Scientific Committee on Consumer Safety

SCCS

OPINION ON

Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87)

- Submission II

The SCCS adopted this Opinion at its plenary meeting on 26 February 2019
ACKNOWLEDGMENTS

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All Declarations of Working Group members are available on the following webpage:
http://ec.europa.eu/health/scientific_committees/experts/declarations/sccs_en.htm
1. ABSTRACT

The SCCS concludes the following:

(1) In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?

Based on the data submitted, the SCCS concluded that the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), as a UV-filter in cosmetic products up to a maximum concentration of 3%, can be considered safe.

Inhalation toxicity was not assessed in this Opinion because no data were provided. Hence, this Opinion is not applicable to any sprayable products that could lead to exposure of the consumer’s lung by inhalation.

(2) If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?

/

(3) Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) in cosmetic products?

As in the previous Submission, adequate studies on skin and eye irritation have not been provided in this Submission. Hence, skin and eye irritation potential of S87 cannot be excluded.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

Keywords: SCCS, scientific opinion, Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), UV-filter, Regulation 1223/2009, CAS 1419401-88-9, EC 700-860-3

Opinion to be cited as: SCCS (Scientific Committee on Consumer Safety), Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II, 26 February 2019, SCCS/1605/19
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SCCS

The Committee shall provide Opinions on questions concerning health and safety risks (notably chemical, biological, mechanical and other physical risks) of non-food consumer products (for example cosmetic products and their ingredients, toys, textiles, clothing, personal care and household products such as detergents, etc.) and services (for example: tattooing, artificial sun tanning, etc.).

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2. MANDATE FROM THE EUROPEAN COMMISSION

Background

Submission I on the UV-filter Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9), with the chemical name 2-Ethoxyethyl (2Z)-2-cyano-2-[3-(3-methoxypropylamino)cyclohex-2-en-1-ylidene]acetate, was submitted by Cosmetics Europe in June 2016.

In July 2017 the SCCS adopted an Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9) (SCCS/1587/17), with the following conclusion:

Based on the data provided, the SCCS is of the opinion that genotoxic potential of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) cannot be excluded. Therefore, the SCCS cannot conclude on the safety of S87.

More evidence is needed to exclude the genotoxicity concern regarding S87.

On the basis of the studies provided, skin and eye irritation potential of the test item cannot be excluded. Dermal penetration data using 5% of the test material should also be provided.

Submission II on the UV-filter Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) (CAS 1419401-88-9), was transmitted by Cosmetics Europe in July 2018.

According to the applicant the current Submission constitutes industry’s response to the request for further information in the first SCCS Opinion (SCCS/1587/17). In addition, the current Submission is intended to support the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) as UV-filter in cosmetic products up to a maximum concentration of 3%.

Terms of reference

(1) In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?

(2) If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?

(3) Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) in cosmetic products?
3. OPINION

3.1 Chemical and Physical Specifications

3.1.1 Chemical identity

3.1.1.1 Primary name and/or INCI name

Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87)

3.1.1.2 Chemical names

IUPAC name: 2-ethoxyethyl (2Z)-2-cyano-2-[3-(3-methoxypropylamino) cyclohex-2-en-1-ylidene]acetate

3.1.1.3 Trade names and abbreviations

Colipa No. S 87
C-1701 B_C_3
C-1701 Merocyanine

3.1.1.4 CAS / EC number

CAS: 1419401-88-9
EC: 700-860-3


3.1.1.5 Structural formula

![Structural Formula](image)

3.1.1.6 Empirical formula

C$_{17}$H$_{26}$N$_2$O$_4$
### 3.1.2 Physical form

The UV filter C-1701 B_C_3 is a yellow solid consisting in form of a powder or small chunks.

### 3.1.3 Molecular weight

Molecular weight: 322.41 g/mol

### 3.1.4 Purity, composition and substance codes

**Batch/Lot:**
- 1442/3+4
- C-1701/8
- 0009511412

Chemical characterisation was performed by UV, FTIR and $^1$H- and $^{13}$C-NMR spectroscopy on the batches 1442/3+4 and C-1701/8. The $^{13}$C-spectra showed the expected signals for the given structure. The $^1$H-NMR results, however, showed the presence of an isomeric mixture. The non-GLP results obtained from different NMR experiments revealed a time-dependent isomerisation of the test item (Z-isomer) to the corresponding E-isomer upon dissolution. The time-dependent investigation yielded equilibrium after ca. 5 hours of an isomeric mixture with a ratio of 1.98: 1.00 for Z-isomer to E-isomer.

The UV filter C-1701 B_C_3 is synthesised as Z-isomer and upon dissolution it isomerises within 5 hours to approximately 60% Z-isomer and ca. 40% E-isomer.

---

**Isomeric structures of the UV filter C-1701 B_C_3 based on 1H- and 13C-NMR signals**

Purity of UV filter C-1701 B_C_3 was determined by quantitative $^1$H-NMR spectroscopy with internal standard on the batches 1442/3+4 and C-1701/8.

The following table summarises the analytical profile of the three batches used in toxicological studies.

**Table 1.**
### Comparative table of the main analytical results for the three batches 1442/3+4, C-1701/8 and 0009511412

<table>
<thead>
<tr>
<th>Aspect</th>
<th>batch 1442/3+4</th>
<th>batch C-1701/8</th>
<th>batch 0009511412</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aspect / Content of Main component B_C_3 by HPLC UV (%)</td>
<td>96.2</td>
<td>97.8</td>
<td>98.7</td>
</tr>
<tr>
<td>1H-NMR spectroscopy (% w/w)</td>
<td>98.8</td>
<td>96.3</td>
<td>Not provided</td>
</tr>
<tr>
<td>Impurities content by HPLC UV</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Content of B_C (area %)</td>
<td>2.22</td>
<td>1.52</td>
<td>1.02</td>
</tr>
<tr>
<td>Sum of other impurities greater than 0.1% (area %)</td>
<td>1.41</td>
<td>0.53</td>
<td>0</td>
</tr>
<tr>
<td>Sum of other impurities lower than 0.1% (area %)</td>
<td>0.2</td>
<td>0.19</td>
<td>0.25</td>
</tr>
<tr>
<td>Other impurities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water content (% w/w)</td>
<td>0.13</td>
<td>0.09</td>
<td>0.07</td>
</tr>
<tr>
<td>2-Ethoxyethanol (ppm)</td>
<td>120</td>
<td>12</td>
<td>&lt;10</td>
</tr>
<tr>
<td>3-methoxypropylamine (ppm)</td>
<td>&lt;500</td>
<td>&lt;500</td>
<td>&lt;500</td>
</tr>
<tr>
<td>Diethylsulfate (ppm)</td>
<td>&lt;1</td>
<td>&lt;1</td>
<td>&lt;1</td>
</tr>
</tbody>
</table>

**SCCS comment**

NMR peak purity for the batch 0009511412 was not provided. The applicant should provide the accurate content of 2-ethoxyethanol, diethylsulfate and 3-methoxypropylamine for all the three batches.

### 3.1.5 Impurities / accompanying contaminants

The impurity determinations were performed by the use of an HPLC-PDA analytical method at $\lambda_{\text{max}}$ with LOD 0.05%. The structure elucidation was done by HPLC-MS. Table 2 contains quantitative information on the main component and impurities above 0.1% and their structure proposals for the three C-1701 B_C_3 samples, which had been derived from HPLC-MS. The contents of 2-ethoxyethanol and 3-methoxypropylamine were determined by means of GC/FID using standard addition method. Diethylsulfate was quantified by means of headspace GC/MS using the standard addition method.
Table 2.
Quantitative information on the main component and impurities above 0.1% and their structure proposals for the three C-1701 B_C_3 samples

<table>
<thead>
<tr>
<th>Retention Time (min)</th>
<th>Approx. Content* (%area@380nm)</th>
<th>MW (Da)</th>
<th>Proposed Structure (and/or isomer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LC/MS</td>
<td>HPLC-DAD</td>
<td>1442/3+4</td>
<td>C-1701/8 0009511412</td>
</tr>
<tr>
<td>8.7</td>
<td>8.0</td>
<td>**</td>
<td>**</td>
</tr>
<tr>
<td>21.8</td>
<td>21.4</td>
<td>&lt;0.05</td>
<td>0.11</td>
</tr>
<tr>
<td>22.6</td>
<td>22.3</td>
<td>&lt;0.05</td>
<td>0.18</td>
</tr>
<tr>
<td>26.1</td>
<td>25.9</td>
<td>2.20</td>
<td>1.57</td>
</tr>
<tr>
<td>26.5</td>
<td>26.3</td>
<td>97.66</td>
<td>98.14</td>
</tr>
<tr>
<td>27.5</td>
<td>27.4</td>
<td>0.12</td>
<td>-</td>
</tr>
</tbody>
</table>

* By-product contents are calculated as described in chapter 3. Methodology
** no UV-detection @380nm, detectable at UV range 280-480 nm and by MS
- not detected by UV and by MS (<0.001)
SCCS comment

The applicant provided HPLC-PDA chromatograms for all three batches: peak purity and impurities have been quantified at $\lambda_{\text{max}}$ of the test substance. According to the applicant, these impurities have been chemically characterised by LC-MS. All area-% results for the impurities in the data tables were calculated from the HPLC-DAD data using a 7 mg/mL test solution. However, the quantification based on HPLC-DAD data has been carried out by calculating the results obtained for the concentrated solutions (7 mg/mL) relative to the peak area of compound B_C of the diluted solution which is not accepted. In addition, the applicant should clearly explain the dilution factor used for the calculation and the linearity range (concentrations) of the test substance.

3.1.6 Solubility

Water solubility: 0.45 g/L at 20\degree C (flask method OECD 105)
Solubility in mineral oil: 0.01 g/L
Solubility in Phenoxyethanol: 318 g/L

For the determination of the solubility of C-1701 B_C_3 in different solvents used for cosmetics the UV filter was weighed in glass vessels and dissolved in the respective cosmetic oil. The mixtures were stirred for 7 days at 25 °C. The solubility data for the UV filter C-1701 B_C_3 in solvents used for cosmetics are summarised in Table 3:

<table>
<thead>
<tr>
<th>Solvent</th>
<th>INCI</th>
<th>Solubility (% w/w)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protectol PE</td>
<td>Phenoxyethanol</td>
<td>31.8</td>
</tr>
<tr>
<td>Spectrasolv DMDA</td>
<td>Dimethyl Capramide</td>
<td>18.6</td>
</tr>
<tr>
<td>Transcutol CG</td>
<td>Ethoxydiglycol</td>
<td>18.3</td>
</tr>
<tr>
<td>Dottisol</td>
<td>Dimethyl Isosorbide</td>
<td>13.9</td>
</tr>
<tr>
<td>Ethanol</td>
<td>Alcohol</td>
<td>13.0</td>
</tr>
<tr>
<td>Pelemol BIP-PC</td>
<td>Butylphthalimide and</td>
<td>9.7</td>
</tr>
<tr>
<td></td>
<td>Isopropylphthalimide</td>
<td></td>
</tr>
<tr>
<td>X-Tend 226</td>
<td>Phenethyl Benzoate</td>
<td>7.8</td>
</tr>
<tr>
<td>Eldew SL-205</td>
<td>Isopropyl Lauroyl Sarcosinate</td>
<td>7.2</td>
</tr>
<tr>
<td>Ronacare AP</td>
<td>Bis-ethylhexyl Hydroxydimethoxy</td>
<td>5.2</td>
</tr>
<tr>
<td></td>
<td>Benzylmalonate</td>
<td></td>
</tr>
<tr>
<td>Uvinul N 539 T</td>
<td>Octocrylene</td>
<td>3.7</td>
</tr>
<tr>
<td>1,2-Propandiol</td>
<td>Propylene Glycol</td>
<td>3.3</td>
</tr>
<tr>
<td>Oxynex ST</td>
<td>Diethylhexyl Syringylidenemalonate</td>
<td>2.7</td>
</tr>
</tbody>
</table>
SCCS/1605/19
Preliminary Opinion

Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Solvent</th>
<th>Concentration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uvinul MC 80</td>
<td>Ethylhexylov methoxycinnamate</td>
<td>2.1</td>
</tr>
<tr>
<td>Tegosoft XC</td>
<td>Phenoxyethyl Caprylate</td>
<td>2.0</td>
</tr>
<tr>
<td>Cetiol B</td>
<td>Dibutyl Adipate</td>
<td>1.9</td>
</tr>
<tr>
<td>Finsolv EB</td>
<td>Ethylhexylov Benzoate</td>
<td>1.7</td>
</tr>
<tr>
<td>Dermofeel TC-7</td>
<td>Triheptanoin</td>
<td>0.58</td>
</tr>
<tr>
<td>Dermofeel BGC</td>
<td>Butylen Glycol/Dicaprylate</td>
<td>0.38</td>
</tr>
<tr>
<td>Cetiol AB</td>
<td>C12-15 Alkyl Benzoate</td>
<td>0.35</td>
</tr>
<tr>
<td>Tegosoft CT</td>
<td>Caprylic/Capric Triglyceride</td>
<td>0.31</td>
</tr>
<tr>
<td>Cetiol CC</td>
<td>Dicaprylyl Carbonate</td>
<td>0.15</td>
</tr>
<tr>
<td>Lanol 99</td>
<td>Isononyl Isononanoate</td>
<td>0.12</td>
</tr>
<tr>
<td>Isopropylpalmitate</td>
<td>Isopepityl Palmitate</td>
<td>0.12</td>
</tr>
<tr>
<td>Jojoba Oil</td>
<td>Jojoba Oil</td>
<td>0.03</td>
</tr>
<tr>
<td>Cetiol OE</td>
<td>Dicaprylyl Ether</td>
<td>0.02</td>
</tr>
<tr>
<td>Cyclomethicone DC345</td>
<td>Cyclomethicone</td>
<td>0.002</td>
</tr>
<tr>
<td>Paraffin oil</td>
<td>Mineral Oil</td>
<td>0.002</td>
</tr>
<tr>
<td>Nexbase 2006 FG</td>
<td>Hydrogenated Polydecene</td>
<td>0.001</td>
</tr>
</tbody>
</table>

Ref.: BASF Grenzach GmbH Data sheet Winkler S. (2013) Siemens AG study number 20120207.06 draft

**SCCS comment**

Solubility in PEG 300 should be provided as this was used for toxicological tests.

### 3.1.7 Partition coefficient (Log P<sub>ow</sub>)

Log P<sub>ow</sub>: 1.7 under neutral and alkaline conditions (OECD 117, EEC A.8, GLP)

Ref.: Winkler S. (2013), Siemens AG study number 20120207.02

### 3.1.8 Additional physical and chemical specifications

Melting point: 85 -120 °C.
Boiling point: 306- 315 °C
Flash point: 394 °C
Flammability: not flammable
Explosive properties: not explosive
Particle size: D<sub>0.1</sub>= 0.858 µm, D<sub>0.5</sub>= 1.236 µm, D<sub>0.9</sub>= 2.942 µm. The test substance does not contain nanomaterial.
Thermal stability: Decomposition at 390 °C
Vapour pressure: /
Density: /
Viscosity: /
pKa:13.3
Refractive index: /
pH: 5.8/5.9 in a 1 % of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate solution in water
UV-vis: λ<sub>max</sub> = 385 nm

Ref.: Giesinger J. (2013), BASF Grenzach GmbH study number GIJ-Malv-Rec610
Winkler S. (2013), Siemens AG study number 20120207.01
Winkler S. (2013), Siemens AG study number 20120207.02
3.1.9 Stability

The characterisation of the batches used for toxicological studies showed the homogeneity of test items. Batch C-1701 B_C_3 Lot 0009511412 was stable after being stored for 1 year at 40 °C. Neither active ingredient content nor the content and identity of impurities changed over the considered time interval.

Table 4.

<table>
<thead>
<tr>
<th>Test point</th>
<th>Measurements performed after synthesis (“time zero”)</th>
<th>Measurements performed after 1 year storage at 40°C</th>
<th>Principle of Analytical Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Content of main component B_C_3</td>
<td>98.83 area%</td>
<td>98.73 area%</td>
<td>HPLC/UV</td>
</tr>
<tr>
<td>Content of B_C (Mw = 278)</td>
<td>0.93 area%</td>
<td>1.02 area%</td>
<td>HPLC/UV</td>
</tr>
</tbody>
</table>

Homogeneity and stability of C-1701 B_C_3 in toxicological test systems (PEG 300) were confirmed in dose formulation analyses conducted as part of e.g. the repeated dose toxicity studies.


SCCS comments on physicochemical characterisation

Impurities should be quantified for all the batches at $\lambda_{max}$, retention times and HPLC-PDA chromatograms should be provided.

HPLC-MS chromatograms showing the retention time of the main compound and all the impurities, along with information on the % content and retention times of these impurities should be provided.

The applicant should provide the accurate content of 2-ethoxyethanol and 3-methoxypropylamine of all the three batches.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

Solubility in PEG 300 should be provided.
3.2 Function and uses

S87 is proposed to be used as a UV filter in personal care products, including sunscreen cosmetic formulations at a maximum concentration of 3% w/w.

3.3 Toxicological Evaluation

3.3.1 Acute toxicity

No acute toxicity study was performed on C-1701 B_C_3. However, in the existing 14-day and 90-day oral toxicity studies where C-1701 B_C_3 was administered at dose levels of 100, 300 and 1000 mg/kg/d in rats, C-1701 B_C_3 did not induce any deaths. Hence, it can be assumed that the oral LD50 would be higher than 1,000 mg/kg/d (i.e. the substance is of low acute oral toxicity).

3.3.2 Irritation and corrosivity

3.3.2.1 Skin irritation

**EpiDerm™ Skin Irritation Test**

| Test system: | EpiDerm™ model (0.6 cm²) |
| Replicates: | 3 tissues per condition |
| Test substance: | C-1701 B_C_3 No. 11/0473-3 |
| Test batch: | C-1701/8 |
| Purity: | 96.3% (HPLC) |
| Dose: | 25 µl bulk volume (approximately 7 mg) of neat test substance upon tissue wetted with 25 µl phosphate-buffered saline (PBS) |
| Treatment period: | 60 minutes |
| Post-treatment incubation time: | 42 hours |
| Positive control: | 5% (w/v) SDS in deionised water |
| Negative control: | PBS |
| Direct interaction with MTT: | Negative |
| Colouring of tissue: | Yes |
| GLP: | In compliance |
| Study period: | July - August 2012 |

**Methods**

A bulk volume of 25µl of the solid test material (about 7 mg) was applied onto each of three tissues, wetted with 25µL of PBS, and homogenously distributed. Control tissues were treated with 30 µl of either the negative control (PBS) or positive control (5% w/v SDS). After 60-minutes treatment (25 minutes at room temperature and 35 minutes in the incubator), the tissues were rinsed with PBS. Following a 42-hour post-treatment incubation period, cell viability was assessed by the MTT assay in which 300 µl of MTT solution was added to the tissues. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol. The optical density was determined spectrophotometrically at 570 nm (OD570).

**Results**
The mean viability of the test item-treated tissues was 101%. Yellow discoloration of the tissues was observed after washing. The positive control item demonstrated appropriate sensitivity (relative viability ≤ 20%) of the tissues used under test conditions.

Table 5.

<table>
<thead>
<tr>
<th>Group</th>
<th>Relative viability (mean ± SD, n = 3), [% NC]</th>
</tr>
</thead>
<tbody>
<tr>
<td>NC (PBS)</td>
<td>100 ± 1.31</td>
</tr>
<tr>
<td>C-1701 B_C_3 (batch: C-1701/8)</td>
<td>101 ± 20.85\textsuperscript{a}</td>
</tr>
<tr>
<td>PC (5% w/v SDS)</td>
<td>3 ± 0.25</td>
</tr>
</tbody>
</table>

\textit{n}: number of samples, NC: negative control, PBS: Phosphate buffered saline, PC: positive control, SD: standard deviation, SDS: Sodium dodecyl sulfate

\textit{a}: This SD was out of the acceptance limit of ≤ 20. Since all other quality criteria of the test were met and the viability values were well above the cut off for skin irritation, \textit{i.e.} ≤ 50%, this deviation was not considered to adversely affect the results of this study.

**Conclusion**

The study authors conclude that, under the conditions of this \textit{in vitro} study, C-1701 B_C_3 did not show a skin irritation potential in the EpiDerm™ skin irritation test. On the basis of this validated stand-alone \textit{in vitro} test, C 1701 B_C_3 is not expected to be irritating to skin at the use concentration and undiluted.

Ref.: Wareing B. (2012), BASF SE study number 61V0473/11A562

**SCCS comment**

According to OECD TG 439 (2010) a minimum of 25 mg/cm\textsuperscript{2} should be used in case of solid chemicals. In the study provided, an amount of 7 mg/0.6 cm\textsuperscript{2} or 11.67 mg/cm\textsuperscript{2} of test substance was used i.e. far below the recommended 25 mg/cm\textsuperscript{2}. In addition, a high variability between sample tissues was observed with a standard deviation between tissue replicates of 20.85, exceeding the recommended maximum acceptable variability of SD<18. Due to these shortcomings, SCCS considers that a skin irritation potential of C 1701 B_C_3 cannot be excluded.

**3.3.2.2 Mucous membrane irritation / Eye irritation**

**Bovine corneal opacity and permeability test (BCOP test)**

- **Guideline:** OECD 437 (2009), Commission Regulation (EU) No 1152/2010, B.47
- **Test system:** Fresh bovine corneas
- **Replicates:** 3 Corneae per test condition
- **Test substance:** C-1701 B_C_3 No. 11/0473-3
- **Test batch:** C 1701/8
- **Purity:** 96.3% (HPLC)
- **Test item:** 20% (w/v) suspension in deionized water
- **Test volume:** 750µl
- **Treatment period:** 4 hours at about 32 °C
- **Positive control:** 20% (w/v) imidazole in deionised water
- **Negative control:** Deionised water
GLP: In compliance
Study period: July - August 2012

Methods
Freshly isolated bovine eyes from 12-16 month old donor cattle were collected from the slaughterhouse and examined for defects. Those presenting defects such as opacity, scratches, pigmentation etc. were discarded. The corneae were carefully removed from the eyes and mounted in a holder. After a first basal opacity measurement of the fresh bovine corneae, 750 µl of the test item, the positive and the negative controls were applied onto the corneae and incubated for 4 hours at about 32 °C. After the incubation phase, the test item, the positive and the negative controls were each rinsed from the corneae and the opacity was measured again. Thereafter, permeability of the corneae was determined by measuring spectrophotometrically at 490 nm the transfer of 0.5% (w/v) sodium fluorescein upon incubation in a horizontal position for 90 minutes at about 32 °C.

Results
The IVIS value of C 1701 B_C_3 did not indicate a test item-related risk of serious damage to eyes. The PC item demonstrated appropriate sensitivity (IVIS value within 2 SD of the laboratory’s historical mean value, i.e. 87.7-144.2) of the test system.

Table 6.

<table>
<thead>
<tr>
<th>In vitro irritancy score (IVIS) for C-1701 B_C_3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group</td>
</tr>
<tr>
<td>C-1701 B_C_3 (20% aqueous solution)</td>
</tr>
<tr>
<td>Mean opacity (± SD; n = 3)</td>
</tr>
<tr>
<td>5.5 ± 1.6</td>
</tr>
<tr>
<td>Mean permeability (± SD; n = 3)</td>
</tr>
<tr>
<td>- 0.004 ± 0.002</td>
</tr>
<tr>
<td>IVIS (± SD; n = 3)</td>
</tr>
<tr>
<td>5.4 ± 1.6</td>
</tr>
<tr>
<td>NC (deionised water)</td>
</tr>
<tr>
<td>1.5 ± 3.2</td>
</tr>
<tr>
<td>Mean permeability (± SD; n = 3)</td>
</tr>
<tr>
<td>0.201 ± 0.358</td>
</tr>
<tr>
<td>IVIS (± SD; n = 3)</td>
</tr>
<tr>
<td>4.5 ± 3.9</td>
</tr>
<tr>
<td>PC (20% w/v imidazole)</td>
</tr>
<tr>
<td>72.2 ± 6.4</td>
</tr>
<tr>
<td>Mean permeability (± SD; n = 3)</td>
</tr>
<tr>
<td>3.847 ± 0.959</td>
</tr>
<tr>
<td>IVIS (± SD; n = 3)</td>
</tr>
<tr>
<td>129.9 ± 16.4</td>
</tr>
</tbody>
</table>

n: number of samples, NC: negative control, PC: positive control, SD: standard deviation

Conclusion
The study authors conclude that, under the conditions of this study, C-1701 B_C_3 does not cause serious eye damage.

Ref.: Remmele M. (2012), BASF SE study number 63V0473/11A563

SCCS comment
SCCS notes that due to an outlier, negative control values were not within the historical range. Consequently, negative control corrections for permeability and opacity measurements were not performed for results obtained for the positive control and the test substance. Based on the unambiguous results of the study, even without background corrections, the SCCS has accepted that C-1701 B_C_3 does not cause serious eye damage. However, a mild or moderate eye irritation potential cannot be excluded.

EpiOcular™ eye irritation test

Test system: EpiOcular™ human cornea model (0.6 cm²)

Replicates: 2 tissues per condition

Test substance: C-1701 B_C_3 No. 11/0473-3

Test batch: C-1701/8

Purity: 96.3% (HPLC)

Dose: 50 µl bulk volume (approximately 8 mg) neat test substance upon tissue wetted with 20 µl PBS

Treatment period: 90 minutes

Post-treatment incubation time: 18 hours

Positive control: Methyl acetate

Negative control: Deionised water

Direct interaction with MTT: Negative

Colouring of tissue: Yes

GLP: In compliance

Study period: July - August 2012

Methods

Approximately 8 mg test item was applied onto the tissues, which were wetted with 20 µl PBS and incubated for 30 minutes. In parallel, 50 µl of the negative and positive control were handled in the same manner. The treated tissues were placed in the incubator for 90 minutes. After incubation, the tissues were rinsed with PBS to remove any residual test material and incubated for another 18 hours at standard culture conditions. Cell viability was next measured with the MTT assay. Here the medium was replaced by 300 µl of MTT solution. After a 3-hour incubation period, the MTT solution was removed and the tissues were washed with PBS. The formed formazan was extracted by incubation of the tissues in isopropanol at room temperature overnight or for at least 2 hours on a plate shaker. The optical density was determined spectrophotometrically at 570 nm (OD570).

Results

The mean viability of the test item-treated tissues was 104%, determined after an exposure period of 90 minutes with about 18 hours post-incubation. Yellow discoloration of the tissues was observed after washing. The positive control item demonstrated appropriate sensitivity (relative viability < 50%, expected tissue viability of approximately 25%) of the tissues used under test conditions.

Table 7.

<table>
<thead>
<tr>
<th>Group</th>
<th>Relative viability</th>
<th>Inter-tissue variability [%]</th>
</tr>
</thead>
<tbody>
<tr>
<td>NC (water)</td>
<td>Mean (n = 2) [% of NC]</td>
<td>8.7</td>
</tr>
<tr>
<td>C-1701 B_C_3 (batch: C-1701/8) 100%</td>
<td>104</td>
<td>0.7</td>
</tr>
<tr>
<td>PC (Methyl acetate)</td>
<td>16</td>
<td>0.9</td>
</tr>
</tbody>
</table>

n: number of samples, NC: negative control, PC: positive control
Conclusion
The study authors conclude that, under the experimental conditions employed, C-1701 B_C_3 did not show an eye irritation potential.

Ref.: Wareing B. (2012), BASF SE study number 62V0473/11A564

SCCS comment
This study was performed prior to the acceptance of the official OECD TG 492 guideline for the EpiOcular™ test. However, an amount of 8 mg/0.6 cm² or 13.33 mg/cm² of C-1701 B_C_3 was applied on the tissue surface, being too low to accurately predict eye irritation potential. Due to these shortcomings, SCCS considers that the potential of C-1701 B_C_3 to be irritating to the eye cannot be excluded.

3.3.3 Skin sensitisation

Non-Radioactive Murine Local Lymph Node Assay (LLNA)

Guideline: OECD 442B (2010),
Species/strain: Female CBA/J mice
Group size: 2 animals/group (pre-test); 5 animals/group (main test)
Test substance: C-1701 B_C_3
Batch: 1442/3+4
Purity: 100 area-% (HPLC)
Vehicle: N,N-dimethylformamide (DMF)
Concentration: 10, 25 and 50 w/v%
Positive control: 25 vol % α-hexyl cinnamic aldehyde (HCA)
GLP: In compliance
Study period: October 2011 - January 2012

Methods
The concentrations used for the main test were based on a preliminary study using concentrations of 10, 25 and 50% (w/v), in which no clinical signs and no appreciable changes in body weights or auricular thickness were noted.

The test item was applied once daily at concentrations of 10, 25 and 50% to the outside of both ears (25 μL/ear for three consecutive days (days 1-3). Concurrent vehicle (DMF) and positive control items (25% (v/v) HCA in DMF were applied in the same manner. On day 5, Bromodeoxyuridine (BrdU) was administered intraperitoneally (i.p.) to all animals at a dose level of 5 mg/animal. All animals were sacrificed on day 6. The ears were observed and scored for erythema and/or edema. Then the auricular lymph nodes were excised for lymph node weight determination and for subsequent assessment of BrdU incorporation by means of flow cytometry. The number of BrdU-positive cells was calculated for each animal by multiplying the lymphocyte count by the ratio of BrdU-positive lymphocytes and the stimulation index (SI) was calculated for each treated group.

Results
No clinical signs, including skin irritation at the application area, were observed in any animal in the test item-treated or vehicle control group. No appreciable body weight changes were observed. In the positive control group, very slight erythema was observed in both ear auricles of all animals at approximately 1 hour after application on days 2 and 3 only.
The SI values were 1.1, 1.0 and 1.0 in the low-, mid- and high-dose groups (10, 25 and 50% (w/v)), respectively. Relevant increases in the ratio and count of BrdU-positive lymphocyte cells were noted in the Positive control group as compared to the Vehicle control group. The SI value in the Positive control group was 7.4, indicating a positive response and an adequate sensitivity of the test system.

**Conclusion**

Based on the study results, C-1701 B_C_3 in N,N-Dimethylformamide was considered not to possess any skin sensitising potential under the experimental conditions employed. Therefore, C-1701 B_C_3 is not considered to be a skin sensitisier.

Ref.: Matsuda A. (2012), BASF project number 58V0473/11X188

**SCCS comment**

The LLNA:BrdU-ELISA uses a different cut-off than the traditional LLNA. In this non-radioactive LLNA, a substance is considered a skin sensitiser when the SI $\geq 1.6$ (OECD TG442B). However, using this criterion, C-1701 B_C_3 can still be regarded as having no skin sensitisation potential.

### 3.3.4 Toxicokinetics

#### 3.3.4.1 Dermal / percutaneous absorption

**In vitro percutaneous absorption**

| Test system: | Split thickness human skin samples (200-400 µm) |
| Number of donors: | 12 samples from 4 donors (25 to 48 years) |
| Membrane integrity: | Electrical resistance barrier integrity test, membranes with a resistance $< 4 \, k\Omega$ were excluded |
| Test substance: | C-1701 B_C_3 |
| Batch: | C-1701/8 |
| Purity: | 96.3% (NMR) |
| Test item: | Commercial suncare formulation 758455 5, batch no. R2, containing 3% (w/w) C-1701 B_C_3 |
| Dose applied: | 2 mg/cm$^2$ of the test preparation (approx. 0.06 mg C-1701 B_C_3/cm$^2$, total dose approx. 0.19 mg) |
| Exposed area: | 3.14 cm$^2$ |
| Exposure period: | 24 hours |
| Sampling period: | 24 hours (0, 0.5, 1, 2, 4, 8 and 24 hours post dose) |
| Receptor fluid: | 5% w/v bovine serum albumin in PBS |
| Solubility in receptor fluid: | 0.207 mg/mL |
| Mass balance analysis: | Provided |
| Tape stripping: | Yes (20 strips in total; 4 pools of 5 strips each) |
| Method of Analysis: | LC-MS/MS |
| GLP: | In compliance |
| Study period: | December 2012 - January 2013 |
Methods

Split-thickness human skin (12 samples from 4 individual donors) was mounted into static diffusion cells containing receptor fluid (Phosphate buffered saline (PBS) supplemented with bovine serum albumin (BSA); 5% w/v) in the receptor chamber. The skin surface temperature was maintained at 32 ± 1 °C throughout the experiment. An electrical resistance barrier integrity test was performed and any human skin sample exhibiting a resistance < 4 kΩ was excluded from absorption measurements. No samples were rejected. The sunscreen formulation was applied to the mounted human skin samples at an application rate of approximately 2 mg/cm². This quantity, as low as technically applicable, can be considered as a good representation of the use conditions.

The skin surface temperature was maintained at 32 ± 1 °C throughout the experiment. Exposure was terminated at 24 hours post dose by washing the skin surface rinsed twice with an aqueous solution of Sodium dodecyl sulfate (SDS, 2% w/v) and then twice with water, to reflect in-use conditions. For each washing step, the skin wash was aspirated with a pipette and the skin was dried with a tissue-paper swab. An additional tissue-paper swab was used after the last water rinse. The soap and water were retained for analysis in a single pooled sample (skin wash). The pipette tips and tissue-paper swabs were retained. The cells were dismantled and the donor chamber retained for analysis (donor chamber wash). The underside of the skin was dried with additional tissue swabs. The receptor chambers were emptied, and bulk receptor fluid retained. The chambers were rinsed with methanol (40 mL) and the wash retained (receptor wash). The skin was divided into exposed skin and unexposed skin (i.e. the area of skin under the cell flange). The stratum corneum was removed from the skin by tape stripping. Afterwards, the epidermis was separated from the dermis by the heat separation technique. Exposed skin, unexposed skin, skin washes, tissue swabs, pipette tips and tape strips were extracted in a suitable solvent and all samples were analysed by LC-MS/MS. All cumulative receptor fluid values were calculated from data which included values less than the lower limit of quantification (LLOQ, 1 ng/mL). Any receptor fluid value below the LLOQ was assigned the nominal value of the LLOQ (1 ng/mL), representing the “worst-case” result for absorbed test item. Values below the LLOQ were observed up to 2-4 hours post dose. The solubility of the test item in the receptor fluid was not rate limiting for absorption.

Results

The distribution and the absorption of the test item are summarised in the following table 8.

<table>
<thead>
<tr>
<th>Distribution/absorption of C-1701 B_C_3 (batch: C-1701/8) 24 hours after application in a typical sunscreen formulation (3% w/w) to split-thickness human skin</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Distribution</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Distribution</strong></td>
</tr>
</tbody>
</table>
Distribution/absorption of C-1701 B_C_3 (batch: C-1701/8) 24 hours after application in a typical suncare formulation (3% w/w) to split-thickness human skin

<table>
<thead>
<tr>
<th>Distribution</th>
<th>Fraction of applied dose mean ± SD (n = 12) [%]</th>
<th>Amount mean ± SD (n = 12) [µg/cm²]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total dislodgeable dose</td>
<td>93.73 ± 5.48</td>
<td>61.79 ± 3.61</td>
</tr>
<tr>
<td>Stratum corneum</td>
<td>0.79 ± 0.46</td>
<td>0.52 ± 0.30</td>
</tr>
<tr>
<td>Epidermis (without stratum corneum)</td>
<td>0.57 ± 0.48</td>
<td>0.37 ± 0.32</td>
</tr>
<tr>
<td>Dermis</td>
<td>0.35 ± 0.41</td>
<td>0.23 ± 0.27</td>
</tr>
<tr>
<td>Total unabsorbed dose</td>
<td>94.71 ± 5.06</td>
<td>62.44 ± 3.34</td>
</tr>
<tr>
<td>Total absorbed dose</td>
<td>0.72 ± 0.63</td>
<td>0.48 ± 0.42</td>
</tr>
<tr>
<td>Dermal delivery</td>
<td>1.63 ± 1.02</td>
<td>1.08 ± 0.67</td>
</tr>
<tr>
<td>Mass balance</td>
<td>96.34 ± 4.57</td>
<td>63.51 ± 3.01</td>
</tr>
</tbody>
</table>

1: nominal concentration; a test item concentration of 3.23% (w/w) was determined by LC-MS/MS
2: number of samples, SD: standard deviation
3: Total dislodgeable dose: donor chamber wash + skin wash + tissue swabs + pipette tips
4: Total unabsorbed dose: total dislodgeable dose + stratum corneum + unexposed skin
5: Total absorbed dose: cumulative receptor fluid + receptor rinse + receptor chamber wash
6: Dermal delivery: total absorbed dose + dermis + epidermis (without stratum corneum);
7: Mass balance: total unabsorbed dose + epidermis (without stratum corneum) + dermis + total absorbed dose

Conclusion

Under the conditions of this in vitro study, C-1701 B_C_3 in a representative suncare cosmetic formulation at the concentration of 3% (w/w) penetrated through split-thickness human skin to a low extent. At 24h post dose, the amount considered as absorbed was estimated to be at maximum 1.08 ± 0.67 µg/cm² corresponding to 1.63 ± 1.02% of the applied dose.

Ref.: Blackstock C. (2013), Charles River Laboratories study number 792670

SCCS comment

The dermal absorption study was performed adequately. The SCCS has therefore decided to use the mean +1SD (1.63%+1.02=2.65% or 1.08+0.67 µg/cm²=1.75 µg/cm²) for MoS calculations.

3.3.4.2 Other studies on toxicokinetics

3.3.5 Repeated dose toxicity

3.3.5.1 Repeated Dose (28 days) oral / dermal / inhalation toxicity

Repeated Dose (14 days) oral toxicity

Guideline: /
Animals received test substance for 14 days. During the treatment period all animals were assessed repeatedly for mortality and clinical signs of toxicity. Body weights and food consumption were recorded at regular intervals. On the day of scheduled necropsy, urine samples were collected after overnight fasting and blood samples were taken for the assessment of haematology and clinical chemistry parameters. At necropsy, all animals were examined macroscopically and selected organ weights were determined. Organs/tissues of all high dose group and control group animals were processed and examined microscopically for histopathological findings. The dose formulations used in this study were analysed for test item concentration and homogeneity.

**Results**

Stability analyses demonstrated that the test item is stable in PEG 300 at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 °C) and protected from light for 10 days at concentrations bracketing those used in the present study. All dose formulations used in this study were formulated appropriately and remained within the concentration acceptance criterion (i.e., difference between analytically determined mean concentration and nominal concentration ≤ 15%). Homogeneity testing showed that the formulation technique used produced homogenous dose formulations.

No mortalities and no toxicologically relevant test item-related changes in haematology, clinical chemistry and urinalysis parameters were observed. Except for the liver, no relevant test item-related changes in organ weights were noted on the day of scheduled necropsy. Macroscopical and histopathological examinations revealed no adverse test item-related gross lesions or microscopic findings in both male and female rats. Treatment of male rats with the test item resulted in clinical signs (discoloured fur, mild to moderate dehydration, mild to moderate excess salivation, hunched posture, rales, decreased motor activity, swelling in the axillary region and ptosis), reductions in body weight gain and food consumption, and increased liver weights at the high-dose level of 1000 mg/kg bw/day. Females at the same dose level showed clinical signs (discoloured fur, mild dehydration, urine-stained abdominal fur and chromorhinorrhea) and increased liver weights. Increased liver weights were also seen in females treated at 300 mg/kg bw/day.

In the absence of concomitant macroscopical and histopathological findings, the increased liver weights noted in both sexes at 1000 mg/kg bw/day and in females also at 300 mg/kg bw/day were not considered adverse.

**Conclusion**

Under the conditions of this dose range-finding toxicity study, the NOAEL for C-1701 B_C_3 was established at 300 mg/kg bw/day for male and female rats. Dose levels of 100, 300 and 1000 mg/kg bw/day were selected for the subsequent 90-day repeated dose oral toxicity study in rats.

Ref.: Carlson M.B. (2013), BASF project number 99C0284/11X221
SCCS/1605/19
Preliminary Opinion
Opinion on Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) - Submission II

SCCS comment
A dose level of 1000 mg/kg body weight/day in C-1701 produced general toxicity in the form of clinical signs (discoloured fur, dehydration, urine-stained abdominal fur and chromorhinorrhrea, excess salivation, hunched posture, rales, decreased motor activity, swelling in the axillary region and ptosis), reductions in body weight gain and food consumption, and increased liver weights indicating that this dose is an appropriate maximum tolerated dose (MTD) for subsequent studies.

3.3.5.2 Sub-chronic (90 days) oral / dermal / inhalation toxicity

Oral

Guideline: OECD 408; US EPA OPPTS 870.3100
Species/strain: Wistar (Crl:WI(Han)) rats
Group size: 10 /sex/group

Test substance: C-1701 B_C_3
Batch: C-1701/8
Purity: 96.3% (1H-NMR)
Vehicle: Polyethylene glycol 300
Dose levels: 0, 100, 300 or 1000 mg/kg bw/day
Dose volume: 5 mL/kg bw
Route: oral
Administration: gavage
Duration: 90 days
GLP: in compliance
Study period: May 2012- May 2013 (in life phase ended August 2012)

During the treatment period, animals were observed for mortality, general clinical observations, detailed observations, body weight and food consumption at defined intervals. Functional observation battery (FOB) and locomotor activity assessments were performed in week 12. Vaginal lavage samples were collected daily for the last 28 days of the treatment period and on the day of scheduled necropsy for estrous cycle evaluations. Ophthalmological examinations were conducted on all animals, once during the acclimatisation period and once prior to scheduled necropsy. Blood samples for clinical pathology examinations, haematology and clinical chemistry parameters were collected on the day of scheduled necropsy from all rats after an overnight fasting period. For the assessment of urinalysis parameters, only urine from female animals (obtained after overnight fasting on the day of necropsy) was taken. On the day of scheduled necropsy, all animals were examined macroscopically and the weights of selected organs were determined. Full histopathology was performed on the preserved organs/tissues of all premature decedents and of the animals of the control and high dose groups. Due to lesions observed in high-dose group animals, the liver was also examined microscopically in low- and mid-dose group animals. All gross lesions of all animals were examined. Male reproductive assessments were conducted including sperm motility, sperm concentration, sperm morphology and spermatid counts. The dose formulations used in this study were analysed for test-item concentration and homogeneity using a validated HPLC method. Stability analyses demonstrated that the test item is stable in PEG 300 at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8°C) and protected from light for 10 days at concentrations bracketing those used in the present study.

Results
Analysis of the dose formulations used in this study revealed all actual concentrations were within the acceptance criteria of ± 15% of the nominal concentrations. All dose formulation
samples met acceptance criteria for homogeneity (the relative standard deviation [RSD] of concentrations was < 5% for each group).

Daily test item administration at 1000 mg/kg bw/day resulted in clinical signs, consisting of urine-stained abdominal fur, increased incidence of dehydration and excess salivation. Body weight gains were slightly lower in males as compared with concurrent controls. After the start of the study, food consumption was slightly and transiently decreased in males and females. The bilirubin test in urine was positive for the female rats. Haematological and clinical chemistry examinations mainly revealed slight decreases in red blood cell parameters (haemoglobin concentration and haematocrit in males, mean corpuscular haemoglobin concentration (MCHC) in females, mean corpuscular haemoglobin (MCH) and mean corpuscular volume (MCV) in both sexes) and increased reticulocyte counts and bilirubin concentrations in both sexes. Leukocyte and lymphocyte counts were slightly increased in the female rats. Liver weights were moderately increased in males and females, with minimal centrilobular hepatocellular hypertrophy as histopathological correlate noted in 5/10 males and 8/10 females. There were statistically significant changes in other organ weights, but no patterns, trends, or associated microscopic findings to identify them as being toxicologically relevant. Slightly lower testicular spermatid count and spermatid density occurred in the male rats; however, these differences were not considered to be adverse because there were no corresponding reductions in absolute testicular weights and no microscopic correlations in testicular histology.

At 300 mg/kg bw/day, urine-stained abdominal fur and increased incidence of dehydration were noted in males and females. Minor differences occurred in single haematology parameters, but without consistency across genders. The bilirubin test in urine was positive for the female rats. These findings were not considered adverse. Liver weights were slightly increased in both sexes, but without any histopathological correlates or any evidence of an impaired organ function by clinical chemistry parameters. Therefore, these liver weight changes were not considered adverse, but to be a test item-related adaptive response.

Following test item administration at 100 mg/kg bw/day, dehydration was observed in 3/10 females and the bilirubin test in the urine was positive in female rats. In the absence of any other effects, these differences from controls were not considered to be adverse. No test item-related effects were observed in the male rats.

Conclusions

Under the conditions of this study, the No Observed Adverse Effect Level (NOAEL) for C-1701 B_C_3 was established at 300 mg/kg bw/day for male and female rats. C-1701 B_C_3 was found to be of low toxicity and no adverse effects on male/female reproductive organs have been observed after repeated administration for 90 days via gavage.

Ref.: Carlson M.B. (2013), BASF project number 50C0473/11X497

SCCS comment

Administration of C-1701 B_C_3 by oral gavage to rats once a day for 90 days at a dose of 1000 mg/kg/day resulted in no test article-related gross findings, although liver weight changes with associated microscopic liver findings (centrilobular hypertrophy) and modifications in haematological parameters were observed. There were statistically significant changes in other organ weights, but there were no patterns, trends or associated microscopic findings to identify them as being toxicologically relevant. Administration of C-1701 B_C_3 by oral gavage to rats once a day for 90 days at a dose of 100 or 300 mg/kg/day resulted in no test article-related gross findings. Organ weight changes in liver (increased) only in females at the 300 mg/kg/day dose level but there were no microscopic findings in the liver. Therefore SCCS agrees with the NOAEL of 300 mg/kg/day.
3.3.5.3 Chronic (> 12 months) toxicity

3.3.6 Reproductive toxicity

3.3.6.1 Fertility and reproduction toxicity

Reproduction/developmental screening study in rats

Guideline: OECD 421; US EPA OPPTS 870.3550
Species/strain: Rat/Crl:WI(Han)
Group size: 10/sex/dose (a total of 80 rats)
Test substance: C-1701 B_C_3 suspended in polyethylene glycol 300
Batch: C-1701/8
Purity: 96.3% (1H-NMR); dose calculations were not corrected for purity
Dose levels: 0, 100, 250 or 700 mg/kg bw/day
Dose volume: 5 mL/kg bw
Route: Oral
Exposure period: 14 days prior to cohabitation, through cohabitation, and continuing through the day before necropsy for male rats or through day 4 of lactation (DL4) for females rats that delivered a litter.
GLP: in compliance
Study period: June 2012-May 2013 (in life phase ended August 2012)

This screening study was designed to provide initial information on possible effects on reproduction and/or development, either at an early stage of assessment of toxicological properties of a compound. This test was not designed to provide complete information on all aspects of reproduction and development.

The choice of tested doses was based on a range-finding maternal toxicity study (Carlson M.B. (2013), CRL study number 20027339) in pregnant Crl:WI(Han) female rats at dose levels of 0 (vehicle control), 100, 300 and 1000 mg/kg bw/day on gestation days 6-20. In this range-finding study, clinical signs such as urine-stained abdominal fur, slight to moderate excess salivation and ungroomed coat occurred in a generally dose-dependent manner in each of the dose groups. Additionally, dehydration, piloerection, discolored urine, soft or liquid feces, hunched posture, scant feces, decreased motor activity, and discolored fur occurred in the 300 and/or 1000 mg/kg bw/day whereas ptosis, thin body condition, and hyperpnoea occurred in a single rat at 1000 mg/kg bw/day. Maternal body weights/changes, food consumption, gravid uterine weights and terminal body weights were reduced and absolute and relative liver weights were increased in the 1000 mg/kg bw/day group. On the basis of the observed effects, the dose level of 700 mg/kg bw/day was expected to produce maternal toxicity.

Dose formulation and control substance, PEG 300, were administered for 14 days prior to cohabitation, throughout cohabitation and continuing through the day before necropsy for male rats or through day 4 of lactation (DL4) for female rats that delivered a litter. Female rats that did not deliver a litter were euthanised on an estimated day 25 of gestation (DG 25).

A complete necropsy was performed in the main study on all parental (P) generation rats, and selected tissues were weighed, retained and processed for histopathological examination. All surviving filial (F1) generation pups were euthanised on postnatal day 5 (PND 5), and examined for gross lesions. In this study, mortality (P and F1 generations),
clinical signs (P and F1 generations), body weights (P and F1 generations), feed consumption, estrous cyclicity, mating and fertility parameters, natural delivery, litter observations, macroscopic findings (P and F1 generations), selected organ weights and microscopic findings (incl. sperm staging in males) were assessed.

Dose formulation samples were collected for concentration and homogeneity analysis by means of a HPLC method. Stability analyses were performed and demonstrated that the test item is stable in the vehicle at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8 °C) and protected from light for 10 days at concentrations bracketing those used in the present study.

Results
Analysis of dose formulation samples revealed accurate preparation. The test item was homogeneously distributed in the vehicle.

Administration of the test item at dose levels of 100, 250 and 700 mg/kg bw once daily by oral gavage resulted in urine-stained abdominal fur in male and female rats. Mean body weight gains were slightly decreased (53% of the control group mean value) during the first week of study (days 1-8) in parental (P) generation male rats at 700 mg/kg bw/day. In P generation female rats at the same dose level, mean body weight gains were slightly decreased (83% of the control group mean value) throughout the overall gestation period (gestation days 0-20). Mean food consumption values were slightly decreased (90 to 88% of the control group mean value) during the first week in P generation male and female rats and the first week of pregnancy (gestation days 0-7; 93 to 92% of the control group mean value) in female rats at 700 mg/kg bw/day.

There were no test item-related effects on estrous cycle, mating and fertility parameters, gestation and lactation. Reproductive organ weights were not altered by the administration of the test item.

Mean pup weights per litter on DLs 1 and 5 were slightly reduced (9 and 14% reduction, relative to control group mean values, respectively) in the 700 mg/kg bw/day group (reflecting decreased body weight change in P generation females during gestation (17% reduction, relative to the control group mean value) and also the slightly higher mean litter size (11.2 versus 10.4 in the control group)). It is known from literature (Fleeman et al., 2005) that reductions in fetal body weights frequently occur concurrent with reduced maternal food consumption and maternal body weights, as seen in the current study results.

Histopathological examinations did not reveal any test item-related effects. There were no adverse clinical signs or gross lesions in the F1 generation pups attributed to administration of the test item to the P generation dams.

Conclusion
Under the conditions of this study, the NOAEL for parental toxicity of C-1701_B_C_3 was considered to be 250 mg/kg bw/day given the signs observed at the highest tested dose (urine-stained abdominal fur, mean body weight gains and slightly decreased mean food consumption values).

The NOAEL for reproductive toxicity was considered to be 250 mg/kg bw/day, based on the reductions in mean pup weights per litter at 700 mg/kg bw/day, which were probably related to maternal toxicity, as the reductions in pup weights were concurrent with decreased maternal body weights and a slightly higher litter size. Further, these reductions in mean pup weights per litter were not observed in the lower dose groups, where evidence of maternal toxicity was not apparent.
Based on the study results, C-1701 B_C_3 did not display adverse effects on reproduction parameters.

Ref.: Carlson M.B. (2013), CRL study number 20027339 (range-finding study)
Carlson M.B. (2013), Charles River Laboratories study number 20027631, BASF project number 80R0473/11X498

SCCS comment
SCCS agrees with a NOAEL of 250 mg/kg bw/day for the parental toxicity as well as for the reproductive toxicity.

### 3.3.6.2 Developmental toxicity

**Guideline:** OECD 414

**Species/strain:** Rat/ CrI:WI(Han)

**Group size:** 25 pregnant female rats/group (a total of 100 rats)

**Test substance:** C1701 B_C_3

**Batch:** C-1701/8

**Dose levels:** 0, 100, 250 and 700 mg/kg bw/day on GDs 6-20

**Dose volume:** 5 mL/kg bw

**Route:** Oral gavage

**Exposure period:** from gestation day 6 to gestation day 20

**Positive control:**

**GLP:** In compliance

**Study period:** April 2012- May 2013 (in life phase ended August 2012)

**Methods**

The choice of tested doses was based on a range-finding maternal toxicity study (Carlson M.B. (2013), CRL study number 20027339) in pregnant CrI:WI(Han) female rats at dose levels of 0 (vehicle control), 100, 300 and 1000 mg/kg bw/day on DGs 6-20. In this range-finding study clinical signs such as urine-stained abdominal fur, slight to moderate excess salivation and ungroomed coat occurred in a generally dose-dependent manner in each of the dose groups. Additionally, dehydration, piloerection, discolored urine, soft or liquid feces, hunched posture, scant feces, decreased motor activity, and discolored fur occurred in the 300 and/or 1000 mg/kg bw/day whereas ptosis, thin body condition, and hyperpnoea occurred in a single rat at 1000 mg/kg bw/day. Maternal body weights/ changes, food consumption, gravid uterine weights and terminal body weights were reduced and absolute and relative liver weights were increased in the 1000 mg/kg bw/day group. On the basis of the observed effects, the dose level of 700 mg/kg bw/day was expected to produce maternal toxicity and the dose levels of 100, 250 and 700 mg/kg bw/day were selected for the main prenatal developmental toxicity study.

All female rats were euthanised on DG 21 and examined for ovarian and uterine contents, and a gross necropsy of the thoracic, abdominal, and pelvic viscera was performed blind to dose group. The following parameters and end points were evaluated: viability, clinical signs, body weights, body weight changes, food consumption, mating performance, gross observations, ovarian and uterine contents, gravid uterine weights, and fetal sex, fetal body weights, and fetal gross external, soft tissue, and skeletal alterations, as well as ossification site averages. Dose formulation samples were collected for concentration and homogeneity analysis by means of a HPLC method.

Stability analyses demonstrated that the test item is stable in the vehicle at room temperature and protected from light for 24 hours and under refrigerated conditions (2-8
Results
Analysis of the dose formulation samples revealed all actual concentrations were within the
acceptance criteria of ± 15% of the respective theoretical concentrations. All dose
formulation samples met acceptance criteria for homogeneity (the relative standard
deviation [RSD] of concentrations was < 5% for each group). Control substance samples
contained no detectable concentrations of the test substance.

Urine-stained abdominal fur, dehydration (based on skin turgor), and red perinasal
substance occurred in the 700 mg/kg bw/day group. These clinical signs were attributed to
administration of the test item. Additional clinical signs included but were not limited to
excess salivation, thin body condition, urine-stained perivaginal area, all of which occurred
in a single animal in the 700 mg/kg bw/day group; these clinical signs were also attributed
to test item administration. Urine-stained abdominal fur also occurred in an increased
number of animals at 250 mg/kg bw/day, and dehydration was noted in a single animal on
a single occasion. No test item-related clinical signs were observed at 100 mg/kg bw/day.

Mean maternal body weights and body weight changes (absolute and corrected for gravid
uterine weights) were reduced at 700 mg/kg bw/day, and mean absolute body weight gain
between DGs 6 and 21 was reduced by 24% when compared to the control group value.
Likewise, mean absolute and relative food consumption values in this dose group were
reduced by 14% and 12%, respectively when compared to the respective control group
values during this same interval. Mean body weight and body weight changes and food
consumption values were not affected by the administration of the test substance in the
other dose groups.

Slight reductions in fetal body weight averages (approximately 7%) were noted at 700
mg/kg bw/day. Fetal morphology examinations revealed reduced numbers of ossified caudal
vertebrae and hind limb tarsals, metatarsals, and phalanges at 700 mg/kg bw/day. No test
item-related effects were observed at 100 and 250 mg/kg bw/day.

Overall, daily test item administration at 700 mg/kg bw/day from DGs 6-20 caused
maternal toxicity, as evidenced by clinical signs, significantly reduced food consumption and
significantly reduced body weight and body weight changes. There were no compound-
related effects regarding pregnancy or Caesarean-sectioning examination parameters. Mean
fetal body weights were slightly reduced at 700 mg/kg bw/day. Fetal examinations revealed
reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs,
but no test item-related effects regarding the incidence of malformations and other
variations. The reductions in the mean number of ossification sites at the caudal vertebrae
and hind limbs were morphological correlates of the reductions in fetal body weight
averages, which occurred at a maternally toxic dose level. It is known from the literature
(Fleeman et al., 2005) that reductions in fetal body weights and delays in ossification
frequently occur concurrent with reduced maternal food consumption and maternal body
weights, as seen in the current study results.

At 250 mg/kg bw/day, a higher incidence of urine-stained abdominal fur was present in the
dams. Mild dehydration (based on skin turgor) occurred in a single rat on a single occasion.
In the absence of any other changes, these findings were not considered as adverse. No
embryo-fetal effects were observed.

Neither maternal nor embryo-fetal effects were observed at 100 mg/kg bw/day.

Conclusion
Under the conditions of this study with the C-1701 B_C_3, the No Observed Adverse Effect Levels (NOAELs) for maternal and embryo-fetal toxicity were established at 250 mg/kg bw/day.

Reductions in fetal body weight averages and reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs occurred at 700 mg/kg bw/day, and were considered related to maternal toxicity, as these effects were concurrent with decreased maternal food consumption and body weights. These reductions in fetal body weights and ossification sites were not observed at lower dose levels, including 250 mg/kg bw/day, where evidence of maternal toxicity was not apparent.

Considering that test item-related slight reduction in fetal body weight and retardation of ossification were seen only in association with maternal toxicity, C-1701 B_C_3 was considered to have no selective embryotoxicity or teratogenicity.

SCCS comment
SCCS agrees with a NOAEL of 250 mg/kg bw/day for maternal toxicity as well as for the embryo-fetal toxicity.

### 3.3.7 Mutagenicity / Genotoxicity

#### 3.3.7.1 Mutagenicity / genotoxicity in vitro

<table>
<thead>
<tr>
<th>Bacterial Reverse Mutation Test (AMES)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Test system:</td>
<td>Salmonella typhimurium strains TA1535, TA100, TA1537, TA98 and E. coli WP2 uvrA</td>
</tr>
<tr>
<td>Replicates:</td>
<td>Triplicate plates</td>
</tr>
<tr>
<td>Test substance:</td>
<td>C-1701 B_C_3</td>
</tr>
<tr>
<td>Batch:</td>
<td>1442/3+4</td>
</tr>
<tr>
<td>Purity:</td>
<td>98.8%</td>
</tr>
<tr>
<td>Solvent:</td>
<td>DMSO</td>
</tr>
<tr>
<td>Concentrations:</td>
<td>0, 33, 100, 333, 1 000, 2 625 and 5 250 μg/plate.</td>
</tr>
<tr>
<td>Treatment:</td>
<td>Exp. 1: Standard plate test (SPT) and Exp. 2: preincubation test (PIT), both with and without a mammalian metabolic activation system, incubation 48-72 h</td>
</tr>
<tr>
<td>Negative control:</td>
<td>DMSO</td>
</tr>
<tr>
<td>Positive control:</td>
<td>with S9-mix: 2 Aminoanthracene (2-AA), without S9-mix: N-methyl-N'-nitro-N-nitrosoguanidine (MNNG), 4-Nitro-o-phenylenediamine (NOPD), 9 Aminoacridine (AAC), 4 Nitroquinoline-N-oxide (4 NQO)</td>
</tr>
<tr>
<td>GLP:</td>
<td>in compliance</td>
</tr>
<tr>
<td>Study period:</td>
<td>10 April 2011 - 31 January 2012</td>
</tr>
</tbody>
</table>

The test substance C-1701 B_C_3 was tested for mutagenicity in the Salmonella typhimurium / Escherichia coli reverse mutation assay both in the standard plate test (SPT) and in the preincubation test (PIT) with and without metabolising system (S9 mix), obtained from phenobarbital/β-napthoflavone-induced rats using the Salmonella strains TA 1535, TA 100, TA 1537, TA 98 and Escherichia coli WP2 uvrA.
The stability of the test item at room temperature in the vehicle DMSO over a period of 4 hours was verified analytically. Bacteriotoxicity was detected by a decrease in the number of revertants, clearing or diminution of the background lawn and/or reduction in the titer. Precipitation of the test item was recorded. Individual plate counts and the mean number of revertant colonies per plate were determined for mutagenicity assessment. The test item was considered positive in this assay if a dose-related and reproducible increase in the number of revertant colonies, i.e. nearly doubling of the spontaneous mutation rate in at least one tester strain either without S9-mix or with S9-mix, was noted. A test substance was considered non-mutagenic if the number of revertant colonies for all tester strains was within the historical NC range under all experimental conditions in two independent experiments. Negative and positive controls were in accordance with the OECD guideline.

Results
Bacteriotoxicity (decrease in the number of his\(^+\) revertants, slight reduction in the titer) was observed in the SPT and PIT depending on the strain and test conditions at or from about 2625 µg/plate onward. No test item precipitation was found with and without S9-mix. C-1701 B_C_3 did not induce a biologically relevant increase in the number of revertant colonies over background, either with S9-mix or without S9-mix in two independent experiments (SPT and PIT). The results of the NC and PC items performed in parallel corroborated the validity of this study, since the values fulfilled the acceptance criteria. The number of revertant colonies in the NC plates was within the range of the historical NC data for each tester strain, with and without S9-mix. In addition, the PC items both with and without S9-mix induced a significant increase in the number of revertant colonies within the range of the historical PC data or above.

Conclusion
C-1701 B_C_3 up to 5250 µg/plate was not mutagenic in the bacterial reverse mutation test (Ames test) neither in the absence nor in the presence of a mammalian metabolic activation system S9-mix under the experimental conditions of the study.

Ref.: Woltkowiak C. (2012)

In vitro Micronucleus Test in human lymphocytes
Species/strain: Cultured human peripheral blood lymphocytes from two female volunteers (pooled blood)
Replicates: Duplicate cultures, two independent experiments
Test substance: C-1701 B_C_3
Batch: 1442/3+4
Purity: 98.8%
Concentrations: Exp1: -S9 mix: 750, 900, 1050 µg/mL (3 h), +S9 mix: 750, 900, 1000 µg/mL (3 h), -S9 mix: 80, 110, 155 µg/mL (24 h) Exp1:-S9 mix: 400, 800, 1000 µg/mL (3 h), +S9 mix: 800, 950, 1000 µg/mL (3 h)
Solvent/negative Control (NC): 0.85% saline
Positive Controls (PC): -S9 mix: Mitomycin C (MMC), Vinblastine (VIN) +S9 mix: Cyclophosphamide (CPA)
Vehicle: DMSO
GLP: In compliance
Study period: 27 October 2011 - September 12, 2012

In an in vitro micronucleus assay, C-1701 B_C_3 (purity/content: 98.8%; batch: 1442/3+4) was tested using duplicate human lymphocyte cultures prepared from the pooled blood of two female donors in two independent experiments for clastogenicity and aneugenicity assessment. The maximum concentrations analysed were determined following a preliminary cytotoxicity experiment. Cytotoxicity was assessed as reduction in the replication index (RI). Suitable maximum concentrations for analysis were selected with special regard to the steep concentration-related toxicity observed.

Treatments were conducted 48 hours following mitogen stimulation with Phytohaemagglutinin (PHA). Cells were exposed to the test item in the vehicle DMSO for 3 hours (followed by 21 hours recovery) in the absence and the presence of a mammalian metabolic activation system (S9-mix from the liver of Aroclor 1254 induced male Sprague Dawley rats). In addition, cells were exposed for 24 hours (equivalent to approximately 1.5 to 2 times the average generation time of cultured lymphocytes from the panel of donors used in this laboratory; no recovery) in the absence of S9-mix.

Negative and positive controls were in accordance with the OECD guideline. All cultures were sampled 24 hours after the beginning of treatment (i.e. 72 hours after culture initiation). A total of 1000 binucleate cells from each culture (2000 cells/concentration) was analysed for micronuclei. The test item was considered to induce clastogenic and/or aneugenic events if a statistically significant increase in the frequency of binucleate cells with micronuclei (MNBN) at one or more concentrations was observed, an incidence of MNBN cells at such a concentration that exceeded the normal range in both replicates was seen and a concentration-related increase in the proportion of MNBN cells was noted.

Results

Experiment 1

Treatment of cells with C-1701 B_C_3 for 3 hours in the absence of S9-mix in Experiment 1 resulted in mean frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest two concentrations analysed (900 and 1050 μg/mL, giving 23% and 69% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95th percentile of the observed historical NC range (0.1-1.0%) in one culture at 900 μg/mL and both cultures at 1050 μg/mL and there was evidence of a concentration-related response. However, the MNBN frequencies in both cultures at 900 μg/mL were below the upper limit of the historical NC range (2.40%) and the only concentration at which the MNBN frequencies exceeded this range (1050 μg/mL) gave 69% reduction in RI (greater than the target RI range of 50-60%). The data therefore showed evidence of micronucleus induction under this treatment condition, but primarily at a cytotoxic concentration at which increased MNBN frequency might be a secondary effect of cytotoxicity.

Treatment of cells for 3 hours in the presence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest concentration analysed (1000 μg/mL, giving 39% reduction in RI). The MNBN cell frequencies exceeded the 95th percentile of the historical NC range (0.1-1.1%) in both cultures at 1000 μg/mL.

Treatment of cells for 24 hours in the absence of S9-mix resulted in frequencies of MNBN cells that were similar to (and not significantly different from) those observed in concurrent NCs at all concentrations analysed. The MNBN cell frequencies in all treated cultures fell within the 95% percentile of the historical NC range (0.1-1.4%).

Experiment 2

Treatment of cells for 3 hours in the absence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at the highest two
concentrations analysed (800 and 1000 μg/mL, giving 31% and 39% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95% percentile of the historical NC range (0.1-1.0%) in both cultures at 800 and 1000 μg/mL and exceeded the upper limit of the historical NC range at 1000 μg/mL with evidence of a concentration-related increase in MNBN cell frequency, thus fulfilling the criteria for a positive response. The data from Experiment 2 in the absence of S9-mix therefore confirmed the evidence of micronucleus induction seen in Experiment 1 at concentrations giving moderate levels of cytotoxicity.

Treatment of cells for 3 hours in the presence of S9-mix resulted in frequencies of MNBN cells that were significantly higher than those observed in concurrent NCs at all three concentrations analysed (800, 950 and 1000 μg/mL, giving 14%, 30% and 46% reductions in RI, respectively). The MNBN cell frequencies exceeded the 95% percentile of the historical NC range (0.1-1.1%) in one culture at 800 μg/mL and in both cultures at 950 and 1000 μg/mL, with evidence of a concentration-related increase in MNBN cell frequency.

Because of the positivity observed after a 3-hour treatment, treatment of cells for 24 hours in the absence of S9-mix was not considered necessary in Experiment 2. The data therefore showed evidence of micronucleus induction in the presence of S9-mix in Experiments 1 and 2.

**Conclusion**

C-1701 B_C_3 induced micronuclei in cultured human peripheral blood lymphocytes when tested for 3 hours in the absence and presence of a mammalian metabolic activation system. In the same test system, the test item did not induce micronuclei when tested up to cytotoxic concentrations for 24 hours in the absence of metabolic activation.

Ref: Lloyd M. (2012)

**SCCS comment**

C-1701 B_C_3 was positive in an in vitro micronucleus assay. After 3h treatment both with and without S9-mix, a statistically significant and concentration-dependent increase in the number of cells with micronuclei was observed in both experiments. The SCCS notes a discrepancy in the highest concentrations used in the MN tests (>750 μg/mL) and in the solubility of the test substance in water (450 μg/mL) as reported in the paragraph 3.1.6 Solubility.

**In Vitro Micronucleus Test using Reconstructed skin Micronucleus (RSMN) assay in EpiDerm™**

<table>
<thead>
<tr>
<th>Guideline:</th>
<th>OECD Guideline not available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species/strain:</td>
<td>EpiDerm™ tissues come from MatTek Corporation (Ashland, MA, USA)</td>
</tr>
<tr>
<td>Replicates:</td>
<td>Two independent experiments, triplicate tissue</td>
</tr>
<tr>
<td>Test substance:</td>
<td>C-1701 B_C_3</td>
</tr>
<tr>
<td>Batch:</td>
<td>0009511412</td>
</tr>
<tr>
<td>Purity:</td>
<td>98.8%</td>
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<tr>
<td>Concentrations:</td>
<td>10, 20, 25, 30, 35, 40, 45, 50, and 60 mg/mL</td>
</tr>
<tr>
<td>Treatment:</td>
<td>First experiment 2-day regime (2x24 h), 2. Experiment 3-day regime (3x 24h)</td>
</tr>
<tr>
<td>Solvent/negative control:</td>
<td>acetone</td>
</tr>
<tr>
<td>Positive Controls:</td>
<td>Mitomycin C (MMC),</td>
</tr>
<tr>
<td>Vehicle:</td>
<td>acetone</td>
</tr>
<tr>
<td>GLP:</td>
<td>In compliance</td>
</tr>
<tr>
<td>Study period:</td>
<td>November 2, 2015 – March 16, 2016</td>
</tr>
</tbody>
</table>

The genotoxic potential of C-1701 B_C_3 (purity/content: 98/73% by HPLC, batch
0009511412) was assessed for induction of micronuclei in the reconstructed skin micronucleus assay (RSMN) in EpiDerm™ on the basis on an expert recommended protocol (Dahl et al., 2011) derived from the general in vitro micronucleus OECD Guideline 487. Tissues were treated by application of 10 µL of the test article/vehicle mixture at the appropriate concentration on the top surface of the tissue. EpiDerm™ tissues come from MatTek Corporation (Ashland, MA, USA) and are multi-layered, differentiated tissues consisting of basal, spinous, granular and cornified layers resembling the normal human epidermis (MatTek Corporation, 2010). Cytotoxicity was assessed by calculating the cytokinesis-block proliferation index (CBPI) and determining the relative viable cell count (RVCC), whichever parameter came first. In the preliminary cytotoxicity and the 1st definitive micronucleus assay, EpiDerm™ tissues were treated twice, 24 hours apart, and tissues were processed at 48 hours (2-day dosing regimen). In the confirmatory micronucleus assay, the tissues were treated three times, 24 hours apart, and tissues were processed at 72 hours (3-day dosing regimen). The preliminary cytotoxicity test was conducted by exposing a single tissue per concentration to vehicle alone and 15 concentrations of the test article ranging from 0.006 to 100 mg/mL (corresponding to the maximum recommended concentration). Both Micronucleus assays were conducted with 9 concentrations using triplicate tissues. The highest dose level evaluated for micronuclei was selected to give 50 to 60% cytotoxicity (CBPI relative to the vehicle control or reduction in RVCC, whichever comes first) and at least two additional dose levels, demonstrating moderate to minimal toxicity, were also evaluated.

**Results**

In the preliminary assay, ≥ 50% cytotoxicity by calculating CBPI relative to vehicle control was observed at concentrations ≥ 50 mg/mL, while cytotoxicity RVCC determination was not observed at any concentrations. Precipitate was observed on the tissue at concentrations ≥ 50 mg/mL at the end of treatment. Based on these results, the definitive micronucleus assay was conducted at concentrations ranging from 10 to 60 mg/mL. A 50 to 60% cytotoxicity by calculating CBPI relative to vehicle control was observed in the 3 replicates at the concentrations of 25 and 30 mg/mL, while cytotoxicity by RVCC determination was not observed at any concentration. The concentrations selected for scoring micronuclei were 10, 20, 25, and 30 mg/mL. One thousand binucleated cells per tissue were scored for the presence of micronuclei. The percentage of micronucleated binucleated cells in the test article-treated tissues was not significantly increased relative to the vehicle control at any concentration tested. Since the result of the micronucleus assay using a 2-day dosing regimen was negative, a confirmatory assay was conducted with a 3-day dosing regimen at concentrations ranging from 8 to 35 mg/mL.

In the confirmatory micronucleus assay, cytotoxicity of 50 to 60% (determined by calculating CBPI relative to vehicle control) was observed at the concentrations of 24 and 26 mg/mL, while cytotoxicity (RVCC) was not observed at any other concentrations. The concentrations selected for scoring micronuclei were 8, 20, and 26 mg/mL. The percentage of micronucleated binucleated cells in the test article-treated tissues was not significantly increased relative to the vehicle control at any concentration tested. In addition, in the definitive and confirmatory micronucleus assays, the percentage of micronucleated binucleated cells in the vehicle control was within the acceptable historical control range and the percentage of micronucleated binucleated cells in the positive control was statistically increased and also within the historical positive range.

**Conclusion**

Based on the findings of this study, it was concluded that C-1701 B_C_3 was negative for the induction of micronuclei in the reconstructed skin micronucleus assay (RSMN) in EpiDerm™. Ref.: Shambhu R. (2016)
Conclusion on genotoxicity

The genotoxic potential of C 1701 B_C_3 was evaluated in an extensive battery of in vitro studies including the bacterial reverse mutation test, a micronucleus test in cultured human lymphocytes and also in a reconstructed skin micronucleus assay (RSMN assay) in EpiDerm™ model. When tested for gene mutation in a bacterial system (in independent experiments) with and without addition of a mammalian metabolic activation system, the UV filter C 1701 B_C_3 was shown to be non-mutagenic in vitro. The potential of C-1701 B_C_3 to induce clastogenicity and/or aneugenicity was assessed in two separate in vitro micronucleus tests. In the in vitro micronucleus test in cultured human peripheral blood lymphocytes, C-1701 B_C_3 induced micronuclei when tested for 3 hours in the absence and presence of a mammalian metabolic activation system. A reconstructed skin micronucleus assay (RSMN assay) in EpiDerm™ model was done as an alternative to an in vivo test. In this test, C-1701 B_C_3 did not induce any increase in the frequency of micronuclei at any tested concentrations showing a sufficient cytotoxicity (50-60% of cytotoxicity). This model currently under validation has already been demonstrated to be sensitive to the clastogenic and aneugenic activity of variety of chemicals and is considered as especially relevant for chemicals for which human exposure is expected to be dermal. In addition, the Epiderm™ model has been shown to be more permeable than human skin and the applied dose is higher in this test than expected in human. Thus, the exposure conditions in this model are assumed to be maximal.

Taken together, the results obtained in the available in vitro test battery, addressing all relevant endpoints of genotoxicity, indicate that the UV filter C-1701 B_C_3 is non-mutagenic and non-genotoxic.

SCCS comment

The SCCS considers RSMN assay a promising new in vitro approach designed to assess genotoxicity of dermally-applied compounds. However, in the RSMN assay on S87 (GLP study) submitted by the applicant, only Mitomycin C was used (a direct-acting clastogen) as a positive control substance. Additional genotoxins with a different mode of action should be applied as a positive control (e.g. cyclophosphamide, indirectly acting clastogen and vinblastine, direct aneugen).

SCCS is of the opinion that the reconstructed skin micronucleus EpiDerm assay alone cannot be used to overrule the positive result in the in vitro micronucleus test.

3.3.7.2 Mutagenicity / genotoxicity in vivo

In vivo Mammalian Erythrocytes Micronucleus Test

| Guideline: | OECD 474 (1997) |
| Species/strain: | Sprague-Dawley (Hsd:SD) male and female Sprague-Dawley rats |
| Group size: | 5 rats/sex/group |
| Test substance: | C-1701 B_C_3, the code number AD48SR |
| Batch: | C-1701/8 |
| Purity: | 98.4 – 98.7 99.2% |
| Vehicle: | Polyethylene glycol PEG 300 (CAS no 25322-68-3; lot no S5473984) |
| Positive control: | Cyclophosphamide monohydrate (CP; CAS no 6055-19-2; lot no 120M1253V) |
| Dose level: | 500, 1000 and 2000 mg/kg bw |
| Route: | oral |
| Treatment: | twice in 24h interval |
C-1701 B has been investigated for the induction of micronucleated polychromatolytic erythrocytes (mnPCEs) in the bone marrow of male and female Sprague-Dawley rats after repeated administration. Groups of 5 Sprague-Dawley rats/sex/dose level received a first (first dose given on day 0) and, 24 hours later, a second oral gavage treatment with the test item suspended in Polyethylene glycol 300 (PEG 300) at dose levels of 500, 1000 or 2000 mg/kg/d (dose volume: 10 mL/kg). A concurrent control group of 5 rats/sex was dosed similarly with the vehicle only. A positive control group of 5 rats/sex received a single oral gavage administration of Cyclophosphamide (CPA) in water at 40 mg/kg. During the in-life period mortality, clinical signs and body weights were repeatedly assessed. Following necropsy (conducted 24 hours after last administration) and preparation of bone marrow smears, the number of mnPCE was counted in 2000 PCEs for each animal using a fluorescent microscope. The number of normochromatolytic erythrocytes (NCEs) and micronucleated NCEs (mnNCEs) in the field of 1000 total erythrocytes (PCEs + NCEs) was determined for each animal. The proportion of PCEs to total erythrocytes was determined per total of 1000 erythrocytes (PCEs + NCEs) for each animal as an indication of bone marrow cytotoxicity. A test substance is considered positive in this assay if it induces a significant increase in mnPCE frequency at any dose level or sampling time (p ≤ 0.05, one-way ANOVA or T-test or Kastenbaum and Bowman table). During the study, dose formulation samples were collected for homogeneity and concentration control analysis.

**Results**

No mortality was observed in any of the treatment groups. Diarrhea was noted in two male rats in the vehicle control group on day 2 (first dose given on day 0). In all high dose group animals piloerection was noted after the second administration of 2000 mg/kg (day 1) which persisted in the males until euthanasia (day 2). All other animals appeared normal during the study period. No appreciable changes in group mean body weights were observed in most groups, although a slight body weight loss was observed in high dose males between days 1 and 2. These adverse effects were considered to represent evidence of systemic exposure of treated animals to the test substance.

Based on the analytical results, all test item formulations used in this study were within the adequate range and the test item was homogeneously distributed in the vehicle. There were no statistically significant decreases in the proportion of PCEs to total erythrocytes at any dose level (p > 0.05), indicating that the test item did not inhibit erythropoiesis. However, individual high dose males (2000 mg/kg/d) exhibited decreased PCE proportions as compared to the concurrent control males. Collectively, the clinical observations, the loss in body weight between days 1 and 2 in males, and individually low PCE proportions in males were considered to be indicative of systemic exposure to the test substance in animals given the highest dose level.

No statistically significant increases in mnPCE frequencies were observed at any dose level of the test item as compared to the concurrent vehicle control (p > 0.05). In contrast, the positive control item induced a statistically significant increase in mnPCE frequencies (p ≤ 0.05). All positive and vehicle control values were within acceptable ranges, and all criteria for a valid assay were met.

**Conclusion**

Under the conditions of this _in vivo_ study, C-1701 B_C_3 was negative in the bone marrow micronucleus test in male and female rats after repeated administration. The adverse effects seen at the high dose were considered to be indicative of systemic exposure to the test substance.
SCCS comment
The SCCS agrees that, from the clinical symptoms observed (also considering other toxicity studies) there is a sufficient proof of systemic exposure. Analysis of plasma to measure whether S87 reached systemic circulation could provide further evidence of bone marrow exposure. It is not clear how many experiments represent historical controls, i.e. how many studies were conducted between 2009-2011.

3.3.8 Carcinogenicity
/

3.3.9 Photo-induced toxicity

3.3.9.1 Phototoxicity / photo-irritation and photosensitisation

In vitro 3T3 NRU phototoxicity test

Species: Balb/c 3T3 cells
Test substance: C-1701 B_C_3
Batch: C-1701/8
Purity: 96.3%
Vehicle: aqueous Dimethyl sulfoxide (DMSO, 1.0% v/v)
Exposure duration: 24 h
Concentrations: UVA: 0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 μg/mL; +UVA: 0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 μg/mL
GLP: In compliance
Study period: July – September 2012

Photo-cytotoxicity was estimated using the neutral red uptake (NRU) method. Two independent experiments (Experiment 1 and 2) were carried out, both with and without irradiation by means of an ultraviolet A (UVA) source. According to an initial range-finding phototoxicity test conducted for the determination of experimental concentrations, the following concentrations were tested in aqueous Dimethyl sulfoxide (DMSO, 1.0% v/v) in both main experiments:

- without UVA irradiation (-UVA)
  0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 μg/mL
- with UVA irradiation (+UVA)
  0, 4.6, 10.0, 21.5, 46.4, 100.0, 215.4, 464.2, 1000.0 μg/mL

After an attachment period of about 24 hours, the cells were pre-incubated with the test item or the positive control (PC) item Chlorpromazine (CPZ) for 1 hour in the dark. Then one microtiter plate per substance (test item or PC item) was irradiated for 50 minutes with the UVA irradiation source (approximately 5 J/cm²). The respective reference plates treated in parallel were kept in the dark for the same period. About 24 hours after end of treatment, the cytotoxicity was determined by measuring the NRU using a microplate reader. In
addition, the pH value, osmolarity, test item solubility (precipitation) and cell morphology in
the cultures were assessed.

The prediction model is based on the comparison of two equi-effective cytotoxic
concentrations (EC50 values) obtained in concurrently performed experiments in the
absence (-UVA) and presence (+UVA) of UVA irradiation, which are used to calculate a
photo-irritancy factor (PIF): PIF = EC50(-UVA) / EC50(+UVA)
If a test substance is only cytotoxic after irradiation (+UVA), a C PIF has to be calculated
using the highest test concentration (Cmax) applied in the experimental part in the absence
of UV light (-UVA): C PIF = Cmax(-UVA) / EC50(+UVA)

Results
After treatment with the test item, cytotoxic effects indicated by neutral red absorbance
values of below 50% of control were observed in Experiments 1 and 2 in the presence of
UVA irradiation and only in Experiment 2 in the absence of UVA irradiation at the highest
concentration. Without UVA irradiation, in Experiment 2 there was a decrease in the cell
number at 1000 μg/mL (EC50: 958.1 μg/mL). The cell densities were not distinctly reduced.
In addition, with UVA irradiation, there was a decrease in the cell number at 1000 μg/mL
(Experiment 1: EC50 of 998.7 μg/mL; Experiment 2: EC50 of 758.4 μg/mL). The cell
densities were not distinctly reduced. Based on the EC50 values a C PIF of 1.0 (no
phototoxic potential) was obtained in Experiment 1 and a PIF of 1.3 (no phototoxic
potential) was obtained in Experiment 2.
The vehicle controls (DMSO) clearly fulfilled the acceptance criteria. The PC item led to the
expected cytotoxicity both with and without UVA irradiation (PIF: 28.7 and 44.2 in each
experiment, respectively). Osmolarity and pH values were not influenced by the test item
treatment. No precipitation was noted in Experiments 1 and 2 at the end of the exposure
period.

Conclusion
Under the experimental conditions of this study, C-1701 B_C_3 was not a phototoxic
substance in the in vitro 3T3 NRU phototoxicity test using Balb/c 3T3 cells.

Ref.: Cetto V. (2012)

Skin photosensitisation study in guinea pigs

Guideline/method: No guideline available
Species/strain: Guinea pig / Hartley Crl:HA
Group size: Main study: 10 animals/group (with UV irradiation) and 5
animals/group (without UV irradiation), Positive control: 2 groups
with 5 animals/group
Test substances: C-1701 B_C_3 (solution 50% (w/v) in N,N-Dimethylformamide)
Batch: C-1701/8
Purity: 96.3% (1H-NMR)
Concentration: 10, 25 or 50 w/v% (preliminary study) and 50% (w/v) (main study)
Volume: Duplicate 0.5 mL samples
Route:
Negative control: 3,3′,4′,5 Tetrachlorosalicylanilide (TCSA) in acetone.
Positive control: Dermaray®-200 type UV irradiator
Irradiation: In the main study the actual values of irradiance, intensity and
duration of irradiation were 8.10-8.85 J/cm², 5.4-5.9 mW/cm² and
1500 s for UVA light and 0.093-0.098 J/cm², 0.93-0.98 mW/cm² and
100 s for UVB light, respectively
Observations: 1, 4, 24 and 48 hrs after application
GLP: In compliance
Study period: 28 August 2012- 9 January 2013
The concentrations of dose formulations used in this study were verified by means of a HPLC method. The stability of another batch of C-1701 B_C_3 (batch: 1442/3+4) at 1 and 50% (w/v) was confirmed for a storage duration of 4 hours in tight containers at room temperature. Dose formulations in this study were used within 2 hours after preparation. In the main assay, a test item concentration of 50% (w/v) was used for induction and challenge.

Results
No clinical signs were observed in any animal in the test item or vehicle control group. The animals gained weight in a normal range during the course of the study. During the induction period, slight erythema (score = 0.5) was observed in 2 animals each at the induction sites with DMF in the vehicle control and UV irradiated test item groups starting prior to the fourth induction until prior to the last (sixth) induction. No erythema was observed at any induction site with the test item in the UV-irradiated or UV non-irradiated test item group. No erythema was observed at any challenge site with the test item in the vehicle control group, the test item groups (with or without UV irradiation) or at any challenge site with DMF in the UV-irradiated test item group. In the PC groups, slight erythema (score = 0.5) was observed prior to the fourth induction at the induction sites with TCSA in the UV-irradiated and UV non-irradiated groups. The degree of erythema increased thereafter and erythema was still observed at 24 hours after the last induction. At the challenge sites with TCSA, slight erythema was observed in the UV non-irradiated group and mild or marked erythema was observed in the UV irradiated group. Therefore, the skin photosensitising potential of TCSA was confirmed and it was demonstrated that this study was conducted under the appropriate conditions. Analysis of dose formulations revealed appropriate dosing with the test item. The mean measured concentrations at the first and second preparations were 113.5% and 98.9% of the nominal concentration, respectively and were considered acceptable.

Conclusion
Based on the results obtained, under the conditions of this study, C-1701 B_C_3 displayed no skin photoirritating or photosensitising potential when tested up to 50% (w/v) in DMF.

Ref: Matsuda A. (2013) Ina Research Inc. study number ZB12180
BASF project number 47H0473/11X539

3.3.9.2 Phototoxicity / photomutagenicity / photoclastogenicity

Photomutagenicity in a Salmonella typhimurium and Escherichia coli reverse mutation assay

Guideline: Based on OECD 471; EC 440/2008, B.13/14, SCCNFP/0690/03
Species/strain: Salmonella typhimurium strains TA1537, TA98, TA100, TA102 and Escherichia coli strain WP2
Replicates: Triplicates in 3 individual experiments
Test substance: C-1701 B_C_3
Solvent: DMSO
Batch: C-1701/8
Purity: 96.8%
UV source: Dr. Hönle Sol 500 solar simulator
UVA doses: TA 1537, TA 98, T100 and WP2: 486 mJ/cm², TA102 324 mJ/cm²
UVB doses: The filter H1 was used to keep the UVB irradiation as low as possible.
Concentrations: Pre- Experiment: 3, 10, 33, 100, 333, 1000, 2500, 5000 μg/plate
Experiment I and II: 33, 100, 333, 1000, 2500, 5000 μg/plate
Positive controls: -UVA: Sodium azide (TA100, 10 μg/plate), 4-Nitro-o-phenylene-diamine
(TA1537, 50 μg/plate; TA98, 10 μg/plate), methyl methane sulfonate (WP2 and TA102, 3.0 μL/plate). +UVA: 8-methoxypsoralen (WP2, TA102; 125 μg/plate).
Treatment: In compliance
Date: 24 October 2012 – 13 May 2013

Methods
This study was performed to investigate the potential of C-1701 B_C_3 to induce gene
mutations under irradiation with artificial sunlight according to the plate-incorporation test
(Experiment I) and the pre-incubation test (Experiment II) using the Salmonella
typhimurium strains TA1537, TA98, TA100, TA102 and Escherichia coli strain WP2. These
strains were chosen since they tolerate relatively high doses of ultraviolet (UV) irradiation
used to assess the possible photomutagenic potential of sunblockers.
The assay was performed in three independent experiments including a pre-experiment for
dose selection for the main experiments. Each concentration, including the controls, was
tested in triplicate.

Results
Precipitation of the test item was observed in the overlay agar in the test tubes at 5000
μg/plate in all experiments. No precipitation of the test item was observed on the incubated
agar plates.
The plates incubated with the test item showed normal background growth up to 5000
μg/plate without metabolic activation with irradiation in both independent experiments. No
toxic effects, evident as a reduction in the number of revertants, occurred in the test groups
with irradiation and without metabolic activation. No substantial increase in revertant colony
numbers of any of the 5 tester strains was observed following test item treatment under
irradiation with artificial sunlight at any concentration tested.
The appropriate reference mutagens used as PCs showed a distinct increase of induced
revertant colonies over background, thus confirming sensitivity of the test system.

Conclusion
Under the experimental conditions reported, C-1701 B_C_3 did not induce gene mutations
by base pair changes or frameshifts in the genome of the bacterial strains used. Therefore,
C 1701 B_C_3 was non-mutagenic in this Salmonella typhimurium and Escherichia coli
photomutagenicity assay.

Ref.: Sokolowski A. (2013)
CALCULATION OF THE MARGIN OF SAFETY

Margin of safety calculation based on dermal absorption of test substance reported in \( \mu g/cm^2 \).

The estimated systemic exposure dose (SED), that results from exposure to C 1701 B_C_3 in cosmetic products (3% w/w), when applied to the human skin, is calculated to amount to 1.02 mg/kg bw/day under consideration of the test item fraction absorbed in the key in vitro dermal absorption study conducted with split-thickness human skin according to the following formula:

\[
\text{Absorption through the skin} \quad DA_a = 1.75 \mu g/cm^2
\]

\[
\text{Skin Area surface} \quad SSA = 17500 \text{ cm}^2
\]

\[
\text{Dermal absorption per treatment} \quad SSA \times DA_a \times 0.001 = 30.6 \text{ mg}
\]

\[
\text{Typical body weight of human} \quad = 60 \text{ kg}
\]

\[
\text{Systemic exposure dose (SED)} \quad SAS \times A \times 0.001 \times F*/... = 1.02 \text{ mg/kg bw}
\]

\[
\text{No observed adverse effect level (90-day, oral, rat)} \quad \text{NOAEL} = 250 \text{ mg/kg bw/d}
\]

\[
\text{Bioavailability 50%*} \quad = 125 \text{ mg/kg bw/d}
\]

| Margin of Safety | adjusted NOAEL/SED = 122 |

*F = frequency of product application (= 2 as recommended for suncare products in NoG, worst case scenario)

The estimated systemic exposure dose (SED), that results from exposure to C 1701 B_C_3 in cosmetic products (3% w/w), when applied to the human skin, is calculated to amount to 1.02 mg/kg bw/day under consideration of the test item fraction absorbed in the key in vitro dermal absorption study conducted with split-thickness human skin according to the following formula:

The margin of safety (MoS) is determined as the ratio of 50% of the lowest NOAEL (NOAELsys) and the estimated SED in humans. An acceptable MoS of 122 is derived for the use of C-1701 B_C_3 at 3% in a cosmetic product.

3.6 Discussion

**Physicochemical properties**

The SCCS has noted that the quantification for the impurities was based on HPLC-DAD data of the concentrated and the diluted solution of the test substance. Therefore, the Applicant should explain the dilution factor used for the calculation and the linearity range (concentrations) of the test substance.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

**Function and uses**

S87 is proposed to be used as a UV filter in personal care products, including suncare cosmetic formulations at a maximum concentration of 3% w/w.
Toxicological Evaluation

Acute toxicity
On the basis of data provided, C-1701 B_C_3 is not considered to be acutely toxic.

Irritation and corrosivity
The skin irritation potential of neat substance C 1701 B_C_3 has been tested in vitro according to OECD TG 439 (2010) using the Epiderm™ model. The amount of test item brought onto the tissues was too low. On the basis of this in vitro study, a skin irritation potential of C 1701 B_C_3 cannot be excluded.

On the basis of the results obtained for C 1701 B_C_3 in the BCOP assay (OECD 437, 2009), it can be concluded that C 1701 B_C_3 does not cause serious eye damage. The eye irritation potential of C 1701 B_C_3 has been tested in vitro using the EpiOcular™ test system. The study was performed prior to the acceptance of the official guideline of this test. The amount of test item brought onto the tissues was too low. On the basis of these results, an eye irritation potential of C 1701 B_C_3 cannot be excluded.

Skin sensitisation
The skin sensitising potential of C 1701 B_C_3 was assessed in the LLNA:BrdU-ELISA assay. Based on the results of this study, C 1701 B_C_3 is regarded to be a non-skin sensitiser.

Dermal absorption
The dermal absorption study was performed adequately. The SCCS has therefore decided to use the mean +1SD (1.63%+1.02=2.65% or 1.08+0.67 µg/cm²=1.75 µg/cm²) for MoS calculations.

Repeated dose toxicity
Administration of C-1701 B_C_3 by oral gavage to rats once a day for 90 days at a dose of 1000 mg/kg/day resulted in no test article-related gross findings, although liver weight changes with associated microscopic liver findings (centrilobular hypertrophy) were noted. There were statistically significant changes in other organ weights, but there were no patterns, trends or associated microscopic findings to identify them as being toxicologically relevant. Administration of C-1701 B_C_3 by oral gavage to rats once a day for 90 days at a dose of 100 or 300 mg/kg/day resulted in no test article-related gross findings, organ weight changes in liver (increased) only in females at the 300 mg/kg/day dose level and no microscopic findings in the liver. Therefore, based on these results, a NOAEL of 300 mg/kg/day may be derived.

Inhalation toxicity
No data have been provided on inhalation toxicity of S87.

Reproductive toxicity
Based on the results of a reproduction/developmental screening study in rats, the NOAEL for parental toxicity of C 1701 B_C_3 was considered to be 250 mg/kg bw/day given the signs observed at the highest tested dose (urine-stained abdominal fur, mean body weight gains and slightly decreased mean food consumption values). The NOAEL for reproductive toxicity was considered to be 250 mg/kg bw/day, based on the reductions in mean pup weights per litter at 700 mg/kg bw/day, which were probably related to maternal toxicity.
Based on the results of a developmental toxicity study in rats, a NOAEL for maternal and for embryo-fetal toxicity was established at 250 mg/kg bw/day. Indeed, reductions in fetal body weight averages and reductions in the mean number of ossification sites in the caudal vertebrae and hind limbs occurred at 700 mg/kg bw/day, and were considered related to maternal toxicity, as these effects were concurrent with decreased maternal food consumption and body weights. These reductions in fetal body weights and ossification sites were not observed at lower dose levels, including 250 mg/kg bw/day, where evidence of maternal toxicity was not apparent.

C-1701 B_C_3 was considered to be of no concern regarding embryotoxicity or teratogenicity.

**Mutagenicity / genotoxicity**

The genotoxicity of C-1701 B_C_3 was investigated in the three endpoints of genotoxicity: gene mutations, structural chromosome aberrations and aneuploidy. C-1701 B_C_3 did not induce gene mutations in 4 strains of Salmonella typhimurium (TA98, TA100, TA1535, TA1537) nor in the E. coli WP2 uvrA strain up to the concentration of 5250 μg/plate in the absence and in the presence of a rat liver metabolic activation system (S-9 MIX). However, C-1701 B_C_3 clearly induced micronuclei in cultured human peripheral blood lymphocytes in the absence and presence of S-9 mix. Results from subsequent 3D human reconstructed skin micronucleus test did not indicate any mutagenic effect of C-1701 B_C_3. C-1701 B_C_3 has been also investigated for the induction of micronucleated polychromatic erythrocytes (mnPCEs) in the bone marrow of male and female Sprague-Dawley rats after repeated administration. Under the conditions of this *in vivo* study, C-1701 B_C_3 was negative in the bone marrow micronucleus test in male and female rats. Considering the data obtained in the *in vitro* and *in vivo* test battery, C-1701 B_C_3 was considered to have no genotoxic potential *in vivo*. No further testing is necessary.

**Carcinogenicity**

**Photo-induced toxicity**

The data provided did not show any evidence for phototoxicity.

**Human data**

**Special investigation**
4. CONCLUSION

(1) In light of the data provided, does the SCCS consider Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), safe when used as UV-filter in cosmetic products up to a maximum concentration of 3%?

Based on the data submitted, the SCCS concluded that the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87), as a UV-filter in cosmetic products up to a maximum concentration of 3%, can be considered safe.

Inhalation toxicity was not assessed in this Opinion because no data were provided. Hence, this Opinion is not applicable to any sprayable products that could lead to exposure of the consumer’s lung by inhalation.

(2) If not, what is according to the SCCS, the maximum concentration considered safe for Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) when used as UV-filter in cosmetic products?

(3) Does the SCCS have any further scientific concerns with regard to the use of Methoxypropylamino Cyclohexenylidene Ethoxyethylcyanoacetate (S87) in cosmetic products?

As in the previous Submission, adequate studies on skin and eye irritation have not been provided in this Submission. Hence, skin and eye irritation potential of S87 cannot be excluded.

S87 is a secondary amine, and thus is prone to nitrosation and formation of nitrosamines. It should not be used in combination with nitrosating substances. The nitrosamine content should be < 50 ppb.

5. MINORITY OPINION

/
6. REFERENCES

References included in the Submission I:


Carlson M.B. (2013). Oral 14-day dose range-finding toxicity study of C-1701 B_C_3 in rats. Charles River Laboratories study number 20018415. BASF Project Number 99C0284/11X221

Carlson M.B. (2013). C-1701 B_C_3. Repeat dose 90-day toxicity study in Wistar Han rats by oral administration (gage). Charles River Laboratories study number 20027338 (BASF project number 50C0473/11X497).


Matsuda A. (2013). Skin photosensitization study with C-1701 B_C_3 in guinea pigs. Ina Research Inc. study number ZB12180 (BASF project number 47H0473/11X539).

Matsuda A. (2012). Non-radioactive murine local lymph node assay (LLNA) with C-1701 B_C_3 according to OECD 429, OECD 442B, EC B.42 and OPPTS 870.2600. Ina Research Inc. study number ZB11327 (BASF project number 58V0473/11X188).


Sokolowski A. (2013). Photomutagenicity in a *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay with C-1701 B_C_3. Harlan CCR study number 1510400 (BASF project number 41M0473/11X581).


References cited but not submitted


Fux P. (2013). Determination of the melting point and melting heat of C-1701 B_C_3 by DSC. BASF Schweiz AG study number 12B020282b.


SCCS (2015). The SCCS’s notes of guidance for the testing of cosmetic ingredients and their safety evaluation. 9th revision, SCCS/1564/15.


Winkler S. (2013). Water solubility. Siemens AG study number 20120207.06 draft.

References included in the Submission II:


Cannamela N. (2013). Test Item 758558. Ocular primary irritation, BCOP. Study performed on isolated bovine corneal, measurement of the bovine corneal opacity and permeability. IEC France, Study Number 130420RD1.

Carlson M.B. (2013). Oral 14-day dose range-finding toxicity study of C-1701 B_C_3 in rats. Charles River Laboratories study number 20018415. BASF Project Number 99C0284/11X221

Carlson M.B. (2013). C-1701 B_C_3. Repeat dose 90-day toxicity study in Wistar Han rats by oral administration (gavage). Charles River Laboratories study number 20027338 (BASF project number 50C0473/11X497).


Matsuda A. (2012). Non-radioactive murine local lymph node assay (LLNA) with C-1701 B_C_3 according to OECD 429, OECD 442B, EC B.42 and OPPTS 870.2600. Ina Research Inc. study number ZB11327 (BASF project number 58V0473/11X188).

Matsuda A. (2013). Skin photosensitization study with C-1701 B_C_3 in guinea pigs. Ina Research Inc. study number ZB12180 (BASF project number 47H0473/11X539).


Specker W (2017). Analytical Report - Impurity Profile of C-1701 B_C_3 samples by LC/MS and HPLC-DAD. (BASF, Order No. 17502624; v3)


References cited but not submitted


Fux P. (2013). Determination of the melting point and melting heat of C-1701 B_C_3 by DSC. BASF Schweiz AG study number 12B020282b.


SCCS (2015). The SCCS’s notes of guidance for the testing of cosmetic ingredients and their safety evaluation. 9th revision, SCCS/1564/15.


Winkler S. (2013). Water solubility. Siemens AG study number 20120207.06 draft.

Data base search for references
No data base search was performed for the present Submission.

7. GLOSSARY OF TERMS

See SCCS/1602/18, 10th Revision of the SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and their Safety Evaluation – from page 141

Glossary from the Applicant

A Absorbance
AAC 9-Aminoacridine
ANOVA Analysis of variance
2-AA 2-Aminoanthracene
BCOP Bovine corneal opacity and permeability
BrdU Bromodeoxyuridine
BSA Bovine serum albumin
bw Body weight
CAS Chemical Abstracts Service
CHO Chinese hamster ovary
CPA Cyclophosphamide
CPZ Chlorpromazine
C$_{\text{max}}$ Maximum concentration
DG Day of gestation
DL Day of lactation
DMF N,N-Dimethylformamide
DMSO Dimethyl sulfoxide
DPP Day post partum
DSC Differential scanning calorimetry
$\epsilon$ Specific absorptivity
EC$_{50}$ Effective concentration 50
EMS Ethyl methanesulfonate
EPA Environmental Protection Agency
F Filial generation
FID Flame ionisation detector
FOB Functional observation battery
FTIR Fourier transform infrared
GC Gas chromatography
GI Gastrointestinal
GLP Good laboratory practice
HCA $\alpha$-Hexyl cinnamic aldehyde
his Histidine
HPLC High-performance liquid chromatography
HPRT Hypoxanthine-guanine phosphoribosyl transferase
HS Headspace
INCI International Nomenclature of Cosmetic Ingredients
i.p. Intraperitoneal (administration)
IR Infrared
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Definition</th>
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<tbody>
<tr>
<td>IVIS</td>
<td><em>In vitro</em> irritancy score</td>
</tr>
<tr>
<td>Koc</td>
<td>Adsorption coefficient</td>
</tr>
<tr>
<td>LC</td>
<td>Liquid chromatography</td>
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<tr>
<td>LD</td>
<td>Lethal dose</td>
</tr>
<tr>
<td>LLNA</td>
<td>Local lymph node assay</td>
</tr>
<tr>
<td>LLOQ</td>
<td>Lower limit of quantification</td>
</tr>
<tr>
<td>MCA</td>
<td>Methylcholanthrene</td>
</tr>
<tr>
<td>MCH</td>
<td>Mean corpuscular hemoglobin</td>
</tr>
<tr>
<td>MCHC</td>
<td>Mean corpuscular hemoglobin concentration</td>
</tr>
<tr>
<td>MCV</td>
<td>Mean corpuscular volume</td>
</tr>
<tr>
<td>MMC</td>
<td>Mitomycin C</td>
</tr>
<tr>
<td>mn</td>
<td>Micronucleated</td>
</tr>
<tr>
<td>MNBN</td>
<td>Micronucleated binucleate cells</td>
</tr>
<tr>
<td>MNNG</td>
<td>N-methyl-N’-nitro-N-nitrosoguanidine</td>
</tr>
<tr>
<td>MoS</td>
<td>Margin of safety</td>
</tr>
<tr>
<td>MS</td>
<td>Mass spectrometry</td>
</tr>
<tr>
<td>MTT</td>
<td>Tetrazolium salt</td>
</tr>
<tr>
<td>MW</td>
<td>Molecular weight</td>
</tr>
<tr>
<td>n</td>
<td>Number of samples</td>
</tr>
<tr>
<td>NC</td>
<td>Negative control</td>
</tr>
<tr>
<td>NCE</td>
<td>Normochromatic erythrocytes</td>
</tr>
<tr>
<td>ND</td>
<td>No data</td>
</tr>
<tr>
<td>n.d.</td>
<td>Not determined</td>
</tr>
<tr>
<td>NMR</td>
<td>Nuclear magnetic resonance</td>
</tr>
<tr>
<td>no.</td>
<td>Number</td>
</tr>
<tr>
<td>NOAEL</td>
<td>No Observed Adverse Effect Level</td>
</tr>
<tr>
<td>NOPD</td>
<td>4-Nitro-o-phenylenediamine</td>
</tr>
<tr>
<td>NRU</td>
<td>Neutral red uptake</td>
</tr>
<tr>
<td>n.s.</td>
<td>Not significant</td>
</tr>
<tr>
<td>4-NQO</td>
<td>4-Nitroquinoline-N-oxide</td>
</tr>
<tr>
<td>OCSPP</td>
<td>Office of Chemical Safety and Pollution Prevention</td>
</tr>
<tr>
<td>OD</td>
<td>Optical density</td>
</tr>
<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
</tr>
<tr>
<td>OPPTS</td>
<td>Office of Prevention, Pesticides and Toxic Substances</td>
</tr>
<tr>
<td>P</td>
<td>Parental generation</td>
</tr>
<tr>
<td>PBS</td>
<td>Phosphate buffered saline</td>
</tr>
<tr>
<td>PC</td>
<td>Positive control</td>
</tr>
<tr>
<td>PCE</td>
<td>Polychromatic erythrocytes</td>
</tr>
<tr>
<td>PEG</td>
<td>Polyethylene glycol</td>
</tr>
<tr>
<td>PHA</td>
<td>Phytohaemagglutinin</td>
</tr>
<tr>
<td>PIF</td>
<td>Photo-irritancy factor</td>
</tr>
<tr>
<td>PIT</td>
<td>Preincubation test</td>
</tr>
<tr>
<td>pKa</td>
<td>Dissociation constant</td>
</tr>
<tr>
<td>PND</td>
<td>Postnatal day</td>
</tr>
<tr>
<td>RI</td>
<td>Replication index</td>
</tr>
<tr>
<td>RSD</td>
<td>Relative standard deviation</td>
</tr>
<tr>
<td>SCCNFP</td>
<td>Scientific Committee on Cosmetic Products and Non-food Products</td>
</tr>
<tr>
<td>SCCCS</td>
<td>Scientific Committee on Consumer Safety</td>
</tr>
<tr>
<td>SD</td>
<td>Standard deviation</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Description</td>
</tr>
<tr>
<td>--------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>SDS</td>
<td>Sodium dodecyl sulfate</td>
</tr>
<tr>
<td>SED</td>
<td>Systemic exposure dose</td>
</tr>
<tr>
<td>SI</td>
<td>Stimulation index</td>
</tr>
<tr>
<td>SPT</td>
<td>Standard plate test</td>
</tr>
<tr>
<td>TCSA</td>
<td>3,3′,4′,5-Tetrachlorosalicylanilide</td>
</tr>
<tr>
<td>trp</td>
<td>Tryptophane</td>
</tr>
<tr>
<td>UV</td>
<td>Ultraviolet</td>
</tr>
<tr>
<td>UVA</td>
<td>Ultraviolet A</td>
</tr>
<tr>
<td>UVB</td>
<td>Ultraviolet B</td>
</tr>
<tr>
<td>VC</td>
<td>Vehicle control</td>
</tr>
<tr>
<td>VIN</td>
<td>Vinblastine</td>
</tr>
<tr>
<td>VIS</td>
<td>Visible absorption spectroscopy</td>
</tr>
</tbody>
</table>

### 8. LIST OF ABBREVIATIONS

See SCCS/1602/18, 10th Revision of the SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and their Safety Evaluation – from page 141