous methylcellulose
Batch no	:	8160:FE (purity 99.4%)
Dose levels	:	0, 2, 7 and 20 mg/kg bw/day
Treatment period	:	Days 6 to 15 of pregnancy, inclusive
GLP	:	Quality Assurance statement included

Groups of 25 female rats were dosed with the test substance by gavage at 0, 2, 7 and 20 mg/kg bw/day on days 6 to 15 after mating. The dams were observed daily for clinical signs and mortality, bodyweight and food consumption were recorded on days 0, 2, 6, 9, 12, 15 and 20. The dams were sacrificed on day 20 of pregnancy, and examined for number of corpora lutea, number and distribution of live and dead foetuses, of early or late resorptions and of implantation sites, and for macroscopic observations. The foetuses were examined for bodyweight, sex and macroscopic external observations, and for skeletal and visceral abnormalities (half for each endpoint).

*Results*

There were no mortalities or clinical signs of toxicity. One high dose female aborted on day 15, which was not considered to be treatment-related because there were no prior signs of toxicity or macroscopic changes. Food consumption and bodyweight gains were significantly lower at 20 mg/kg bw/day but comparable for other dose groups. Mean bodyweight of the high dose group was 97% of control at the end of the treatment period (day 15). No treatment-related maternal abnormalities were noted at the scheduled autopsy. The mean numbers of corpora lutea, live foetuses, sex distribution and the mean foetal bodyweights were comparable for control and treated groups. The incidence of foetal abnormalities or malformations was comparable for all dose groups.

There was slight maternal toxicity at 20 mg/kg bw/day but not embryo-toxicity or teratogenicity. The NOAEL was 7 mg/kg bw/day for materno-toxicity.

The significance of the single abortion at 20 mg/kg bw/day is unclear. However it does not influence the conclusion with respect to the NOAEL.

Ref. : 12

## 2.7. Toxicokinetics (incl. Percutaneous Absorption)

### 2.7.1. Percutaneous Absorption *in vitro*

Guideline	:	none available
Tissue	:	Human mammary epidermis, heat-separated
Method	:	Franz diffusion cell (static)
Test substance	:	2-Hydroxy-1,4-naphthoquinone, 1.78% in formulation
Batch no	:	8160:FE (purity: 99.4%)
Dose levels	:	c. 40mg formulation in the presence/absence of 10 mg hair
Replicate cells	:	9 cells without hair and 15 cells with hair
GLP	:	Study not in compliance

The skin penetration of Colipa C146 was evaluated in a static Franz diffusion cell system. Human epidermis was prepared by heat-separation from previously frozen mammary skin. The test substance was prepared at a concentration of 1.78% in a formulation. Approximately 40 mg of the mixture was applied to 2cm<sup>2</sup> of epidermal membrane with and without addition of 10 mg finely chopped bleached hair for 30 minutes and then excess washed off with 2% sodium lauryl sulphate solution and dried. Four hours later the levels of substance were measured in the receptor fluid (physiological saline) using HPLC. Integrity of the epidermal membrane was checked by microscopy before the study, and by means of addition of Chinese ink at the end of the study.

#### *Results:*

Penetration was calculated to be 0.374% of applied dose in the presence of hair and 0.363% in the absence of hair.

This study did not include determination of recovery of the test substance. Physiological saline was used as the receptor fluid, which may not be adequate for a relatively lipophilic substance, and insufficient time was allowed for permeation from the epidermal membrane into the receptor fluid.

The study is considered inadequate (see SCCNFP Notes of Guidance).

Ref. : 13

## 2.8. Mutagenicity/Genotoxicity

### 2.8.1 Mutagenicity/Genotoxicity *in vitro*

#### **Bacterial gene mutation assay**

Guideline	:	OECD 471 (1983)
Species/strain	:	<i>Salmonella typhimurium</i> , TA98, TA100, TA1535, TA1537 <i>Escherichia coli</i> WP2uvrA
Replicates	:	Triplicate plates, 2 independent tests
Test substance	:	2-Hydroxy-1,4-naphthoquinone in DMSO
Batch no	:	8161:FE (purity: 99.4%)
Concentrations	:	25 - 600 µg/plate with and without metabolic activation
GLP	:	Quality Assurance statement included

Colipa C146 has been investigated for gene mutation in *Salmonella typhimurium* and *Escherichia coli* using a plate incorporation and pre-incubation protocol. Liver S9 fraction from rats pre-treated with Aroclor 1254 was used as the exogenous metabolic activation system. The concentration range was selected following a preliminary study which showed toxicity at and above 500 µg/plate. Negative and positive controls were in accordance with the OECD guideline.

#### Results

There were no significant increases in revertants in any of the tester strains, with or without metabolic activation. The positive control agents gave the expected results.

Ref. : 6

#### Mammalian cell gene mutation assay

OECD guideline :	OECD 476 (1984)
Species/strain :	Mouse lymphoma L5178Y TK <sup>±</sup> cells
Replicates :	2 independent tests
Test substance :	2-Hydroxy-1,4-naphthoquinone in DMSO
Batch no :	294028 (purity not stated in study report)
Concentr. scored :	25 – 800 µg/ml with and without metabolic activation
GLP :	Quality Assurance statement included

Colipa C146 has been investigated for induction of cell mutations at the TK locus in mouse lymphoma L5178Y cells. Liver S9 fraction from Aroclor 1254-induced rats was used as the exogenous metabolic activation system. The maximum concentration was determined on the basis of a preliminary study which showed toxicity at and above 500 µg/ml. Negative and positive controls were in accordance with the OECD guideline.

#### Results

Significant increases in mutation frequency were seen at all concentrations in the presence of S9 in both experiments, with a poor dose-response relationship. A slight increase was seen in the absence of S9. The substance showed mutagenic activity with and without metabolic activation.

Ref. : 7

#### Mammalian cytogenetic assay in CHO cells

Guideline :	OECD 473 (1983)
Species/strain :	Chinese Hamster Ovary (CHO) cells
Replicates :	Duplicate cultures, one experiment only
Test substance :	2-Hydroxy-1,4-naphthoquinone in DMSO
Batch no :	8160:FE (99.4%)
Concentr. scored :	30, 100 and 300 µg/ml without metabolic activation 300, 1000 and 5000 µg/ml with metabolic activation
GLP :	Quality Assurance statement included

Colipa C146 has been investigated for induction of chromosomal aberrations in CHO cells. Liver S9 fraction from rats pre-treated with Aroclor 1254 was used as the exogenous metabolic activation system. The test concentrations were selected based on the recommended maximum

according to current guidelines. Exposure was continuous without S9 and for 3 hours with S9, both with a 21 harvest time. Negative and positive controls were in accordance with the OECD guideline.

#### *Results*

There was a significant increase in aberrant cell frequency, with activation at the top concentration of 5000 µg/ml. There were no increases in the absence of S9. The positive control agent gave the expected result. The substance was clastogenic at 5000 µg/ml in the presence of metabolic activation.

Ref. : 8

### **2.8.2. Mutagenicity/Genotoxicity *in vivo***

#### **Mouse bone marrow micronucleus test – first study**

Guideline	:	OECD 474 (1983)
Species/strain	:	Mouse, CrI:NMRI BR outbred strain
Group size	:	5 male + 5 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone in DMSO
Batch no	:	batch not stated (purity: > 98%)
Dose levels	:	0 and 250 mg/kg bw, p.o.
Sacrifice times	:	24, 48 and 72 hours
GLP	:	Quality Assurance statement included

Colipa C146 has been investigated for induction of micronuclei in the bone marrow cells of mice. The substance was administered once by gavage at 0 and 250 mg/kg bw and the bone marrow harvested after 24, 48 and 72 hours. Negative and positive controls were in accordance with the OECD guideline.

#### *Results:*

There was a significant increase in the incidence of micro-nucleated polychromatic erythrocytes in the 72 hour test group (combined males and female data) but not at the other harvest times. The positive control agent gave the expected results. The substance was positive in the micronucleus assay.

Ref. : 9.1

#### **Mouse bone marrow micronucleus test – second study**

Guideline	:	OECD 474 (1983)
Species/strain	:	Mouse, CrI:NMRI BR outbred strain
Group size	:	5 male + 5 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone in DMSO
Batch no	:	batch not stated (purity: > 98%)
Dose levels	:	0, 25, 110 and 250 mg/kg bw, p.o.
Sacrifice times	:	72 hours
GLP	:	Quality Assurance statement included

In a second study, the substance was administered once by gavage at 0, 25, 110 and 250 mg/kg bw and the bone marrow harvested after 72 hours. Negative and positive controls were in accordance with the OECD guideline.

*Results:*

There were significant increases in the incidence of micro-nucleated polychromatic erythrocytes at 110 and 250 mg/kg bw (combined males and female data) but not at 25 mg/kg bw. The results show evidence of a positive dose response relationship and were reported to be increased beyond the range of the historical negative control data. The positive control agent gave the expected results.

The study confirmed the results of the previous study.

Ref. : 9.2

### **Mouse bone marrow micronucleus test – third study**

Guideline	:	OECD 474 (1983)
Species/strain	:	Mouse, Swiss OF1/ICO (IOPS Caw) strain
Group size	:	5 male + 5 female
Test substance	:	2-Hydroxy-1,4-naphthoquinone in 0.5% aqueous methylcellulose
Batch no	:	8160:FE (purity: 99.4%)
Dose levels	:	0, 30, 100 and 300 mg/kg bw, p.o.
Sacrifice times	:	24 and 48 hours
GLP	:	Quality Assurance statement included

In a third study, the substance was administered once by gavage at 0, 30, 100 and 300 mg/kg bw and the bone marrow harvested after 24 and 48 hours. Negative and positive controls were in accordance with the OECD guideline.

*Results:*

There were no significant differences between control and treated groups with respect to the incidence of micro-nucleated polychromatic erythrocytes at either harvest time. The ratio of polychromatic to normo-chromatic erythrocytes was significantly lower for all doses at the 24 hour harvest and at 30 and 300 mg/kg at the 48 hour harvest, indicating that the substance had reached the bone marrow. The positive control agent gave the expected results.

The authors concluded that the substance did not induce cytogenetic damage under the conditions of the assay. This study did not include the 72 hour harvest which showed positive results in the first two studies and is therefore considered inadequate.

Ref. : 9.3

### **Chromosome aberration study in bone marrow cells of Chinese hamster**

Guideline	:	-
Species/strain	:	Chinese hamster
Group size	:	5 male + 5 female
Test substance	:	FC 200488 suspended in arachis oil
Batch no	:	201 007/585 (purity not stated in study report)
Dose levels	:	0 and 200 mg/kg bw, p.o.
Sacrifice times	:	6, 24 and 48 hours



GLP : Quality Assurance statement included

Colipa C146 has also been tested for induction of chromosome aberrations *in vivo* in the hamster. The substance was administered once by gavage at 0 and 200 mg/kg bw and the bone marrow harvested after 6, 24 and 48 hours. Negative and positive controls were in accordance with the OECD guideline.

*Results:*

There were no significant differences between control and treated groups with respect to the incidence of chromosome aberrations at any harvest time. The positive control agent gave the expected results.

The substance did not induce cytogenetic damage under the conditions of the assay, which did not include the 72 hours analysis. The study is considered inadequate.

Ref. : 10

**Rat liver *in vivo/in vitro* UDS assay**

OECD guideline : draft guideline of 1991  
 Species/strain : Wistar rat, HanIbm: WST (SPF) strain  
 Group size : 4 male  
 Test substance : FC 200488 in DMSO/polyethylene glycol 400 (1:9)  
 Batch no : 29.6.93 (purity > 98%)  
 Dose levels : 0, 150 and 1500 mg/kg bw  
 Sacrifice times : 16 hours: all dose groups; 2h: high dose group  
 GLP : Quality Assurance statement included

Colipa C146 has been investigated for induction of unscheduled DNA synthesis (UDS) in rat hepatocytes *in vitro* following *in vivo* dosing. A preliminary toxicity study resulted death of 2/2 animals at 2000 mg/kg bw and signs of toxicity but no mortalities occurred at 1500 mg/kg bw. Negative and positive controls were in accordance with the OECD guideline. Animals were sacrificed after 16 hours, and for an additional high dose group after 2 hours. Four animals were dosed per group, and three of them used for isolation of hepatocytes, which were then treated with <sup>3</sup>H-thymidine *in vitro*. Incorporation of radiolabel was assessed using autoradiography.

*Results:*

There were no differences in the viability of hepatocytes isolated from rats of different dose groups. The results met all the pre-defined criteria for a negative response and therefore the test substance was not found to induce UDS. The positive control agent gave the expected results.

*Remark:*

The substance code (FC 200488) used in the last two studies is not listed in the synonyms for Colipa 146 in the Colipa summary.

Ref. : 11

**2.9. Carcinogenicity**

No data

**2.10. Special investigations**

A small number of scientific publications were included in the dossier, but not described in the Colipa summary. They are reviewed briefly here :

**Substituted 1,4-naphthoquinones vs. the ascitic sarcoma 180 of mice**

A series of 1,4-naphthoquinones were tested for activity against the ascitic form of sarcoma 180 tumour in mice. 2-Hydroxy-1,4-naphthoquinone was considered to have poor antitumour activity.

Ref. : 14

**Some aspects of activity profile of sodium lawsonate in mice and rats**

This paper does not include information on 2-hydroxy-1,4-naphthoquinone

Ref. : 15

**Mutagenicity of natural naphthoquinones and benzoquinones in the Salmonella/microsome test**

2-Hydroxy-1,4-naphthoquinone was mutagenic to *S typhimurium* strain TA2637 with metabolic activation (not tested in the absence of S9), but not to TA98 or TA100. TA2637 is not used in routine mutagenicity testing, but the result does not modify the conclusions with respect to the genotoxicity of 2-hydroxy-1,4-naphthoquinone.

Ref. : 16

**Non-mutagenicity of the hair dye, henna, in the Ames test**

2-Hydroxy-1,4-naphthoquinone was mutagenic to *S typhimurium* strain TA98 at 500 to 1000 µg/plate in the absence of metabolic activation. Henna (which contains 2-hydroxy-1,4-naphthoquinone at a concentration of about 1% in the dried leaves) was not mutagenic up to 1000 µg/plate. This result does not modify the conclusions with respect to the genotoxicity of 2-hydroxy-1,4-naphthoquinone.

Ref. : 17

These publications do not supply relevant supplementary information for the safety evaluation of Colipa C146.

**2.11. Safety evaluation****CALCULATION OF THE MARGIN OF SAFETY**

Lawsone

(Non-oxidising)

***NOT APPLICABLE***

Based on a usage volume of 35 ml, containing at maximum xx %

Maximum amount of ingredient applied	I (mg)	=	
Typical body weight of human		=	60 kg
Maximum absorption through the skin	A (%)	=	
Dermal absorption per treatment	I x A	=	
Systemic exposure dose (SED)	I x A / 60 kg	=	
No observed adverse effect level (mg/kg) (rat, 13-week study)	NOAEL	=	

Margin of Safety	NOAEL / SED	=
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**2.12. Conclusions**

This substance has been adequately tested, generally to appropriate guidelines and GLP. It is moderately toxic on acute ingestion, with mortalities occurring at 300 mg/kg and above. Two 13-week studies have shown clear signs of toxicity to the haemopoietic system, kidney, forestomach and liver. Effects were seen as low as 7 mg/kg bw/day and the NOAEL was 2 mg/kg bw/day.

It was shown to be mildly irritant to the rabbit eye but not to cause appreciable skin irritation. This substance is clearly genotoxic *in vitro* and *in vivo*. It induced mutations and chromosome aberrations in mammalian cells *in vitro*. It was positive in two bone marrow micronucleus assays. The negative studies do not override the positive results and it is therefore necessary to conclude that it is not possible to establish a safe level for this substance.

According to Commission Directive 67/548/EEC relating to the classification, packaging and labelling of dangerous substances, Lawsone is classified as a category 3 mutagen.

Percutaneous penetration of 0.374% is assumed from the available information, but the study conditions were not adequate and this value could be a considerable underestimation.

Overall, it is concluded that this substance is not suitable for use as a non-oxidising colouring agent for hair dyeing.

**Classification 2A : the available data support the conclusion that the substance constitutes a health hazard.**

### 2.13. References

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11. Cytotest Cell Research GmbH and Co., Germany. Study No: 432628 (Sept 1993)
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### 3. Opinion of the SCCNFP

Lawsone is toxic, showing toxicity to the kidney, forestomach and haemopoietic system following repeat oral dosing at doses in the region of 7-20 mg/kg bw/day. The NOAEL is 2 mg/kg bw/day.

Percutaneous penetration of 0.374% is assumed from the available information, but the study conditions were not adequate and this value could be a considerable underestimation.

Lawsone is clearly mutagenic and clastogenic *in vitro* and *in vivo* (genotoxic substance, category 3 according to Directive 67/548/EEC relating to the classification, packaging and labelling of dangerous substances)

The SCCNFP is of the opinion that Lawsone is not suitable for use as a non-oxidising colouring agent for hair dyeing.

### 4. Other considerations

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### 5. Minority opinions

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