



# The Skin Sensitization Best Guidance in Practice

## Case study: Thioglycerol

**ICCS BPG Skin Sensitization: Safety Assessment  
Using NAMs for Substances in Cosmetics and  
Personal Care Products Webinar**

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# Overview

- Practical application of the ICCS Best Practice Guidance (BPG) workflow to a specific cosmetic ingredient
- Going through the workflow
  - Problem formulation
  - Data integration
  - Data evaluation
  - Weight of Evidence (WoE)
  - Decision criteria
  - Uncertainty characterization



# The Case Study: Thioglycerol

## 1. Product Scenario

- Company: Lily & Lavender
- Product Type: Leave-on anti-aging face cream
- Ingredient under evaluation: Thioglycerol (CASRN 96-27-5)
- Proposed Concentration: 1% in the final formulation

## 2. The Challenge & Objective

- Primary Goal: Assess skin sensitization risk for the intended use
- Methodological Constraint: Conduct the assessment using only NAMs
- Compliance: Ensure the evaluation meets the requirements for a non-animal safety dossier

## 3. Methodological Framework

- Guidance followed: ICCS Skin Sensitization Best Practice Guidance (BPG)
- Strategic Approach: Utilizing the structured 6-step NGRA workflow
- Focus: Data organization and evidence-based scientific decision-making

INCI name	Thioglycerol
Preferred IUPAC name	3-Sulfanylpropane-1,2-diol
CASRN	96-27-5



# Step 1. Problem Formulation & Scoping

Step 1. Provide a clear statement scope and the hypothesis to be evaluated

1. Problem Formulation & Scoping  
Hazard, Safety, Both

Why?

Specific concerns?

Regulatory considerations

Timing/resource considerations

**Problem statement:**

*Ensure consumer safety before product launch*

1. Is the **ingredient a sensitizer?**
2. If so, which **UN GHS hazard classification** is assigned?
3. Is there an **adequate margin of exposure** for using Thioglycerol at 1% in a face cream when **using the semi-quantitative approach?**
4. Is there an adequate **margin of exposure when using the quantitative approach?**

*to support Go/No-Go decisions*

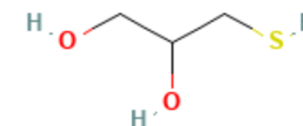
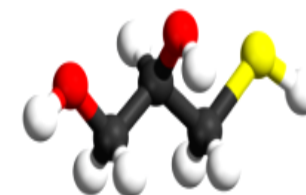


# Step 2. Substance Characterization & Gather Existing Data

## Step 2. Collect data on Thioglycerol

Element	Description
INCI name	Thioglycerol
Synonyms <sup>a</sup>	3-sulfanylpropane-1,2-diol
CASRN <sup>a,b</sup>	96-27-5
Molecular formula <sup>a</sup>	C <sub>3</sub> H <sub>8</sub> O <sub>2</sub> S
Molecular weight <sup>a,b</sup>	108.16 g/mol
Particulate size or size range (if applicable)	Not applicable
Purity	100% for case study
Known impurities	None identified for case study
Potential impurities	None identified for case study
Physical form <sup>a</sup>	Liquid
Water solubility <sup>b</sup>	6.46 mol/L
Partition coefficient	Not available
Vapor pressure <sup>b</sup>	0.00000933 mmHg
Additional physico-chemical properties that impact skin sensitization	None identified for case study
Non-cosmetic uses or exposures <sup>a</sup>	Cleaning agent, preservative

<sup>a</sup> source: PubChem (<https://pubchem.ncbi.nlm.nih.gov/compound/7291>)  
<sup>b</sup> source: EPA ComptoxDashboard (<https://comptox.epa.gov/dashboard/chemical/properties/DTXSID5046512>)



# Step 3. Identify Use Scenario

- Use scenario and exposure amount is an initial step in conducting a safety assessment
  - Not needed for a hazard assessment
- Consumer exposure level (CEL) is calculated for skin sensitization
- Problem formulation considered before evaluating the exposure

**Table 4. Data to Collect to Support Derivation of a Consumer Exposure Level (CEL)**

Element	Description
Product types of interest	[Insert product types to be assessed for the substance] Example: Body lotion and shower gel
Concentration of substance in each product	[Insert the substance amount that will be in each product of interest] Example: 1% in all products (provide data source)
Method and location of application for each product type	[Insert description of application method and intention for leave on/rinse off] Example: Rubbed on body lotion, applied to full body, and then rinsed off
Population, including targeted or special consumer groups (if applicable)	[Insert description of targeted or special consumer group considerations] Examples: substance or product known to be used by children or people with sensitive skin



# Step 3. Identify Use Scenario

## Step 3. Define the exposure scenario to estimate Quantitative Exposure Level of Thioglycerol to the consumer

Element	Description
Product types of interest	Face Cream
Concentration of substance in each product	1%
Method and location of application for each product type	Leave on
Population, including targeted or special consumer groups (if applicable)	General adult (male and female) population



**Assumption:** A deterministic, single product exposure approach is assumed



# Step 3. Identify Use Scenario

## Step 3. Derivation of a Consumer Exposure Level (CEL)

- Calculating dermal exposure using data on previous slide
- Referring to SCCS Notes of Guidance Table 3A

Product and inclusion	Daily amount ( $q$ ) (g/day)	$f_{ret}$
Face cream, 1%	1.54	1.00

$$E_{product} = q \times f_{ret} \quad (\text{Equation 2})$$

Where:

- $E_{product}$  ( $\mu\text{g}/\text{day}$ ) – the daily amount of the cosmetic product to which a user is externally exposed
- $q$  ( $\mu\text{g}/\text{day}$ ) = total amount of product that is applied per day
- $f_{ret}$  = Product-specific retention factor (ranges from 0.01 to 1).

$$E_{product} = 1.54 \times 1.00$$

**1.54 (g/d)**

**Table 3A:** Daily exposure levels for different cosmetic product categories in Europe, calculated by multiplying daily amounts (Hall *et al.*, 2007, 2011) and  $f_{ret}$ .

Product type	Estimated daily amount applied $q_x$ (g/d)	Relative daily amount applied <sup>1</sup> $q_x / bw$ (mg/kg bw/d)	Retention factor <sup>2</sup> $f_{ret}$	Calculated daily exposure $E_{product}$ (g/d)	Calculated relative daily exposure <sup>1</sup> $E_{product} / bw$ (mg/kg bw/d)
<b>Bathing, showering</b>					
Shower gel	18.67	279.20	0.01	<b>0.19</b>	<b>2.79</b>
<b>Hair care</b>					
Shampoo	10.46	150.49	0.01	<b>0.11</b>	<b>1.51</b>
Hair styling products	4.00	57.4	0.10	<b>0.40</b>	<b>5.74</b>
<b>Skin care</b>					
Body lotion	7.83	122.3	1.00	<b>7.83</b>	<b>122.3</b>
Face cream	1.54	24.14	1.00	<b>1.54</b>	<b>24.14</b>
Hand cream	2.16	32.70	1.00	<b>2.16</b>	<b>32.70</b>
<b>Make-up</b>					
Liquid foundation	0.51	7.90	1.00	<b>0.51</b>	<b>7.90</b>
Lipstick, lip salve	0.057	0.90	1.00	<b>0.057</b>	<b>0.90</b>
<b>Deodorant</b>					
Deodorant non-spray	1.50	22.08	1.00	<b>1.50</b>	<b>22.08</b>
Deodorant spray <sup>3</sup>	6.54	93.7	1.00	<b>6.54</b>	<b>93.7</b>
<b>Oral hygiene</b>					
Toothpaste (adult)	2.75	43.29	0.05	<b>0.138</b>	<b>2.16</b>
Mouthwash	21.62	325.40	0.10	<b>2.16</b>	<b>32.54</b>

# Step 3. Identify Use Scenario

## Step 3. Derivation of a Consumer Exposure Level (CEL)

$$E_{dermal} = \left(\frac{C}{100}\right) \times E_{product} \quad \text{(Equation 3)}$$

Where:

- $E_{dermal}$  (µg/day) = the daily amount of the substance to which the skin is exposed
- $C$  (%) = concentration of the substance in the cosmetic product
- $E_{product}$  (µg/day) = the daily amount of the cosmetic product to which a user is externally exposed.

$$E_{dermal} = (1/100) \times 1.54$$

**0.0154 (g/d)**  
**15.4 (mg/d)**  
**15,400 (µg/d)**

**Table 3A:** Daily exposure levels for different cosmetic product categories in Europe, calculated by multiplying daily amounts (Hall *et al.*, 2007, 2011) and  $f_{ret}$ .

Product type	Estimated daily amount applied $q_x$ (g/d)	Relative daily amount applied <sup>1</sup> $q_x / bw$ (mg/kg bw/d)	Retention factor <sup>2</sup> $f_{ret}$	Calculated daily exposure $E_{product}$ (g/d)	Calculated relative daily exposure <sup>1</sup> $E_{product} / bw$ (mg/kg bw/d)
<b>Bathing, showering</b>					
Shower gel	18.67	279.20	0.01	<b>0.19</b>	<b>2.79</b>
<b>Hair care</b>					
Shampoo	10.46	150.49	0.01	<b>0.11</b>	<b>1.51</b>
Hair styling products	4.00	57.4	0.10	<b>0.40</b>	<b>5.74</b>
<b>Skin care</b>					
Body lotion	7.93	122.3	1.00	<b>7.93</b>	<b>122.3</b>
Face cream	1.54	24.14	1.00	<b>1.54</b>	<b>24.14</b>
Hand cream	2.16	32.70	1.00	<b>2.16</b>	<b>32.70</b>
<b>Make-up</b>					
Liquid foundation	0.51	7.90	1.00	<b>0.51</b>	<b>7.90</b>
Lipstick, lip salve	0.057	0.90	1.00	<b>0.057</b>	<b>0.90</b>
<b>Deodorant</b>					
Deodorant non-spray	1.50	22.08	1.00	<b>1.50</b>	<b>22.08</b>
Deodorant spray <sup>3</sup>	6.54	93.7	1.00	<b>6.54</b>	<b>93.7</b>
<b>Oral hygiene</b>					
Toothpaste (adult)	2.75	43.29	0.05	<b>0.138</b>	<b>2.16</b>
Mouthwash	21.62	325.40	0.10	<b>2.16</b>	<b>32.54</b>

# Step 3. Identify Use Scenario

## Step 3. Derivation of a Consumer Exposure Level (CEL)

For a skin sensitization assessment, the  $E_{dermal}$  value in the unit of  $\mu\text{g}/\text{day}$  needs to be normalized by the area of the skin applied. That is, the local dose should be divided by the skin surface area (SSA) to derive a CEL. Equation 4 below presents the method to calculate the CEL:

$$CEL = \frac{E_{dermal}}{SSA} \quad (\text{Equation 4})$$

Where:

- CEL ( $\mu\text{g}/\text{cm}^2$ ) = consumer exposure level
- $E_{dermal}$  ( $\mu\text{g}/\text{day}$ ) = the daily substance amount to which the skin is exposed
- SSA ( $\text{cm}^2$ ) = Skin surface area expected to be exposed to the cosmetic product, based on product use information available in the literature. If the data allow, the 90<sup>th</sup> percentile from a distribution for this parameter should be used.

$$CEL = E_{dermal} / SSA$$

$$15,400 / 565$$

$$27.26 \mu\text{g}/\text{cm}^2$$

**Table 4:** Mean exposed skin surface area per product category (Bremmer *et al.*, 2006a; Bremmer *et al.*, 2006b) and frequency of application per product category

Product type	Surface area for application SSA ( $\text{cm}^2$ )	Body areas	Frequency of application
<b>Bathing, showering</b>			
Shower gel	17500	total body area	1.43/day
Hand wash soap	860	area hands	10/day <sup>3</sup>
Bath oil, salts, etc.	16340	area body- area hands	1/day
<b>Hair care</b>			
Shampoo	1440	area hands+ 1/2 area head	1/day
Hair conditioner	1440	area hands+ 1/2 area head	0.28/day
Hair styling products	1010	1/2 area hands+ 1/2 area head	1.14/day
Semi-permanent hair dyes (and lotions)	580	1/2 area head	1/week (20min.)
Oxidative/ permanent hair dyes	580	1/2 area head	1/month (30min.)
<b>Skin care</b>			
Body lotion	15670	area body-area head (female)	2.28/day
Face cream	565	1/2 area head (female)	2.14/day
(+ applied on back of neck)	80 <sup>2</sup>		
Hand cream	860	area hands	2/day
<b>Make-up</b>			
Liquid foundation	565	1/2 area head (female)	1/day
Make-up remover	565	1/2 area head (female)	1/day



# Step 3. Identify Use Scenario

## Step 3. Dermal Exposure Values for a Face Cream of Thioglycerol to the consumer

Element	Description
Product types of interest	Face Cream
Concentration of substance in each product	1%
Method and location of application for each product type	Leave on
Population, including targeted or special consumer groups	General adult population



Product and Inclusion %	Product Use (g/day)	Skin Surface Area (cm <sup>2</sup> )	Product Exposure (µg/cm <sup>2</sup> )	Substance Exposure (µg/cm <sup>2</sup> )
<b>Face cream, 1%</b>	<b>1.54</b>	<b>565</b>	<b>2726</b>	<b>27.26</b>



## Step 3. Exposure-Based Waiving

- At this phase in a safety assessment, in the absence of substance-specific information or as part of the WoE, the assessor could evaluate if the exposure estimated is such that exposure-based waiving could be implemented
- Exposure-based waiving is when a full quantitative safety assessment is determined unnecessary because the estimated exposure to a chemical is anticipated to be negligible or below a pre-defined safety threshold
- If existing data is available and/or exposure-based waiving is not feasible, the safety assessor should continue through the workflow process

=>

Thioglycerol Exposure ( $\mu\text{g}/\text{cm}^2$ )

27.26



Waiving threshold - Existing Data  
-> Proceed to **Step 4**



# Step 4. Evaluate Existing data

Organize and evaluate existing data regarding reliability, relevancy, and adequacy

Evidence Stream	KE	Data Available?	Result	Outcome P/N/Border
<b>Physico-chemical properties</b>	NA	Yes	MW = 108.02	
<b>ANIMAL</b>				
Buehler	AO	No	N/A	
GPMT	AO	No	N/A	
LLNA	AO	No	N/A	
<b>HUMAN/CLINICAL</b>				
HRIPT	AO	No	N/A	
HMT	AO	No	N/A	
Diagnostic Patch Testing	AO	No	N/A	
<b>IN CHEMICO</b>				
DPRA	MIE/KE1	Yes	% Cysteine (Cys) depletion = 27.3% % Lysine (Lys) depletion = 28.4% Mean of % cys and lys depletion = 27.85%	Positive
ADRA	MIE/KE1	No	N/A	
kDPRA	MIE/KE1	No	N/A	
<b>IN VITRO</b>				
KeratinSens™	KE2	Yes	EC1.5 = 4000 µM EC3 = 4000 µM IC50 = 4000 µM	Negative
LuSens	KE2	No	N/A	
EpiSensA	KE2	Yes	Imax ATF3 = 0 Imax GCLM = 0 Imax DNAJB4 = 0 Imax IL-8 = 0	Negative

Evidence Stream	KE	Data Available?	Result	Outcome P/N/Border
<b>IN VITRO</b>				
hCLAT	KE3	Yes	CD86 EC150 = 813.6 µg/mL CD54 EC200 = NA MIT = 813.6 µg/mL CV75 = 2860.4 µg/mL	Positive
U-SENS	KE3	YYes	CD86 EC150 = 88.2 µg/mL CV70 >200 µg/mL	Positive
IL-8 Luc	KE3	No	Sensitizer	Positive
GARD®skin	KE3	Yes	Mean Decision Value = 0.09831	Borderline -0.450 DV +0.450
Metabolism	No	N/A	NA	
<b>IN SILICO</b>				
Derek Nexus	NA	Yes	Positive, in domain/Thiol or thiol exchange agent	Positive
OECD QSAR Toolbox	NA	Yes	Positive, read-across, in domain (mechanistic)	Positive
<b>ANALOG DATA</b>				
Read-across data	NA	NA		



**Assumption:** We have no animal, human/clinical data, no analogs, and will generate NAM data as needed



# Step 5. Define the approach

## Identify data gaps in the existing data

Defined Approach	Problem Formulation Addressed	Input			<i>In Silico:</i> Derek Nexus, OECD QSAR Toolbox
		KE1: ADRA or DPRA	KE2: KeratinoSens™ EpiSensA or LuSens	KE3: h-CLAT, U-SENS™ GARD™ Skin or IL-8 Luc	
<b>2o3</b>	Hazard (GHS 1 vs GHS NC)	X	X	X	--
<b>ITS</b>	Hazard (GHS 1 vs GHS NC) Potency Category (GHS 1A vs. GHS 1B)	X	--	X	X
<b>SARA-ICE</b>	Inputs	KE1: DPRA, kDPRA	KE2: KeratinoSens™	KE3: h-CLAT, U-SENS™	--
	Point of Departure (ED <sub>01</sub> )	X	X	X	--

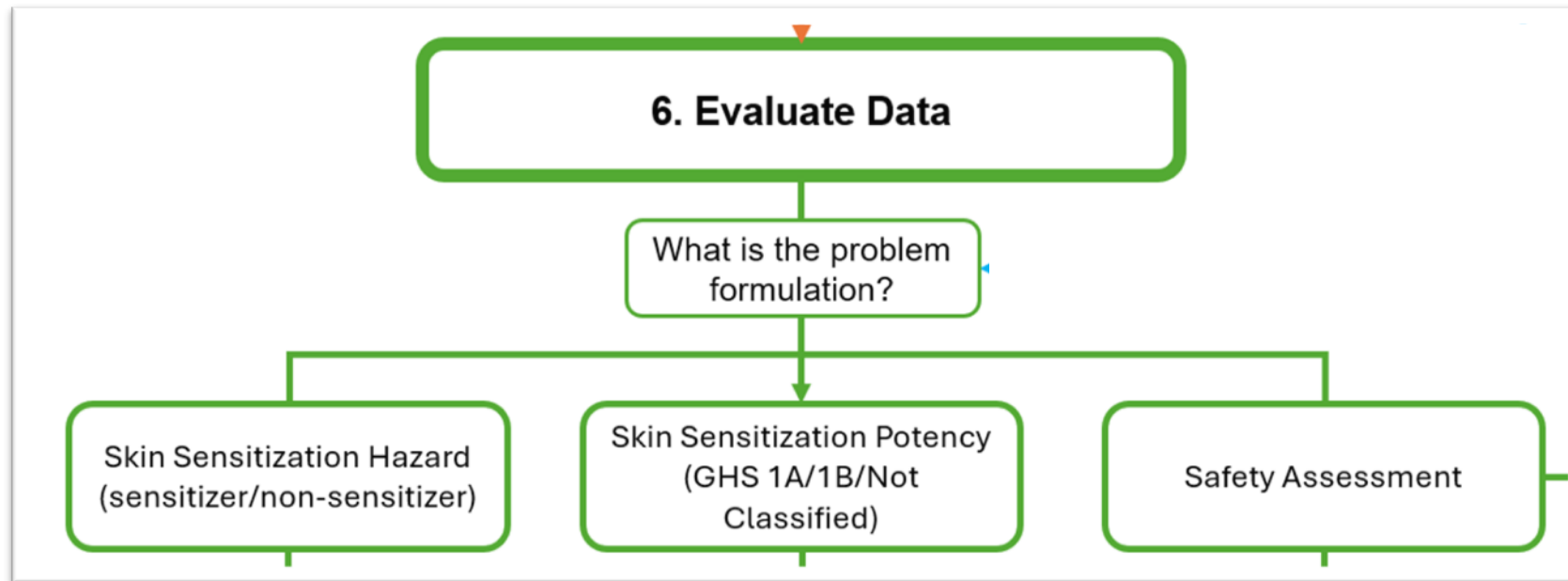
X = inputs permitted in DA

- Available KE1–3 and *in silico* data support the use of Defined Approaches (DA)
- DAs will be used to determine hazard, potency, and the Point of Departure (PoD)



# Step 6. What is the Problem Formulation?

## Hazard, Potency or Safety Assessment



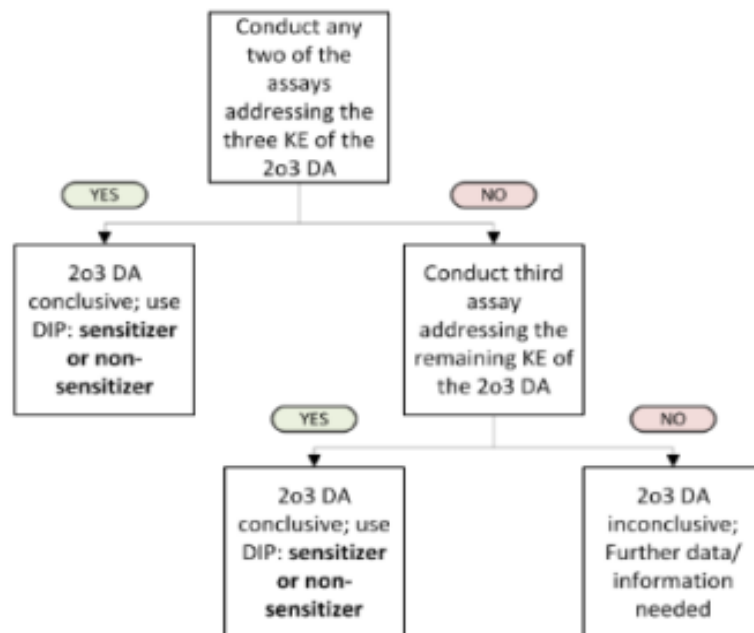
Identify and apply the most appropriate assessment approach based on the problem formulation



# Step 6. Is Thioglycerol a sensitizer?

## Hazard Assessment

Defined Approach	Problem Formulation Addressed	KE1: ADRA or DPRA	KE2: KeratinoSens™ EpiSensA or LuSens	KE3: h-CLAT, U-SENS™ GARD®Skin or IL-8 Luc
<b>2o3</b>	Hazard (UN GHS 1 vs NC)	X	X	X
Existing Data		DPRA : Positive	KeratinoSens™: Negative EpiSensA: Negative	h-CLAT: Positive U-SENS™: Positive



- Test 2 assays: If they match, the conclusion is final
- If they differ: Conduct a 3rd assay as a tie-breaker
- Majority rule: The final result is the 2-out-of-3 consensus

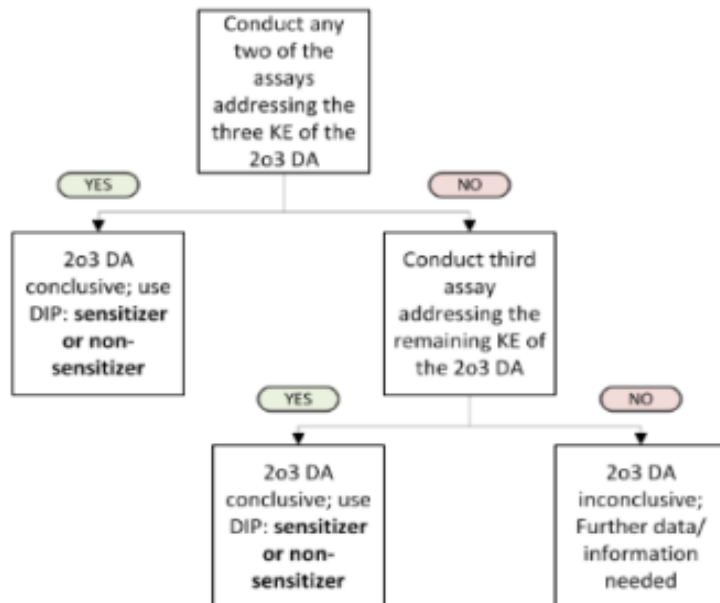
<b>2 out of 3 Conclusion</b>	KE1 Positive KE2 Negative KE3 Positive	<b>SENSITIZER</b>
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# Step 6. Is Thioglycerol a sensitizer?

## Borderline - Hazard Assessment

Defined Approach	Problem Formulation Addressed	KE1: ADRA or DPRA	KE2: KeratinoSens™ EpiSensA or LuSens	KE3: h-CLAT, U-SENS™ GARD®Skin or IL-8 Luc
<b>2o3</b>	Hazard (UN GHS 1 vs NC)	X	X	X
Existing Data		DPRA : Positive	KeratinoSens™: Negative EpiSensA: Negative	GARD®Skin : Borderline



- KE1 & KE2 : Non concordant
- KE 3: GARD®skin
  - **Result:** Mean Decision Value (DV) of **0.09831**
  - Check Borderline Range: **-0.450 to +0.450**
  - Status: The value **0.09831** falls directly **within the Borderline Range**
- KE1 – KE3 : Majority rule not met

**2 out of 3**  
**Conclusion**

KE1 Positive  
KE2 Negative  
KE3 Borderline

**INCONCLUSIVE**



# Step 6. Potency of Thioglycerol?

Determine the Potency using the OECD ITS approach

Information Source Type	KE1 (TG 442C)	KE3 (TG 442E)	<i>In silico</i>
Score	DPRA Mean Cys & Lys % depletion	h-CLAT MIT (µg/mL)	U-SENS™ CD86 EC150 (µg/mL)
3	≥42.47	≤10	≤3
2	≥22.62, <42.47	>10, ≤150	>3; ≤35
1	≥6.38, <22.62	>150, ≤5000	>35; <200
0	<6.38	Not calculated	not calculated (≥200)
			Derek Nexus/ OECD QSAR Toolbox
<b>Hazard</b>	<b>Potency</b>	<b>Total Score from ITS DA</b>	
Sensitizer	UN GHS 1A	6-7	
Sensitizer	UN GHS 1B	2-5	
Non Sensitizer	NC	0-1	

DPRA	Mean of % cys and lys depletion = <b>27.85%</b>
h-CLAT	MIT = <b>813.6 µg/mL</b>
U-SENS	CD86 EC150 = <b>88.2 µg/mL</b>

- **Three Sources:** Combines KE1, KE3 & *in silico* data
- **Threshold:** Requires at least two applicable sources for a conclusion
- **Scenario 1:** All three information sources are valid and in domain

<b>ITS</b>	KE1	Score <b>2</b>	<b>SENSITIZER</b> <b>UN GHS 1B</b>
	KE3	Score <b>1</b>	
	<i>In silico</i>	Score <b>1</b>	
	<b>Total Score</b>	<b>4</b>	
<b>Conclusion</b>			

## Data interchangeability & Consistency

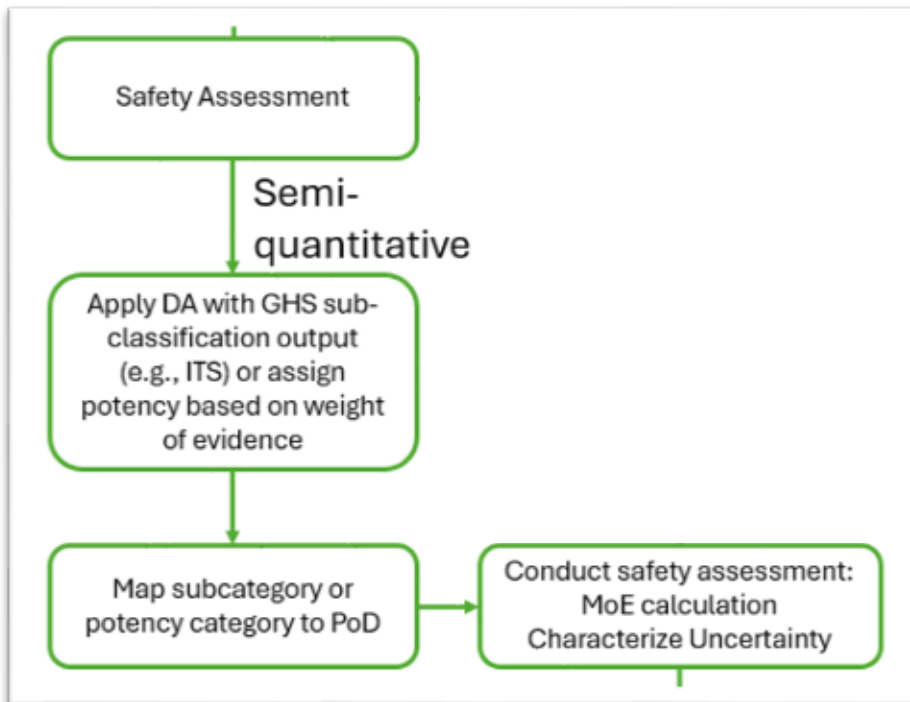
- *In silico* ITS v1 (Derek Nexus) vs ITS v2 (OECD QSAR Toolbox)
- *In vitro* KE3 (h-CLAT or U-SENS™)
- **Outcome :** Identical conclusions reached

**Conclusion:** The high level of agreement between different models and assays reinforces the confidence in the overall hazard and potency assessment



# Step 6. Semi Quantitative Assessment

Determine the Potency using the OECD ITS approach



- **Challenge:** Some DAs provide qualitative results instead of quantitative values
- **Solution:** Convert UN GHS subcategories (1A/1B) into a quantitative  $POD_{NAM}$
- **Method:** Use conservative MoE (e.g., Gilmour et al., 2023)
- **UN GHS 1B** implies an **LLNA EC3 > 2% or HRIPT > 500  $\mu\text{g}/\text{cm}^2$**
- **Conservative NESIL value** : at the lower bound of 500  $\mu\text{g}/\text{cm}^2$  to ensure safety

## Margin of Exposure (MoE) Calculation:

- Consumer Exposure Level (CEL): 27.26  $\mu\text{g}/\text{cm}^2$  (from Slide 10)
- Formula:  $MoE = NESIL \text{ Value} / CEL = 500 / 27.26 = 18.34$

## Historically applied Safety Assessment Factors (SAFs)

- Products applied to face 100 (Api et al. (2020))

PoD Source	POD Value ( $\mu\text{g}/\text{cm}^2$ )	Consumer Exposure ( $\mu\text{g}/\text{cm}^2$ )	MoE	Acceptable MoE	Outcome
Semi-quantitative	500	27.26	18.34	100	Inadequate MoE

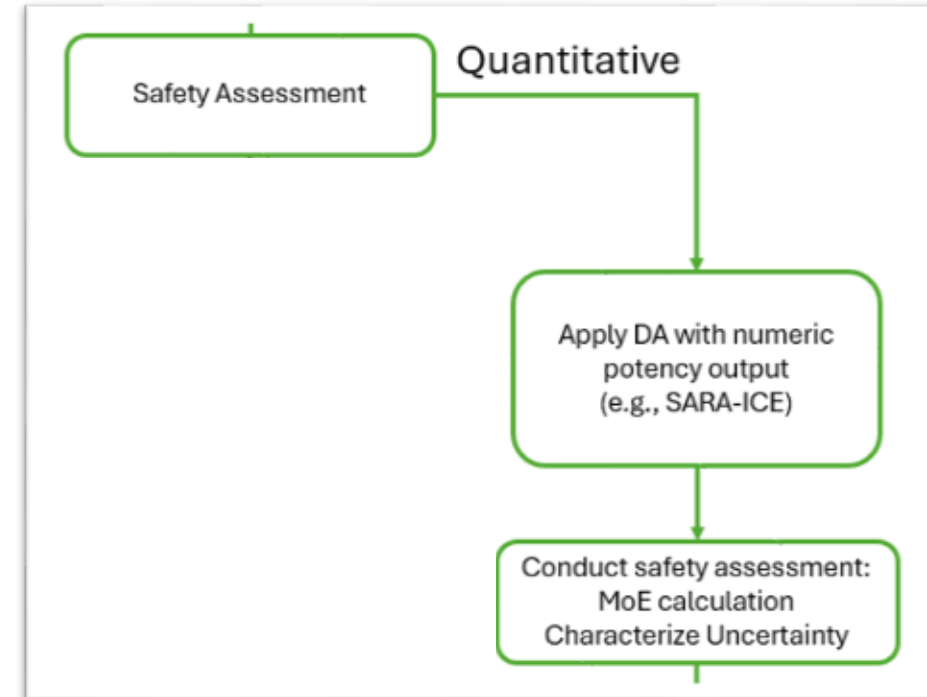
Using the semi-quantitative approach, an inadequate MoE is predicted if thioglycerol is included at 1% in an anti-aging face cream



# Step 6. Quantitative Assessment

Determine a precise numerical safety limit for an ingredient

- **Key Metric (PoD):** Identifies a Point of Departure (PoD), which is the specific dose below which no significant risk of sensitization is expected
  - NESIL : No Expected Sensitization Induction Level, or
  - ED01 : Effective Dose for 1% risk
- **Data Integration:** Combines results from multiple NAMs (*in chemico*, *in vitro*, *in silico*) into a single numerical value using a quantitative DA
- **Risk Characterization (MoE):** Compares the PoD to the Consumer Exposure Level (CEL) to calculate the Margin of Exposure (MoE)
  - $MOE = PoD / CEL$
- **Source:** Calculated by statistical models like **SARA-ICE** DA (OECD TG 497) using *in chemico*, *in vitro* and *in silico* inputs



# Step 6. Quantitative Assessment

## Step 6. SARA-ICE OECD TG 497 DA (version 1.0)

Evidence Stream	KE	Result	Inputs
Physico-chemical properties	NA	MW = 108.02	Y
<b>IN CHEMICO</b>			
DPRA	MIE/KE1	% Cysteine depletion = 27.3% % Lysine depletion = 28.4% Mean of % cys and lys depletion = 27.85%	Y
<b>IN VITRO</b>			
KeratinoSens™		EC1.5 = 4000 µM EC3 = 4000 µM IC50 = 4000 µM	Y
EpiSensA	KE2	Imax ATF3 = 0 Imax GCLM = 0 Imax DNAJB4 = 0 Imax IL-8 = 0	Non eligible
hCLAT		CD86 EC150 = 813.6 µg/mL CD54 EC200 = NA MIT = 813.6 µg/mL CV75 = 2860.4 µg/mL	Incomplete data
U-SENS	KE3	CD86 EC150 = 88.2 µg/mL CV70 >200 µg/mL	Y
GARD®skin		Mean Decision Value = 0.09831	Non eligible

Data Source included : MW, DPRA (KE1), KeratinoSens™ (KE2), U-SENS™ (KE3)

- h-CLAT data was excluded due to the missing CD54 EC200 endpoint
- GARD®skin & EpiSensA excluded by design, not a parameter in the algorithm

### Results

- Model Output: **Point of Departure (PoD / ED01) = 7,000 µg/cm<sup>2</sup>**
- Represents the dose associated with a **1%** chance of skin sensitization

Substance	CASRN	POD	ED <sub>01</sub> 5th	ED <sub>01</sub> 50th	ED <sub>01</sub> 95th
thioglyc	96-27-5	7,000	290	9,900	50,000

### Margin of Exposure (MoE) Calculation:

- $MoE = PoD \text{ Value} / CEL = 7,000 / 27.26 = 257$

PoD Source	POD Value (µg/cm <sup>2</sup> )	CEL (µg/cm <sup>2</sup> )	MoE	Acceptable MoE	Outcome
Quantitative	7,000	27.26	257	100	Adequate MoE

Using the quantitative approach, adequate MoE is predicted if thioglycerol is included at 1% in an anti-aging face cream.



• ED<sub>01</sub> 5th — 5th Percentile of the ED<sub>01</sub> distribution (µg/cm<sup>2</sup>)  
 • ED<sub>01</sub> 50th — 50th Percentile of the ED<sub>01</sub> distribution (µg/cm<sup>2</sup>)  
 • ED<sub>01</sub> 95th — 95th Percentile of the ED<sub>01</sub> distribution (µg/cm<sup>2</sup>)

# Step 6. Quantitative Assessment

## Step 6. SARA-ICE DA - Impact of the Data Source e.g. for KE2

Evidence Stream	KE	Result
Physico-chemical properties	NA	MW = 108.02
IN CHEMICO		
DPRA	MIE/KE1	% Cysteine depletion = 27.3% % Lysine depletion = 28.4% Mean of % cys and lys depletion = 27.85%
IN VITRO		
KeratinoSens™	KE2	EC1.5 = 4000 µM EC3 = 4000 µM IC50 = 4000 µM
		EC1.5 > 2000 µM IC50 = 2000 µM
U-SENS™	KE3	CD86 EC150 = 88.2 µg/mL CV70 > 200 µg/mL

### KeratinoSens™ Logic:

- Result: EC1.5 > 2000 µM (No induction)
- Viability: IC50 = 2000 µM (Cytotoxicity at top dose only)
- Non-sensitizing for Key Event 2

### Quantitative Outcome:

- **Input Strategy:** Combined DPRA, U-SENS™, and revised KeratinoSens™ input
- **With EC1.5 > 2000 µM:** Derived **PoD of 6,700 µg/cm<sup>2</sup>** results in an **MoE of 245**
- **With EC1.5 = 4000 µM:** The MoE would slightly increase (approaching 257)

Substance	CASRN	POD	ED <sub>01</sub> 5th	ED <sub>01</sub> 50th	ED <sub>01</sub> 95th
thioglyc	96-27-5	6,700	270	9,400	50,000

**Final Safety Verdict:** Both scenarios yield an **MoE >> 100**

**Outcome:** The safety conclusion remains **identical and stable**.

The ingredient is safe at 1%, and the high MoE provides a comfortable safety buffer regardless of the upper concentration limit used in the model



# Step 7. Uncertainty characterization

## Ensuring Confidence in Safety

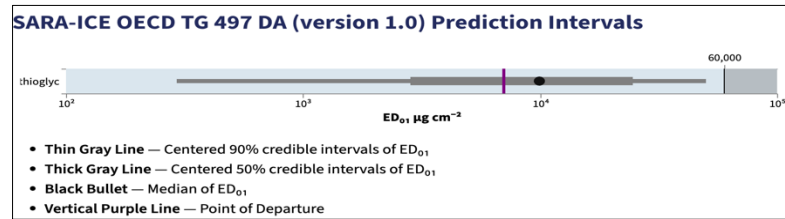
- **Objective:** Identify uncertainty sources and assess their impact on the final safety conclusion
- **Exposure Assessment (Conservative Bias):**
  - Estimates rely on SCCS default assumptions (product amount, frequency, use patterns)
  - **Impact:** Likely overestimates actual consumer exposure, providing an inherent safety buffer
- **Methodological Robustness:**
  - **Assay Scope:** While individual NAMs target specific Key Events (KEs) rather than the full biology, they are applied within a validated Integrated Testing Strategy (ITS)
  - **Assay variability:** All test methods, whether in vivo or in vitro, will have implicit variability. Note, this is explicitly modelled in the SARA-ICE DA.
  - **Regulatory Alignment:** Methods are standardized (OECD) with well-characterized performance
- **Overall Confidence:**
  - Residual uncertainties are well-understood and transparently documented
  - **Conclusion:** Collective uncertainty does not compromise the safety conclusion

**THE ASSESSMENT REMAINS PROTECTIVE OF HUMAN HEALTH**



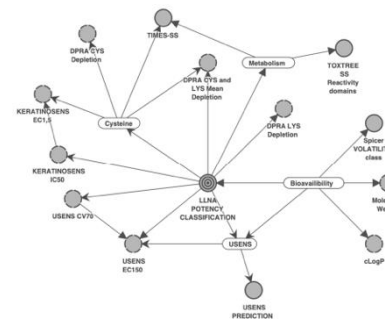
# Step 7. Uncertainty

## SARA-ICE Predictions Intervals & Other Prediction Tools Analyses



- **Prediction Range (ED01):** Credible interval for Thioglycerol is **290 to 50,000 µg/cm<sup>2</sup>** (5th–95th percentile)
- **Uncertainty Width:** A variance of several orders of magnitude is typical for SARA-ICE DA outputs, capturing e.g. inherent variability in assay input data and human variability
- **Driving Factors:** Uncertainty reduction depends on the **number, type, and concordance** of the input data.
- **Methodological Compliance:**
  - Meets OECD TG 497 requirements (minimum of **2 KEs**)
  - **Uncertainty Reduction:** Achieved by integrating three high-quality inputs: **DPRA**, **KeratinoSens™**, and **U-SENS™**

### Non-OECD approaches were evaluated



### SkinSens-BN probability profile

p(NS) 0.16 - p(weak) 0.63

p(moderate) 0.19 - p(strong/extreme) 0.02

PoD<sub>BN</sub> = 22.33 % (weak)

**PoD<sub>BN</sub> = 5582 µg/cm<sup>2</sup>**

**MoE = PoD<sub>BN</sub> / CEL = 5582 / 27.26 = 204 >> 100**

Toumeix et al. Toxics. 2024 doi: 10.3390/toxics12080536

**Model Alignment:** Other models yielded similar PoDs and adequate MoEs

**Concordance:** High agreement across diverse tools significantly reduces uncertainty



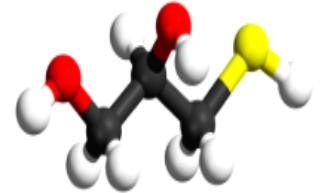
# Problem Formulation & Conclusion

*Ensure consumer safety before Thioglycerol product launch at 1% in a face cream*

## 1. Hazard Identification

- Sensitizer? **YES**
- UN GHS hazard classification? **UN GHS 1B**

INCI name	Thioglycerol
Preferred IUPAC name	3-Sulfanylpropane-1,2-diol
CASRN	96-27-5



## 2. Risk Characterization

- **Semi-Quantitative Approach**: **✗ Inadequate** (MoE = 18)
  - *GHS class-specific PoD more likely to be conservative*
- **Quantitative Approach** (SARA-ICE DA V1.0): **✓ Adequate** (MoE = 245)
  - *Chemical-specific PoD evidence confirms safety with an accepted MOE > 100*



**GO for Product Launch**

The 1% concentration is safe for use in anti-aging face cream



# THANK YOU!



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