

ability natural row want technology Activity
sustainability benefits Ecocert leuconostoc
moisture Cosmos condition peptide
Improving solar choice antimicrobial

Leucidal® Liquid Complete

Code Number: M15024

INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus
& Cocos Nucifera (Coconut) Fruit Extract

Table of Contents

Click on the logo to return
to the Table of Contents

I. Technical Data Sheet

II. Specification Sheet

III. Compositional Breakdown

IV. Efficacy Tests

- a. Moisturization Assay
- b. TEWL Assay
- c. High Resolution Ultrasounds Skin Imaging Assay
- d. Minimum Inhibition Concentration (MIC) Data
- e. Challenge Test with 4.0% Leucidal® Liquid Complete
- f. Challenge Test with 2.0% Leucidal® Liquid Complete
- g. Time Kill Test

V. Safety Information

- a. Safety Statement
- b. *in-vitro* Dermal and Ocular Irritation Tests
- c. Direct Peptide Reactivity Assay
- d. OECD 442D TG *in-vitro* Skin Sensitization
- e. Bacterial Reverse Mutation Test
- f. OECD 202 Acute Daphnia Assay
- g. OECD 301B Ready Biogradability Assay
- h. Allergen Statement
- i. Heavy Metals Statement

VI. Certificate of Origin

VII. Material Safety Data Sheet (GHS SDS)

VIII. Additional Documentation

- a. Manufacturing Flow Chart
- b. Certificate of Compliance
- c. ECOCERT and COSMOS

Leucidal® Liquid Complete Code Number: M15024

INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus
& Cocos Nucifera (Coconut) Fruit Extract



Leucidal® Liquid Complete

Patents Pending: Application Number 62/139,908 & 62/013,669

Technical Data Sheet

BACKGROUND

Active Micro Technologies prides themselves on developing and supplying effective, natural products that deliver skin and hair conditioning benefits, along with providing natural antimicrobial activity. As our original antimicrobial product line and effective antifungal booster continue to lead the natural antimicrobial market, a convenient broad-spectrum antimicrobial mixture with efficacy against bacteria, yeast and mold has been developed to provide full protection in one product. **Leucidal® Liquid Complete** combines the antibacterial power of **Leucidal® Liquid** and the antifungal power of **AMTicide® Coconut** to deliver an effective and convenient one step solution! This highly marketable product can provide moisturizing and conditioning benefits in hair and skin care applications. **Leucidal® Liquid Complete** is effective at preventing the growth of bacteria and fungi, including yeast and mold, making it the perfect addition to any formulation.

SCIENCE

Leucidal® Liquid Complete is a mixture of antimicrobial peptide technology. One type of the antimicrobial peptides is originally derived from the lactic acid bacteria, *Leuconostoc kimchii*. *L. kimchii* is one of 15 species of microorganisms that make up the mixed culture used for producing the Korean dietary staple known as kimchi, a type of fermented cabbage.

L. kimchii is capable of restricting the growth of other microorganisms by acidifying its environment, but as is common in nature, it is not content to limit itself to a single mechanism of defense. In addition to acidifying its environment, it also produces a novel antimicrobial peptide.

Using modern fermentation and bioprocessing technology, Active Micro Technologies has commercialized this antimicrobial peptide to produce **Leucidal® Liquid Complete**.



Code Number: M15024

INCI Nomenclature:

Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract

INCI Status: Conforms

REACH Status: Compliant

CAS Number: 84775-94-0 & 68333-16-4 & 8001-31-8

EINECS Number: 283-918-6 & N/A & 232-282-8

Origin: Biotechnology/Botanical:

Leuconostoc kimchii & Raphanus Sativus & Lactobacillus & Cocos nucifera

Processing:

GMO Free

No Ethoxylation

No Irradiation

No Sulphonation

No Ethylene Oxide treatment

No Hydrogenation

Additives: None

-Preservatives: None

-Antioxidants: None

Other additives: None

Solvents used: Water

Appearance: Clear to Hazy Liquid

Soluble/Miscible: Water Soluble

Suggested Use Levels: 2.0 - 4.0%

Suggested Applications:

Moisturizing, Skin/Scalp Conditioning, Antimicrobial

Leucidal® Liquid Complete

Patents Pending: Application Number 62/139,908 & 62/013,669

The other type of antimicrobial peptide is created from fermenting *Cocos nucifera* (Coconut) with *Lactobacillus*. Coconut oil has been traditionally used to treat skin disorders, yeast infections, ringworm, and even athlete's foot. About 50% of the total fatty acid content of coconut oil are medium chain triglycerides (MCT's) that exhibit natural antifungal activity. MCT's, such as lauric acid, work by disrupting the cellular structures of fungus and destroying them before they can wreak havoc. During the fermentation process, lipopeptides are catabolized by the MCT's present in coconut flesh. Active Micro Technologies has harnessed natural phytochemicals and lipopeptides from coconut to produce a novel antifungal material.

Natural antimicrobial products are similar to synthetic preservative systems in that they are effective against bacteria, however most natural antimicrobial products lack broad-spectrum effectiveness against bacteria and fungi, specifically yeast and mold. **Leucidal® Liquid Complete** uses a combination of peptide technology to deliver moisturizing and conditioning benefits as well as providing broad-spectrum activity to protect against bacteria, yeast, and mold in one product.

BENEFITS

A skin moisturization study was performed using an untreated control, generic cream base, and an experimental with the same cream base containing 2.0% **Leucidal® Liquid Complete**. The average increase in moisturization is in Figure 1 below.

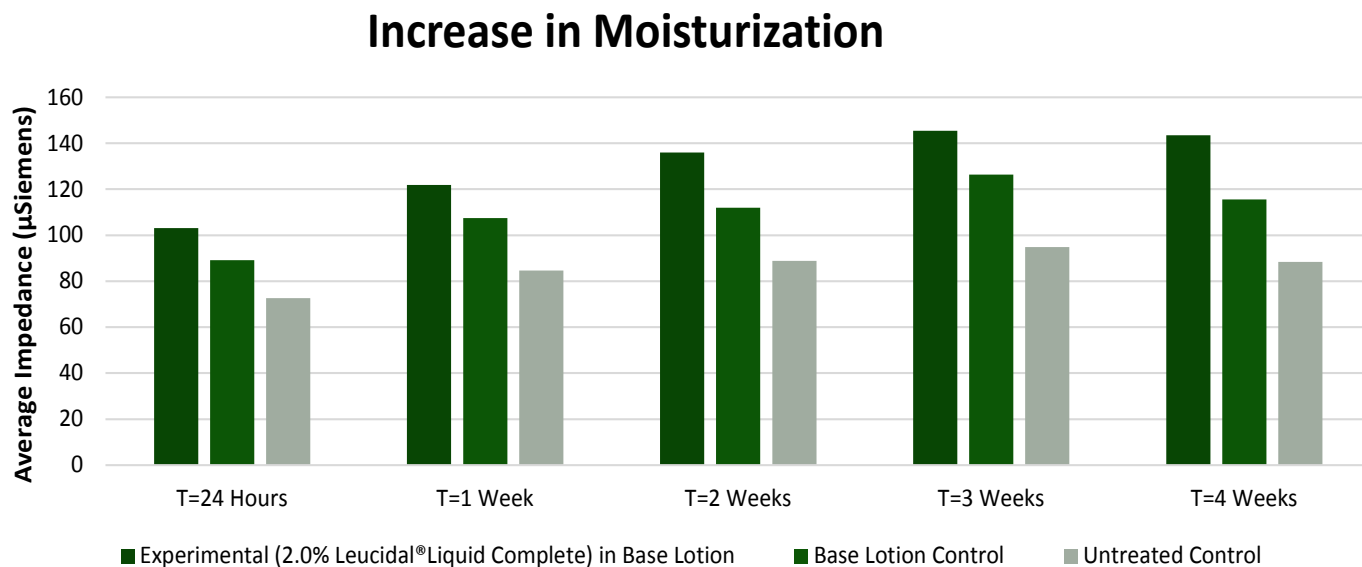


Figure 1. Increase in Moisturization for **Leucidal® Liquid Complete**.

Leucidal® Liquid Complete

Patents Pending: Application Number 62/139,908 & 62/013,669

Comparative moisturization results from this study are shown in Figure 2. As demonstrated by the results of this study, the addition of 2.0% **Leucidal® Liquid Complete** improved moisture levels by 42.01% after 24 hours and by 62.33% after four weeks when compared to the untreated control. When compared to the base cream **Leucidal® Liquid Complete** improved moisturization by 14.38% and after 24 hours and by 24.13% after four weeks. Based on these results, adding this innovative product provides the formulator the opportunity to capitalize on both the natural antimicrobial properties of **Leucidal® Liquid Complete**, as well as its ability to provide potent moisturizing benefits to the cosmetic formulation. These properties make it ideal for applications addressing numerous skin and scalp conditions.

Comparative Moisturization

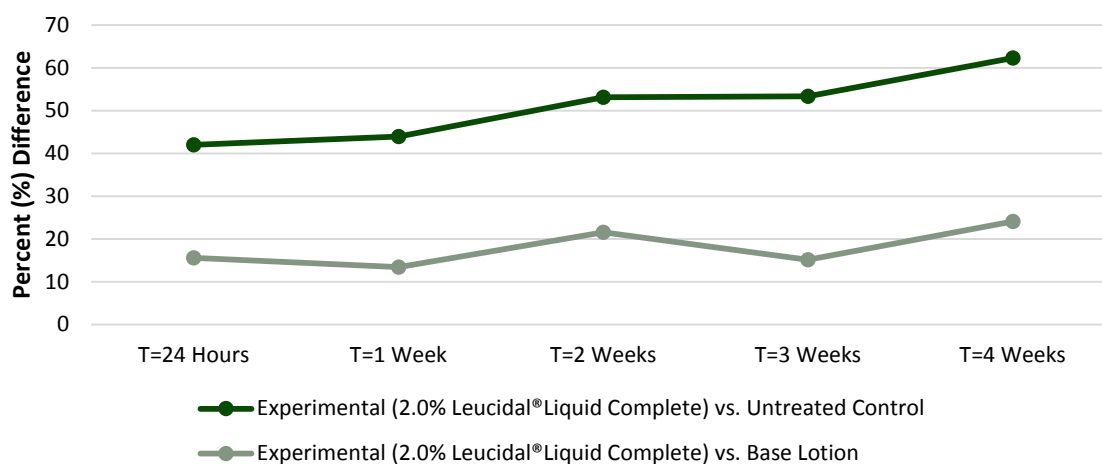


Figure 2. Percent Difference in Moisturization for **Leucidal® Liquid Complete**.

One of the first steps in the development of **Leucidal® Liquid Complete** was to determine the product's potential ability to inhibit the growth of a variety of bacteria and fungi. Using standard serial dilution protocols in growth media, the Minimum Inhibitory Concentrations (MICs) for **Leucidal® Liquid Complete** were determined for a variety of bacterial and fungal organisms. The results of these tests are shown in Figure 3.

Microorganism Tested	MIC (%)
<i>E. coli</i>	2.00
<i>P. aeruginosa</i>	0.50
<i>S. aureus</i>	2.00
<i>A. brasiliensis</i>	0.50
<i>C. albicans</i>	0.50

Figure 3. MIC data for **Leucidal® Liquid Complete**.

Leucidal® Liquid Complete

Patents Pending: Application Number 62/139,908 & 62/013,669

The positive MIC screening results warranted further testing to confirm its ability to provide product preservation. A Double Challenge Test was completed using 2.0% **Leucidal® Liquid Complete** in a generic cream base formulation. Samples were inoculated with *E. coli*, *P. aeruginosa*, *S. aureus*, *C. albicans*, and *A. brasiliensis*. During the first 28-day incubation period, samples were periodically collected and tested for the presence of these microorganisms. Following this initial 28 days of incubation, the cream samples were then re-inoculated with the microbial cultures and sampled over an additional 28-day period. Figure 4 shows the positive preservation results for **Leucidal® Liquid Complete**.

	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
Inoculum (initial)	5.2x10 ⁶	7.3x10 ⁶	6.5x10 ⁶	1.8x10 ⁵	2.2x10 ⁵
Day 0	99.999%	99.999%	99.999%	99.999%	99.981%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated)	6.3x10 ⁶	5.1x10 ⁶	3.3x10 ⁶	1.5x10 ⁵	3.1x10 ⁵
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Figure 4. Challenge Test results for Generic Cream Formula pH 5 with 2% **Leucidal® Liquid Complete** inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

USE RECOMMENDATIONS

As with all biological materials, attention must be paid to the conditions under which **Leucidal® Liquid Complete** is used. Based on bench-scale evaluations, as well as actual product applications, **Leucidal® Liquid Complete** has been found to be effective over a wide range of typical cosmetic and personal care product manufacturing conditions. **Leucidal® Liquid Complete** has been found to be heat stable up to 70°C and active under both acidic (pH 3) and basic (pH 8) conditions.

Leucidal® Liquid Complete can be hazy at cooler temperatures, therefore it is recommended to warm the full container of product to 35-40°C and mix until clear prior to use.

Page 4 of 4

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107 Technology Drive • Lincolnton, NC 28092
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Specification

Product Name: Leucidal® Liquid Complete
Code Number: M15024
CAS #'s: 84775-94-0 & 68333-16-4 & 8001-31-8
EINECS #'s: 283-918-6 & N/A & 232-282-8
INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract

Specification	Parameter
Appearance	Clear to Hazy Liquid
Color (Gardner)	6 Maximum
Odor	Characteristic
pH	5.0 – 9.0
NVM (1g-105°C-1hr)	37.0 – 46.0%
Phenolics (tested as Salicylic Acid) ¹	14.0 – 17.0%
Heavy Metals	< 20 ppm
Arsenic	< 2 ppm
Minimum Inhibitory Concentration ² Organism (ATCC#)	
E. coli (#8739)	0.50 – 4.00%
S. aureus (#6538)	0.25 – 2.00%
P. aeruginosa (#9027)	0.25 – 2.00%
C. albicans (#10231)	0.25 – 2.00%
A. brasiliensis (#16404)	0.25 – 2.00%

DO NOT FREEZE; Store at or near room temperature;
Prior to use, container must be warmed to 35 - 40°C and mixed until clear.
May sediment upon standing

Note:

- 1) Phenolic compounds of natural origin, tested as Salicylic acid via USP HPLC method.
- 2) Refer to Inhibition Activity Data

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Compositional Breakdown

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Leucidal® Liquid Complete Code: M15024

Compositional Breakdown:

Ingredient	%
Water	37.50
Leuconostoc/Radish Root Ferment Filtrate	37.50
Lactobacillus	20.00
Cocos Nucifera (Coconut) Fruit Extract	5.00

- To our knowledge the above material is free of the following list of heavy metals:
 - Heavy Metals < 20 ppm (Max.)
 - Lead < 10 ppm (Max.)
 - Antimony < 5 ppm (Max.)
 - Arsenic < 2 ppm (Max.)
 - Mercury < 1 ppm (Max.)
 - Cadmium < 1 ppm (Max.)



Compositional Breakdown

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This is to certify that Leucidal® Liquid Complete does not contain allergen levels exceeding the following (Gas Chromatography-Mass Spectrometer Coupled):

ALLERGENS Dir 2003 15 CEE		
INCI NAME	CAS NUMBER	Limit (ppm)
Alpha-IsoMethyl Ionone	127-51-5	< 0.02
Amyl Cinnamal	122-40-7	< 0.10
Anise Alcohol	105-13-5	< 0.00
Benzyl Alcohol	100-51-69	< 0.01
Benzyl Benzoate	120-51-4	< 0.09
Benzyl Cinnamate	103-41-3	< 0.30
Benzyl Salicylate	118-58-1	< 0.06
Butylphenyl Methylpropional	80-54-6	< 0.50
Cinnamal	104-55-2	< 0.01
Cinnamyl Alcohol	104-54-1	< 0.30
Citral	5392-40-5	< 1.00
Citronellol	106-22-9	< 1.00
Coumarin	91-64-5	< 0.00
Eugenol	97-53-0	< 0.70
Farnesol	4602-84-0	< 0.04
Geraniol	106-24-1	< 0.08
Hexyl Cinnamal	101-86-0	< 0.40
Hydroxycitronellal	107-75-5	< 1.00
Hydroxymethylpentyl 3-Cyclohexene carboxaldehyde	31906-04-4	< 0.30
Isoeugenol	97-54-1	< 0.06
Limonene	5989-27-5	< 0.05
Linalool	78-70-6	< 0.00
Methyl 2 Octynoate	111-12-6	< 0.20
Evernia prunastri	90028-68-5	< 0.02
Evernia furfuracea	90028-67-4	< 0.00
Amylcinnamyl Alcohol	101-85-9	< 1.00

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This is to certify that Leucidal® Liquid Complete does not contain pesticide levels exceeding the following (Reverse Phase High Performance Liquid Chromatography-Mass Spectrometer Coupled):

EPA Pesticide Levels	
INCI NAME	LIMIT (mg/kg)
Alachlor	< 0.02
Aldrin and Dieldrin	< 0.05
Azinphos-methyl	< 1.00
Bromopropylate	< 3.00
Chlordane(cis and trans)	< 0.05
Chlorfenvinphos	< 0.50
Chlorpyrifos	< 0.20
Chlorpyrifos-methyl	< 0.10
Cypermethrin	< 1.00
DDT	< 1.00
Deltamethrin	< 0.50
Diazinon	< 0.50
Dichlorvos	< 1.00
Dithiocarbamates	< 2.00
Endosulfan	< 3.00
Endrin	< 0.05
Ethion	< 2.00
Fenitrothion	< 0.50
Fenvalerate	< 1.50
Fonofos	< 0.05
Heptachlor	< 0.05
Hexachlorobenzene	< 0.10
Hexachlorocyclohexane	< 0.30
Lindane	< 0.60
Malathion	< 1.00
Methidathion	< 0.20

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Compositional Breakdown

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Parathion	< 0.50
Parathion-methyl	< 0.20
Permethrin	< 1.00
Phosalone	< 0.10
Piperonyl butoxide	< 3.00
Pirimiphos-methyl	< 4.00
Pyrethrins	< 3.00
Quintozene(sum of 3 items)	< 1.00



Moisturization/Hydration Assay

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1777

Lot #: 5013

Sponsor: Active Micro Technologies, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed:

Moisturization/Hydration Assay

Introduction

An *in-vivo* study was conducted over a period of four weeks to evaluate the moisturization benefits **Leucidal® Liquid Complete**. 10 M/F subjects between the ages of 23-45 participated in the study. Results indicate that this material is capable of significantly increasing moisturization compared to the control.

The moisturization assay was conducted to assess the moisturizing ability of **Leucidal® Liquid Complete**.

Materials

A. Equipment: DermaLab Skin Combo (Hydration/ Moisture Pin Probe)

The moisture module provides information about the skin's hydration by measuring the conducting properties of the upper skin layers when subjected to an alternating voltage. The method is referred to as a conductance measurement and the output is presented in the unit of uSiemens (uS). A moisture pin probe is the tool used to gather hydration values.

10 volunteers M/F between the ages of 23 and 45 and who were known to be free of any skin pathologies participated in this study. A Dermalab Corneometer was used to measure the moisture levels on the subject's volar forearms. The Corneometer is an instrument that measures the amount of water within the skin. The presence of moisture in the skin improves conductance therefore results in higher readings than dry skin. Therefore the higher the levels of moisture, the higher the readings from the Corneometer will be. Baseline moisturization readings were taken on day one of the study.

Following initial measurements, all subjects were asked to apply 2 mg of each test material on their volar forearms. Measurements were taken immediately after application of test materials and then weekly for 4 weeks. The test material consisted of 2% **Leucidal® Liquid Complete** in a base lotion.

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Moisturization/Hydration Assay

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For added perspective, measurements of an untreated test site and a site treated with a base lotion (Cetaphil Moisturizing for All Skin Types) were recorded.

Results

Leucidal® Liquid Complete showed high moisturizing capabilities at a 2.0% concentration. Please note that each value is an average of three consecutive readings per test site.

Moisturization		T=0	T= 24 Hours	T = 1 Week	T = 2 Weeks	T= 3 Weeks	T= 4 Weeks
Panelist 1	Experimental	65	110	130	151	157	170
	Base Lotion	57	100	119	125	140	148
	Untreated	42	49	47	53	51	50
Panelist 2	Experimental	53	95	119	131	166	165
	Base Lotion	47	84	100	119	159	130
	Untreated	35	55	57	75	115	57
Panelist 3	Experimental	43	93	96	102	130	123
	Base Lotion	37	75	67	75	83	90
	Untreated	62	98	131	96	95	126
Panelist 4	Experimental	41	104	92	124	110	90
	Base Lotion	37	96	82	82	63	78
	Untreated	31	61	62	121	56	68
Panelist 5	Experimental	71	99	168	154	181	197
	Base Lotion	59	81	134	135	149	159
	Untreated	45	90	96	99	91	81
Panelist 6	Experimental	42	85	74	120	93	94
	Base Lotion	30	83	88	78	93	94
	Untreated	58	95	113	127	124	140
Panelist 7	Experimental	57	143	170	180	212	199
	Base Lotion	51	120	162	149	201	125
	Untreated	27	55	41	59	94	57
Panelist 8	Experimental	32	96	112	120	120	96
	Base Lotion	30	77	104	101	115	78
	Untreated	29	74	100	86	126	99
Panelist 9	Experimental	47	87	107	117	122	120
	Base Lotion	45	68	92	105	110	95
	Untreated	50	74	87	90	99	91
Panelist 10	Experimental	50	119	150	161	163	181
	Base Lotion	45	108	126	150	161	166
	Untreated	47	75	112	82	97	115
Number of Panelists		10	9	10	10	10	10

Figure 1. Panelist data

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Averages	T = 0	T = 24 Hours	T = 1 Week	T = 2 Weeks	T = 3 Weeks	T = 4 Weeks
Experimental (2.0% Leucidal® Liquid Complete) in Base Lotion	51.0	103.1	121.8	136	145.4	143.5
Base Lotion Control	43.8	89.2	107.4	111.9	126.3	115.6
Untreated Control	42.6	72.6	84.6	88.8	94.8	88.4

Figure 2. Average moisturization values

Percent (%) Change	T = 0	T = 24 Hours	T = 1 Week	T = 2 Weeks	T = 3 Weeks	T = 4 Weeks
Base Lotion vs. Untreated Control	2.82	22.86	26.95	26.01	33.23	30.77
Experimental (2.0% Leucidal® Liquid Complete) vs. Untreated Control	17.61	42.01	43.97	53.15	53.37	62.33
Experimental (2.0% Leucidal® Liquid Complete) vs. Base Lotion	14.38	15.58	13.40	21.53	15.12	24.13

Figure 3. Percent change in moisturization

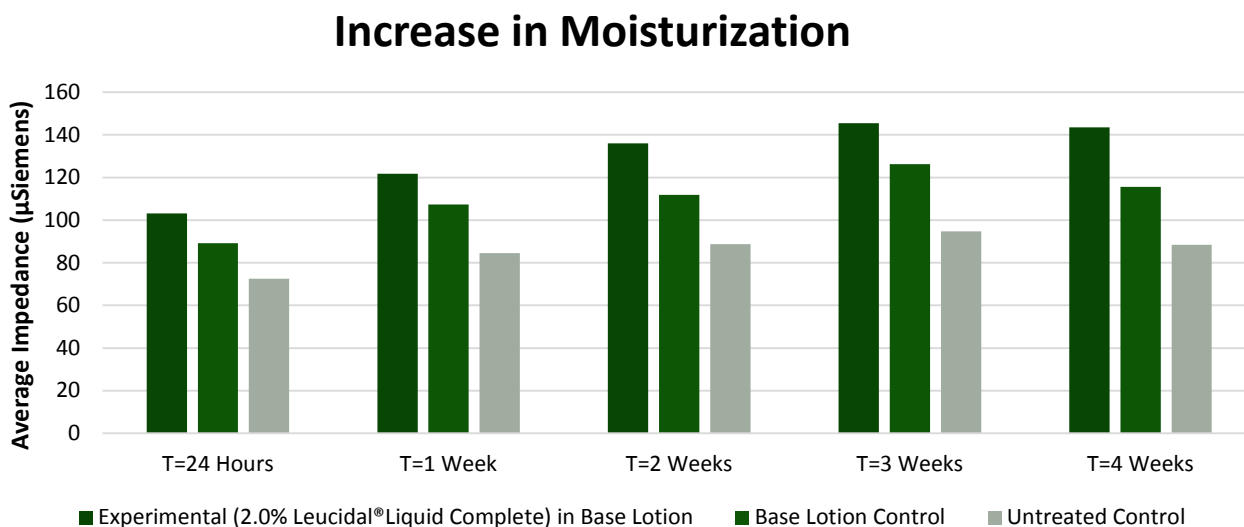


Figure 4. Average increase in moisturization

Comparative Moisturization

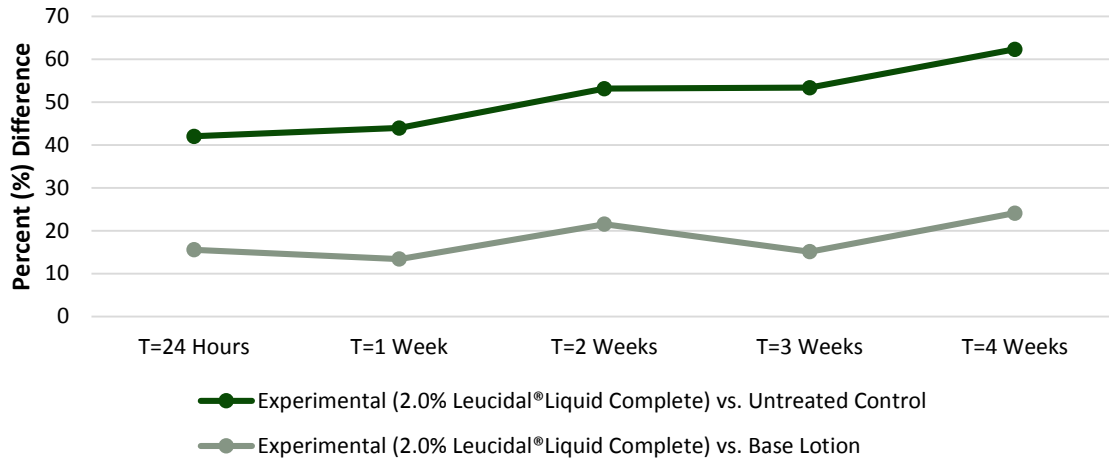


Figure 5. Percent difference in moisturization

Discussion

As evidenced in a four-week efficacy study of **Leucidal® Liquid Complete**, moisture levels were improved by 42.01% after 24 hours and by 62.33% after four weeks when compared to the untreated control. When compared to the base cream **Leucidal® Liquid Complete** improved moisturization by 14.38% and after 24 hours and by 24.13% after four weeks. Results indicate that **Leucidal® Liquid Complete** is capable of increasing moisturization when compared to both the untreated control as well as the base lotion.

The present study confirms that **Leucidal® Liquid Complete** is capable of providing strong moisturizing and skin hydrating benefits when added to cosmetic applications.



Transepidermal Water Loss (TEWL) Study

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1777

Lot #: 5013

Sponsor: Active Micro Technologies, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed: Transepidermal Water Loss Study

Introduction

An *in-vivo* study was conducted over a period of three weeks to evaluate the ability of **Leucidal® Liquid Complete** to enhance barrier function through reduction in Transepidermal Water Loss (TEWL). Results indicate that this material is capable of efficiently reducing TEWL, which allows moisture retention.

Materials

A. Equipment: DermaLab Skin Combo

Methods

Ten volunteers M/F between the ages of 23 and 45 and who were known to be free of any skin pathologies participated in this study. A Dermalab Combo was used to measure TEWL on the subject's volar forearms. The instrument consists of a probe that is based upon the vapor gradient with an open chamber. This open chamber design maintains the free natural evaporation from the skin without interfering with the environment over the measurement area. This ensures unbiased and accurate readings. Operation of the water loss module is fully menu drive, allowing for pre-setting and standard deviation or measurement time. Baseline TEWL readings were taken on day one of the study.

Following initial measurements, all subjects were asked to apply 5milligrams of each test material on their volar forearms. Measurements were taken immediately after application of the test materials and then weekly for three weeks. The test material consisted of 2.0% **Leucidal® Liquid Complete** in a base lotion.

For added perspective, measurements of an untreated test site and a site treated with a base lotion (Cetaphil Moisturizing for All Skin Types) were recorded.

Following initial measurements, all subjects were asked to apply 2.0 mg of each test material on their volar forearms. Measurements were taken immediately after application of test materials and then weekly for four weeks. The test material consisted of 2.0% **Leucidal® Liquid Complete** in a base lotion.

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Transepidermal Water Loss (TEWL) Study

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For added perspective, measurements of an untreated test site and a site treated with a base lotion (Cetaphil Moisturizing for All Skin Types) were recorded.

Results

Leucidal® Liquid Complete showed improvements in skin density at a 2.0% concentration. Please note that each value is an average of three consecutive readings per test site.

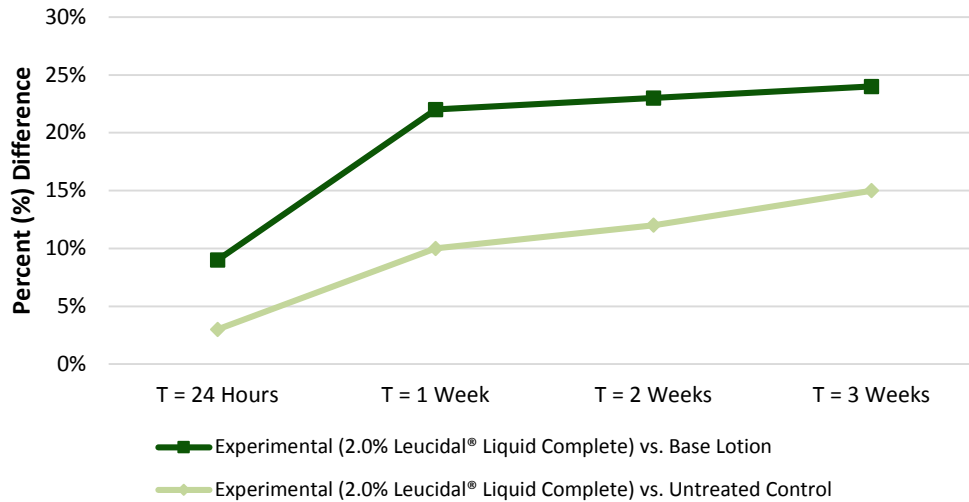
Averages	T = 24 Hours	T = 1 Week	T = 2 Weeks	T = 3 Weeks
Untreated Control	-9.06	-8.06	-7.71	-7.36
Base Lotion Control	-9.31	-9.15	-8.79	-9.12
Experimental (2.0% Leucidal® Liquid Complete) in Base Lotion	-9.99	-10.32	-9.50	-9.70

Chart 1. Average Increase in Skin Density per Individual Test Site

Percent (%) Change	T = 24 Hours	T = 1 Week	T = 2 Weeks	T = 3 Weeks
Experimental (2.0% Leucidal® Liquid Complete) vs. Base Lotion	9.0%	22.0%	23.0%	24.0%
Experimental (2.0% Leucidal® Liquid Complete) vs. Untreated Control	3.0%	10.0%	12.0%	15.0%

Chart 2. Comparison of Skin Density Changes between Two Test Sites

TEWL Comparison Over Time



Graph 1. Comparison of TEWL over time

Discussion

As shown, the results indicate continuous improvements in the barrier of the skin throughout the three week test period. After one week, the solution containing 2.0% **Leucidal® Liquid Complete** decreased TEWL 10.0% more effectively than the base lotion alone. After three weeks, the solution containing 2.0% **Leucidal® Liquid Complete** demonstrated even more effective barrier protection, decreasing TEWL 15.0% better than the base lotion alone.



High Resolution Ultrasound Skin Imaging Assay

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1777

Lot #: 5013

Sponsor: Active Concepts, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed:

High Resolution Ultrasound Skin-Imaging Assay

Introduction

An *in-vivo* study was conducted over a period of four weeks to evaluate the effect on skin density of **Leucidal® Liquid Complete**. 10 M/F subjects between the ages of 23-45 participated in the study. Results indicate that this material is capable of significantly improving skin density compared to the control.

Materials

Equipment: DermaLab Skin Combo (Ultrasound Probe)

Methods

Ultrasound skin imaging is based on measuring the acoustic response after an acoustic pulse is sent into the skin. The energy of the acoustic pulse is low and will not affect the skin in any way. When the acoustic pulse is emitted and hits different areas of the skin, part of the pulse will be reflected and part will be transmitted further into the skin. The reflected signal travels back and is picked up by the ultrasound transducer. After processing the signal, a cross-sectional image appears on the screen. This image represents an intensity, or amplitude, analysis of the signals.

The intensity of the signals that are received refer to a color scale. Dark colors represent areas of the skin with low reflection. This means that there are no changes or very small changes in density between the structures in the skin. Bright colors represent areas with strong reflections, signifying substantial changes in density between structures.

Following initial measurements, all subjects were asked to apply 2.0 mg of each test material on their volar forearms. Measurements were taken immediately after application of test materials and then weekly for four weeks. The test material consisted of 2.0% **Leucidal® Liquid Complete** in a base lotion.

This information is presented in good faith but is not warranted as to accuracy of results. Also, freedom from patent infringement is not implied.
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High Resolution Ultrasound Skin Imaging Assay

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For added perspective, measurements of an untreated test site and a site treated with a base lotion (Cetaphil Moisturizing for All Skin Types) were recorded.

Results

Leucidal® Liquid Complete showed improvements in skin density at a 2.0% concentration. Please note that each value is an average of three consecutive readings per test site.

Averages	T = 0	T = 1 Week	T = 2 Weeks	T = 3 Weeks	T = 4 Weeks
Experimental (2.0% Leucidal® Liquid Complete) in Base Lotion	62.3	70	69.2	73.1	77.6
Base Lotion Control	57.9	61.5	60.9	66.2	67.2
Untreated Control	61.6	63.4	61.2	68.4	64.1

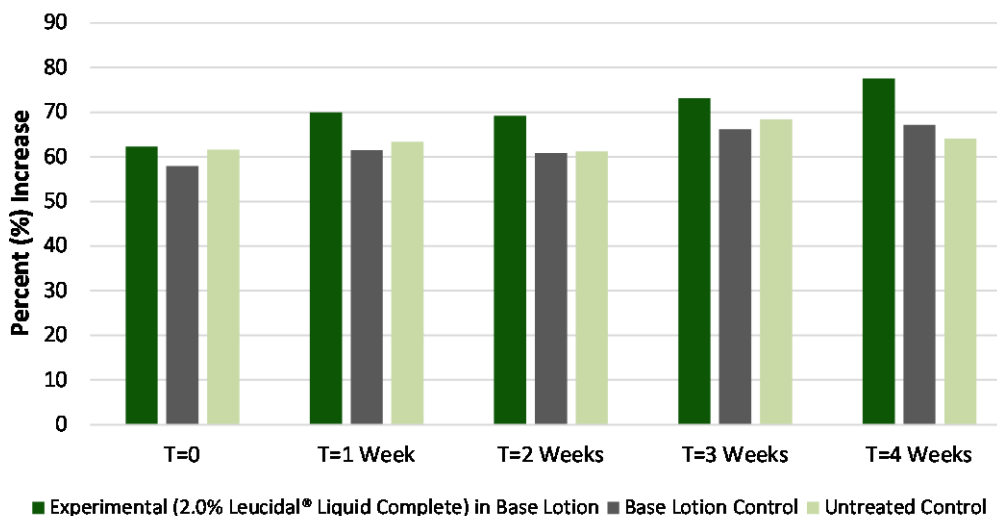
Chart 1. Average Increase in Skin Density per Individual Test Site

Percent (%) Change	T = 0	T = 1 Week	T = 2 Weeks	T = 3 Weeks	T = 4 Weeks
Experimental (2.0% Leucidal® Liquid Complete) vs. Untreated Control	9.25%	10.41%	13.07%	11.55%	17.32%
Experimental (2.0% Leucidal® Liquid Complete) vs. Base Lotion	10.51%	12.18%	13.63%	15.26%	15.87%

Chart 2. Comparison of Skin Density Changes between Two Test Sites

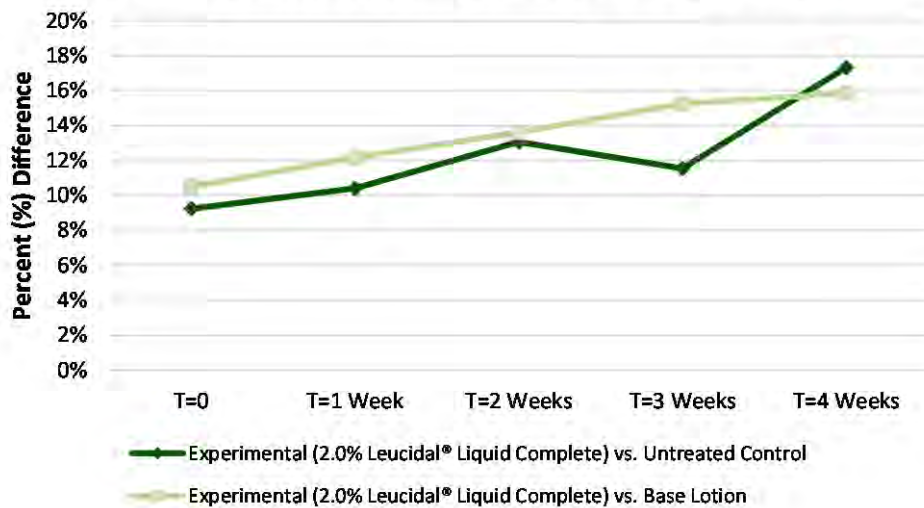
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Increase in Skin Density



Graph 1. Average Increase in Skin Density

Skin Density Comparison Over Time



Graph 2. Comparison of Skin Density

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Discussion

As evidenced in a four-week efficacy study of **Leucidal® Liquid Complete** on skin, skin density was improved by 10.41% after one week and by 17.32% after four weeks when compared to the untreated control. When compared to the base cream **Leucidal® Liquid Complete** improved skin density during each week of the trial, working 12.18% better than the base lotion after one week and 15.87% better than the base lotion after four weeks. Results indicate that **Leucidal® Liquid Complete** is capable of improving skin density when compared to both the untreated control as well as the base lotion.

Leucidal® Liquid Complete has a strong positive effect on skin's density when used at recommended use levels.

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Inhibition Activity Data

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Product Name: Leucidal® Liquid Complete
Code Number: M15024
Lot Number: NC151110-F
Test Request Number: 1682
CAS #'s: 84775-94-0 & 68333-16-4 & 8001-31-8
EINECS #'s: 283-918-6 & N/A & 232-282-8
INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract

Organism (ATCC #)	Minimum Inhibitory Concentration (%)
<i>E.coli</i> #8739	2.0
<i>S. aureus</i> #6538	2.0
<i>P. aeruginosa</i> #9027	0.5
<i>C. albicans</i> #10231	0.5
<i>A. brasiliensis</i> #16404	0.5

QA Signature _____ Monica Beltran _____

Date _____ 01-12-2016 _____

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Antimicrobial Efficacy Test

PCPC Section 20

Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1750

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



4.0% Leucidal® Liquid Complete

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Test Method

Fifty grams of Generic Cream Formula pH 3 with 4% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	99.999%	99.999%	99.999%	99.999%	99.992%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated) CFU/ml	6.3×10^6	5.1×10^6	3.3×10^6	1.5×10^5	3.1×10^5
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 3 with 4% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

* The days listed in the first column refer to the inoculum/plating day. Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.

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4.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 3 with 4% Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

Yeasts and Molds – There should be at least a 90% (1 log) reduction of yeasts and molds within 7 days following each challenge and no increase for the duration of the test period.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 7 days of each challenge. By the end of each 28-day test period Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.999% or greater.



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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

2. Phase II:

In a separate beaker, combine ingredients and heat to 75°C while mixing. Mix until homogenous. Then add to the main beaker with high-speed mixing. Maintain temperature at 75°C and mix for 30 minutes. Begin force cooling to 25°C.

3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



4.0% Leucidal® Liquid Complete

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Antimicrobial Efficacy (Challenge) Testing

The intent of performing an Antimicrobial Efficacy or Challenge test is to evaluate whether an antimicrobial agent or preservation system in a given cosmetic formulation has the ability to prevent the growth of test microorganisms. The test methodology employed by Active Micro Technologies (AMT) is based on the methods published in the CTFA Microbiology Guidelines. AMT's goal is to assist our customers by providing a screening test of a product formulation that is approaching finalization. It is expected that the formulation(s) submitted for Challenge testing contain AMT antimicrobials and have already passed the customer's internal stability tests. It is also anticipated that formal challenge testing of the final formulation will subsequently be performed by the customer at an outside lab of their choosing.

The information contained in this report is provided by Active Micro Technologies after the exercise of all reasonable care and skill in its compilation, preparation, and issue. It is provided without liability regarding its subsequent application and use. This type of screening test will be conducted only for validation of the efficacy of the antimicrobial agent or preservative system in the specific formulation tested. It does not address the suitability of the overall formula, nor does it address the regulatory status of any component therein. This testing does not account for the possibility of environmental microorganisms and cannot be relied upon as sufficient to justify commercialization of the product tested. By submitting samples for testing, the customer acknowledges that they will not hold Active Micro Technologies responsible for products launched based solely on the support of these studies.



Antimicrobial Efficacy Test PCPC Section 20 Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1751

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



4.0% Leucidal® Liquid Complete

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Test Method

Fifty grams of Generic Cream Formula pH 5 with 4% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	99.999%	99.999%	99.999%	99.999%	99.999%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated) CFU/ml	6.3×10^6	5.1×10^6	3.3×10^6	1.5×10^5	3.1×10^5
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 5 with 4% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

* The days listed in the first column refer to the inoculum/plating day. Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.

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4.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 5 with 4% Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

Yeasts and Molds – There should be at least a 90% (1 log) reduction of yeasts and molds within 7 days following each challenge and no increase for the duration of the test period.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 7 days of each challenge. By the end of each 28-day test period Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.999% or greater.



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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

2. Phase II:

In a separate beaker, combine ingredients and heat to 75°C while mixing. Mix until homogenous. Then add to the main beaker with high-speed mixing. Maintain temperature at 75°C and mix for 30 minutes. Begin force cooling to 25°C.

3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



4.0% Leucidal® Liquid Complete

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Antimicrobial Efficacy (Challenge) Testing

The intent of performing an Antimicrobial Efficacy or Challenge test is to evaluate whether an antimicrobial agent or preservation system in a given cosmetic formulation has the ability to prevent the growth of test microorganisms. The test methodology employed by Active Micro Technologies (AMT) is based on the methods published in the CTFA Microbiology Guidelines. AMT's goal is to assist our customers by providing a screening test of a product formulation that is approaching finalization. It is expected that the formulation(s) submitted for Challenge testing contain AMT antimicrobials and have already passed the customer's internal stability tests. It is also anticipated that formal challenge testing of the final formulation will subsequently be performed by the customer at an outside lab of their choosing.

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Antimicrobial Efficacy Test

PCPC Section 20

Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1752

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



4.0% Leucidal® Liquid Complete

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Test Method

Fifty grams of Generic Cream Formula pH 7 with 4% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
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Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
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Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 7 with 4% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

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4.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 7 with 4% Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

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3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



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Antimicrobial Efficacy (Challenge) Testing

The intent of performing an Antimicrobial Efficacy or Challenge test is to evaluate whether an antimicrobial agent or preservation system in a given cosmetic formulation has the ability to prevent the growth of test microorganisms. The test methodology employed by Active Micro Technologies (AMT) is based on the methods published in the CTFA Microbiology Guidelines. AMT's goal is to assist our customers by providing a screening test of a product formulation that is approaching finalization. It is expected that the formulation(s) submitted for Challenge testing contain AMT antimicrobials and have already passed the customer's internal stability tests. It is also anticipated that formal challenge testing of the final formulation will subsequently be performed by the customer at an outside lab of their choosing.

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Antimicrobial Efficacy Test PCPC Section 20 Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1747

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



2.0% Leucidal® Liquid Complete

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Test Method

Fifty grams of Generic Cream Formula pH 3 with 2% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	99.999%	99.999%	99.999%	99.999%	99.977%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated) CFU/ml	6.3×10^6	5.1×10^6	3.3×10^6	1.5×10^5	3.1×10^5
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 3 with 2% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

* The days listed in the first column refer to the inoculum/plating day. Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.

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2.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 3 with 2% Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

Yeasts and Molds – There should be at least a 90% (1 log) reduction of yeasts and molds within 7 days following each challenge and no increase for the duration of the test period.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 7 days of each challenge. By the end of each 28-day test period Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.999% or greater.



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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

2. Phase II:

In a separate beaker, combine ingredients and heat to 75°C while mixing. Mix until homogenous. Then add to the main beaker with high-speed mixing. Maintain temperature at 75°C and mix for 30 minutes. Begin force cooling to 25°C.

3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



2.0% Leucidal® Liquid Complete

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Antimicrobial Efficacy (Challenge) Testing

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Antimicrobial Efficacy Test PCPC Section 20 Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1748

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



2.0% Leucidal® Liquid Complete

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Test Method

Fifty grams of Generic Cream Formula pH 5 with 2% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	99.999%	99.999%	99.999%	99.999%	99.981%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated) CFU/ml	6.3×10^6	5.1×10^6	3.3×10^6	1.5×10^5	3.1×10^5
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 5 with 2% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

* The days listed in the first column refer to the inoculum/plating day. Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.

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2.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 5 with 2% Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

Yeasts and Molds – There should be at least a 90% (1 log) reduction of yeasts and molds within 7 days following each challenge and no increase for the duration of the test period.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 7 days of each challenge. By the end of each 28-day test period Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.999% or greater.



2.0% Leucidal® Liquid Complete

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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

2. Phase II:

In a separate beaker, combine ingredients and heat to 75°C while mixing. Mix until homogenous. Then add to the main beaker with high-speed mixing. Maintain temperature at 75°C and mix for 30 minutes. Begin force cooling to 25°C.

3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



2.0% Leucidal® Liquid Complete

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Antimicrobial Efficacy (Challenge) Testing

The intent of performing an Antimicrobial Efficacy or Challenge test is to evaluate whether an antimicrobial agent or preservation system in a given cosmetic formulation has the ability to prevent the growth of test microorganisms. The test methodology employed by Active Micro Technologies (AMT) is based on the methods published in the CTFA Microbiology Guidelines. AMT's goal is to assist our customers by providing a screening test of a product formulation that is approaching finalization. It is expected that the formulation(s) submitted for Challenge testing contain AMT antimicrobials and have already passed the customer's internal stability tests. It is also anticipated that formal challenge testing of the final formulation will subsequently be performed by the customer at an outside lab of their choosing.

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Antimicrobial Efficacy Test PCPC Section 20 Method 3

Determination of Preservation Adequacy of Water- Miscible Personal Care Products

Product

Leucidal® Liquid Complete

Test Request #:

1749

Purpose

This study was initiated to determine the efficacy of a cosmetic ingredient with antimicrobial properties in a cream formulation against bioburden as a function of time.

Study Dates

The study was started on November 10th, 2015 and was completed on January 12th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 5. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Verification of neutralization of the antimicrobial properties of the product was demonstrated prior to performing the test for microbial content by inoculating the product dilution with a low level of challenge microorganisms (100 CFU) and verifying recovery of this viable inoculum. This provides evidence that the antimicrobial has been neutralized and there are no false positive results during the Challenge Test.



2.0% Leucidal® Liquid Complete

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Test Method

Fifty grams of Generic Cream Formula pH 7 with 2% Leucidal® Liquid Complete was weighed into five individual containers. Each container was inoculated with one of the five test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 to 10^8 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition.

The inoculated samples were evaluated 0, 7, 14, 21, and 28 days after the initial inoculation to determine quantitatively the number of viable microorganisms remaining. On the 28th day of testing the samples were re-inoculated and evaluated 7, 14, 21, and 28 days after the second exposure to determine the number of viable microorganisms. The table below represents the percent reduction of viable organisms after being introduced into the test formulation.

Organisms					
Inoculum (initial) CFU/ml	<i>E. coli</i>	<i>P. aeruginosa</i>	<i>S. aureus</i>	<i>A. brasiliensis</i>	<i>C. albicans</i>
	5.2×10^6	7.3×10^6	6.5×10^6	1.8×10^5	2.2×10^5
Day 0*	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Inoculum (re-inoculated) CFU/ml	6.3×10^6	5.1×10^6	3.3×10^6	1.5×10^5	3.1×10^5
Day 7	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 14	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 21	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%
Day 28	>99.999%	>99.999%	>99.999%	>99.999%	>99.999%

Table 1. Challenge Test results for Generic Cream Formula pH 7 with 2% Leucidal® Liquid Complete inoculated on Day 0 and re-inoculated on Day 28. Results show % reduction in viable organisms.

* The days listed in the first column refer to the inoculum/plating day. Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.

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2.0% Leucidal® Liquid Complete

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Results & Discussion

The results obtained from the Neutralization Test of each product using Dey/Engley (D/E) broth, indicate that the neutralization steps conducted prior to performing the Challenge Test are indeed effective for avoiding false positive Challenge Test results.

The results of this Challenge Test demonstrate the effectiveness of the preservation system used in Generic Cream Formula pH 7 2% with Leucidal® Liquid Complete. The recommendations stated in Section 13, Determination of Preservative Adequacy in Cosmetic Formulations, in the PCPC Microbiology Guidelines are as follows:

Bacteria – There should be at least a 99.9% (3 log) reduction of vegetative bacteria within 7 days following each challenge and no increase for the duration of the test period.

Yeasts and Molds – There should be at least a 90% (1 log) reduction of yeasts and molds within 7 days following each challenge and no increase for the duration of the test period.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 7 days of each challenge. By the end of each 28-day test period Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.999% or greater.



2.0% Leucidal® Liquid Complete

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Phase	Ingredient	Supplier	%
I	Water	-	85.2
	Carbopol Ultrez 10	Lubrizol	0.1
	Glycerin	PT. Musim Mas	3.0
	Tealan	RITA	0.9
II	Cetyl Alcohol	RITA	2.0
	Stearic Acid	Acme Hardesty Oleochemicals	0.8
	Glyceryl Stearate	Protameen Chem.	1.5
	Isopropyl Myristate	Alzo	1.5
	Mineral Oil	RITA	5.0

Manufacturing Process:

1. Phase I:

Charge water into main beaker and begin propeller mixing. A vortex should form. Begin heating to 75°C. Slowly sift in Carbopol while mixing. Add the rest of ingredients.

2. Phase II:

In a separate beaker, combine ingredients and heat to 75°C while mixing. Mix until homogenous. Then add to the main beaker with high-speed mixing. Maintain temperature at 75°C and mix for 30 minutes. Begin force cooling to 25°C.

3. Check the pH.

Specifications:

Appearance: White to Off-White Emulsion

pH: 6.5 – 8.0

*If a different pH is desired, adjust using Citric Acid (50%) or NaOH (25%). Formula is stable in the 3.0 – 7.0 pH range.



2.0% Leucidal® Liquid Complete

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Antimicrobial Efficacy (Challenge) Testing

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Time Kill Test

E2315

Assessment of Antimicrobial Activity Using a Time Kill Procedure

Product

Leucidal® Liquid Complete

Test Request #:

1850

Purpose

This study was initiated to measure the change in population of aerobic microorganisms within a specified sampling time when tested against a cosmetic ingredient.

Study Dates

The study was started on March 24th, 2016 and was completed on March 28th, 2016.

Test Organisms

- | | |
|--------------------------------------|-------------|
| 1. <i>Escherichia coli</i> : | ATCC #8739 |
| 2. <i>Pseudomonas aeruginosa</i> : | ATCC #9027 |
| 3. <i>Staphylococcus aureus</i> : | ATCC #6538 |
| 4. <i>Bacillus subtilis</i> | ATCC #6051 |
| 5. <i>Aspergillus brasiliensis</i> : | ATCC #16404 |
| 6. <i>Candida albicans</i> : | ATCC #10231 |

Neutralization:

Inactivation of the antimicrobial activity of the test material is achieved through the dilution of the test material during the sampling time at specified sampling intervals.

Test Method

Ten grams of 4% Leucidal® Liquid Complete solution was weighed into six individual containers. Each container was inoculated with one of the six test organisms. The inoculum concentration for each organism was standardized using the 0.5 McFarland turbidity standard and further diluted to yield approximately 10^6 microorganisms/ml. The amount of each inoculum added to each sample was no more than 1% of the product weight, as to not alter the product composition. Serial dilutions from each container were performed to enumerate the surviving microorganisms using the Plate Count Technique.

The activity of the test material inoculated was evaluated at determine time intervals of 30 seconds, 1, 5, 10 and 30 minutes after the inoculation to determine quantitatively the number of viable microorganisms remaining after the incubation time.

Organisms	Inoculum Concentration CFU/ml	Percentage of Reduction				
		30 seconds	1 minute	5 minute	10 minute	30 minutes
<i>E.coli</i> * ATCC# 8739	1.8×10^6	99.9%	99.9%	99.9%	99.9%	99.9%
<i>S.aureus</i> ATCC# 6538	4.5×10^6	99.9%	99.9%	99.9%	99.9%	99.9%
<i>P.aeruginosa</i> ATCC# 9027	3.6×10^6	99.9%	99.9%	99.9%	99.9%	99.9%
<i>B.subtilis</i> ATCC# 6051	2.5×10^5	99.9%	99.9%	99.9%	99.9%	99.9%
<i>A.brasiliensis</i> ATCC# 16404	1.6×10^6	99.9%	99.9%	99.9%	99.9%	99.9%
<i>C.albicans</i> ATCC# 10231	3.0×10^6	99.9%	99.9%	99.9%	99.9%	99.9%

Table 1. Time Kill Test results for 4% Leucidal® Liquid Complete inoculated with 10^6 microorganisms' population. Results show % reduction in viable organisms after inoculation and sampling time intervals.

*Bacteria results are read 2 days after plating day, and mold and yeast results are read 5 days after plating day.



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(704) 276-7100 • Fax (704) 276-7101

Results & Discussion

The results of this Time Kill Test determine the changes in population of aerobic microorganisms within a specified sampling time when tested against 4% Leucidal® Liquid Complete solution.

The Gram positive and Gram negative bacteria as well as the yeast and mold were reduced by 99.9% within 30 seconds interval of the test after the inoculation.



Safety Statement

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Product Name: Leucidal[®] Liquid Complete

Product Code: M15024

INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera
(Coconut) Fruit Extract

INCI Status: Conforms

Leucidal[®] Liquid Complete is created via a twostep process of first fermenting radish root in the presence of *Leuconostoc* followed by the addition of Willow Bark Extract to initiate lysis. This process creates antimicrobial peptides that are capable of providing broad-spectrum antimicrobial activity and hydrating benefits.

Undesired plant matter and bacteria is subsequently removed via filtration. Secondly, *Cocos nucifera* (coconut) fruit is then macerated and fermented with *Lactobacillus* in a defined media under controlled conditions of pH, temperature, and time. The subsequent plant and bacteria matter is then filtered prior to blending with the aforementioned antimicrobial peptides.

Leuconostoc is a genus of microorganisms used to produce a variety of fermented food products, most commonly sauerkraut. *Leuconostoc* and *Lactobacillus* are both types of Lactic Acid Bacteria (LAB) that convert various sugars into lactic acid. Any existing LAB in Leucidal[®] Liquid Complete is removed by filtration.

The FDA (Food and Drug Administration) states in sections 201 and 409 of the Federal Food, Drug and Cosmetic Act that "any substance that is intentionally added to food is a food additive, that is subject to review and approval by FDA, unless the substance is generally recognized, among qualified experts, as having been adequately shown to be safe under conditions of its use or unless the use of the substance is otherwise excluded for the definition of a food additive."¹

Due to its status as a product of LAB and a fruit that is used in food preparations globally, the Federal Food, Drug and Cosmetic Act classifies Leucidal[®] Liquid Complete as Generally Recognized as Safe (GRAS).¹ This knowledge supports the safety of Leucidal[®] Liquid Complete.

Our internal non-animal testing policy at Active Micro Technologies, LLC does not test for NOAEL, due to the restriction placed on the animal testing of cosmetic raw materials.

In vitro dermal and ocular irritation studies were conducted to evaluate whether Leucidal[®] Liquid Complete would induce dermal or ocular irritation in the EpiDerm[™] and EpiOcular[™]

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model assays. Test substances were applied to the tissue inserts and incubated. Cell viability was measured by dehydrogenase conversion of MTT, present in cell mitochondria, into blue formazan salt that is measured after extraction from the tissue. The irritation potential of the test chemical was dictated by the reduction in tissue viability of exposed tissues compared to the negative control. Under conditions of this assay, the test article was considered to be non-irritating in both models. The substances used in these assays were undiluted. Please find attached a copy of these results.

A *Salmonella typhimurium* reverse mutation standard plate incorporation study was conducted to evaluate whether Leucidal® Liquid Complete would cause mutagenic changes in the average number of revertants for histidine-dependent *Salmonella typhimurium* strains TA98, TA100, TA1537, TA1535 and WP2uvrA in the presence and absence of S9 metabolic activation. This study was conducted to satisfy, in part, the Genotoxicity requirement of the International Organization for Standardization: Biological Evaluation of Medical Devices, Part 3: Tests for Genotoxicity, Carcinogenicity and Reproductive Toxicity. Under the conditions of this assay, the test article solution was considered to be nonmutagenic to *Salmonella typhimurium* tester strains TA98, TA100, TA1537, TA1535 and WP2uvrA. The product was tested undiluted and the negative and positive controls performed as anticipated.

Leucidal® Liquid Complete was also tested via the OECD TG 442C Direct Peptide Reactivity and OECD TG 442D In Vitro Skin Sensitization Assays in accordance with the EURL ECVAM and UN GHS guidelines. This product was determined to be a non-skin sensitizer in both in chemico and in vitro models.

The full reports for each safety study analyzing Leucidal® Liquid Complete are attached for reference.

In summary, several data sets exist to support the safety of Leucidal® Liquid Complete. The molecular weight of this product is larger than what is required to penetrate skin. Therefore, hazards that may otherwise occur via this route are not an issue. It is presented in an aqueous carrier, all but eliminating its risk for inhalation. Toxicological, irritation, and sensitization assays have all been performed with favorable results for each. This knowledge combined with the toxicity assays allows us to support the safety of Leucidal® Liquid Complete in cosmetic applications.

It is logically concluded that Leucidal® Liquid Complete is safe for use at the recommended use level of 2.0 - 4.0% and no further testing is required.



Dermal and Ocular Irritation Tests

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1684

Lot #: NC151204-F

Sponsor: Active Concepts, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Erica Segura

Principle Investigator: Maureen Danaher

Test Performed:

In Vitro EpiDerm™ Dermal Irritation Test (EPI-200-SIT)

EpiOcular™ Eye Irritation Test (OCL-200-EIT)

SUMMARY

In vitro dermal and ocular irritation studies were conducted to evaluate whether **Leucidal® Liquid Complete** would induce dermal or ocular irritation in the EpiDerm™ and EpiOcular™ model assays.

The product was tested according to the manufacture's protocol. The test article solution was found to be a **non-irritant**. Reconstructed human epidermis and cornea epithelial model were incubated in growth media overnight to allow for tissue equilibration after shipping from MatTek Corporation, Ashland, MA. Test substances were applied to the tissue inserts and incubated for 60 minutes for liquid and solid substances in the EpiDerm™ assay and 30 minutes for liquid substances and 90 minutes for solid substances in the EpiOcular™ assay at 37°C, 5% CO₂, and 95% relative humidity (RH). Tissue inserts were thoroughly washed and transferred to fresh plates with growth media. After post substance dosing incubation is complete, the cell viability test begins. Cell viability is measured by dehydrogenase conversion of MTT [(3-4,5-dimethyl thiazole 2-yl)], present in the cell mitochondria, into blue formazan salt that is measured after extraction from the tissue. The irritation potential of the test chemical is dictated by the reduction in tissue viability of exposed tissues compared to the negative control.

Under the conditions of this assay, the test article was considered to be **non-irritating**. The negative and positive controls performed as anticipated.

I. Introduction

A. Purpose

In vitro dermal and ocular irritation studies were conducted to evaluate whether a test article would induce dermal or ocular irritation in the EpiDerm™ and EpiOcular™ model assays. MatTek Corporation's reconstructed human epidermal and human ocular models are becoming a standard in determining the irritancy potential of test substances. They are able to discriminate between irritants and non-irritants. The EpiDerm™ assay has accuracy for the prediction of UN GHS R38 skin irritating and no-label (non-skin irritating) test substances. The EpiOcular™ assay can differentiate chemicals that have been classified as R36 or R41 from the EU classifications based on Dangerous Substances Directive (DSD) or between the UN GHS Cat 1 and Cat 2 classifications.

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II. Materials

- A. Incubation Conditions:** 37°C at 5% CO₂ and 95% relative humidity
- B. Equipment:** Forma humidified incubator, ESCO biosafety laminar flow hood, Synergy HT Microplate reader; Pipettes
- C. Media/Buffers:** DMEM based medium; DPBS; sterile deionized H₂O
- D. Preparation:** Pre-incubate (37°C) tissue inserts in assay medium; Place assay medium and MTT diluent at 4°C, MTT concentrate at -20°C, and record lot numbers of kit components
- E. Tissue Culture Plates:** Falcon flat bottom 96-well, 24-well, 12-well, and 6-well tissue culture plates
- F. Reagents:** MTT (1.0mg/mL); Extraction Solution (Isopropanol); SDS (5%); Methyl Acetate
- G. Other:** Nylon Mesh Circles (EPI-MESH); Cotton tip swabs; 1mL tuberculin syringes; Ted Pella micro-spatula; 220mL specimen containers; sterile disposable pipette tips; Parafilm

III. Test Assay

A. Test System

The reconstructed human epidermal model, EpiDerm™, and cornea epithelial model, EpiOcular™, consist of normal human-derived epidermal keratinocytes which have been cultured to form a multilayer, highly differentiated model of the human epidermis and cornea epithelium. These models consist of organized basal, spinous, and granular layers, and the EpiDerm™ systems also contains a multilayer stratum corneum containing intercellular lamellar lipid layers that the EpiOcular™ system is lacking. Both the EpiDerm™ and EpiOcular™ tissues are cultured on specially prepared cell culture inserts.

B. Negative Control

Sterile DPBS and sterile deionized water are used as negative controls for the EpiDerm™ and EpiOcular™ assays, respectfully.

C. Positive Control

Known dermal and eye irritants, 5% SDS solution and Methyl Acetate, were used as positive controls for the EpiDerm™ and EpiOcular™ assays, respectfully.

D. Data Interpretation Procedure

a. EpiDerm™

An irritant is predicted if the mean relative tissue viability of the 3 tissues exposed to the test substance is reduced by 50% of the mean viability of the negative controls and a non-irritant's viability is > 50%.

b. EpiOcular™

An irritant is predicted if the mean relative tissue viability of the 2 tissues exposed to the test substance is reduced by 60% of the mean viability of the negative controls and a non-irritant's viability is > 40%.

IV. Method

A. Tissue Conditioning

Upon MatTek kit arrival at Active Micro Technologies, LLC the tissue inserts are removed from their shipping medium and transferred into fresh media and tissue culture plates and incubated at 37°C at 5% CO₂ and 95% relative humidity for 60 minutes. After those 60 minutes the inserts are transferred into fresh media and tissue culture plates and incubated at 37°C at 5% CO₂ and 95% relative humidity for an additional 18 to 21 hours.

B. Test Substance Exposure

a. EpiDerm™

30µL (liquid) or 25mg (solid) of the undiluted test substance is applied to 3 tissue inserts and allowed to incubate for 60 minutes in a humidified incubator (37°C, 5% CO₂, 95% RH).

b. EpiOcular™

Each tissue is dosed with 20µL DPBS prior to test substance dosing. 50µL (liquid) or 50mg (solid) of the undiluted test substance is applied to 2 tissue inserts and allowed to incubate for 90 minutes in a humidified incubator (37°C, 5% CO₂, 95% RH).

C. Tissue Washing and Post Incubation

a. EpiDerm™

All tissue inserts are washed with DPBS, dried with cotton tipped swab, and transferred to fresh media and culture plates. After 24 hours the inserts are again transferred into fresh media and culture plates for an additional 18 to 20 hours.

b. EpiOcular™

Tissue inserts are washed with DPBS and immediately transferred into 5mL of assay medium for 12 to 14 minutes. After this soak the inserts are transferred into fresh media and tissue culture plates for 120 minutes for liquid substances and 18 hours for solid substances.

D. MTT Assay

Tissue inserts are transferred into 300µL MTT media in pre-filled plates and incubated for 3 hours at 37°C, 5% CO₂, and 95% RH. Inserts are then removed from the MTT medium and placed in 2mL of the extraction solution. The plate is sealed and incubated at room temperature in the dark for 24 hours. After extraction is complete the tissue inserts are pierced with forceps and 2 x 200µL aliquots of the blue formazan solution is transferred into a 96 well plate for Optical Density reading. The spectrophotometer reads the 96-well plate using a wavelength of 570 nm.

V. Acceptance Criterion

A. Negative Control

The results of this assay are acceptable if the mean negative control Optical Density (OD₅₇₀) is ≥ 1.0 and ≤ 2.5 (EpiDerm™) or ≥ 1.0 and ≤ 2.3 (EpiOcular™).

B. Positive Control

a. EpiDerm™

The assay meets the acceptance criterion if the mean viability of positive control tissues expressed as a % of the negative control is $\leq 20\%$.

b. EpiOcular™

The assay meets the acceptance criterion if the mean viability of positive control tissues is $< 60\%$ of control viability.

C. Standard Deviation

Since each irritancy potential is predicted from the mean viability of 3 tissues for EpiDerm™ and 2 tissues for EpiOcular™, the variability of the replicates should be $< 18\%$ for EpiDerm™ and $< 20\%$ EpiOcular™.

VI. Results

A. Tissue Characteristics

The tissue inserts included in the MatTek EpiDerm™ and EpiOcular™ assay kits were in good condition, intact, and viable.

B. Tissue Viability Assay

The results are summarized in Figures 1 and 2. In no case was the tissue viability $\leq 50\%$ for EpiDerm™ or $\leq 60\%$ for EpiOcular™ in the presence of the test substance. The negative control mean exhibited acceptable relative tissue viability while the positive control exhibited substantial loss of tissue viability and cell death.

C. Test Validity

The data obtained from this study met criteria for a valid assay.

VII. Conclusion

Under the conditions of this assay, the test article substance was considered to be **non-irritating**. The negative and positive controls performed as anticipated.

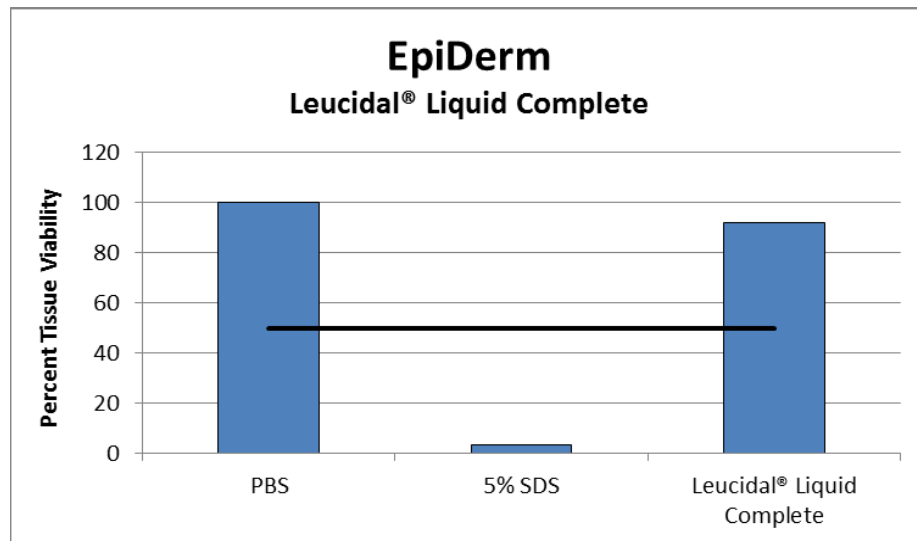


Figure 1: EpiDerm tissue viability

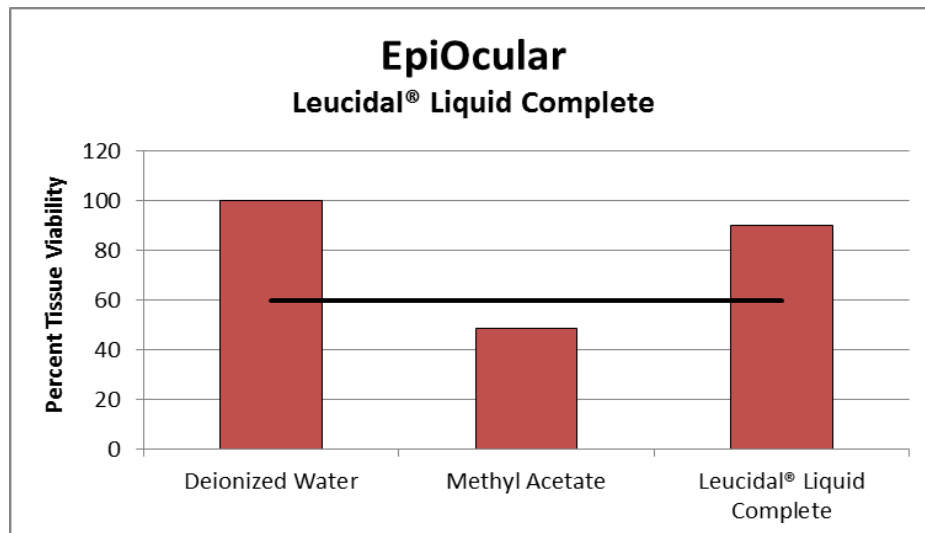


Figure 2: EpiOcular tissue viability

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OECD TG 442C: *In Chemico* Skin Sensitization

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal[®] Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1698

Lot #: NC151204-F

Sponsor: Active Micro Technologies, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Erica Segura

Principle Investigator: Maureen Danaher

Test Performed:

OECD TG 442C: *In Chemico* Skin Sensitization
Direct Peptide Reactivity Assay (DPRA)

Introduction

A skin sensitizer is a substance that will lead to an allergic response following skin contact¹. Haptenation is the covalent binding of a hapten, or low-molecular weight substance or chemical, to proteins in the skin. This is considered the prominent mechanism which defines a chemical as a sensitizer. Haptenation is described as a "molecular initiating event" in the OECD Adverse Outcome Pathway (AOP) for skin sensitization which summarizes the key events known to be involved in chemically-induced allergic contact dermatitis². The direct peptide reactivity assay (DPRA) is designed to mimic the covalent binding of electrophilic chemicals to nucleophilic centers in skin proteins by quantifying the reactivity of chemicals towards the model synthetic peptides containing cysteine and lysine. The DPRA is able to distinguish sensitizers from non-sensitizer with 82% accuracy (sensitivity of 76%; specificity of 92%)³.

This assay was conducted to determine skin sensitization hazard of **Leucidal[®] Liquid Complete** in accordance with European Union Reference Laboratory for Alternatives to Animal Testing (EURL ECVAM) and OECD Test Guideline 442C.

Assay Principle

The DPRA is an *in chemico* method which addresses peptide reactivity by measuring depletion of synthetic heptapeptides containing either cysteine or lysine following 24 hours incubation with the test substance. The peptide is a custom material containing phenylalanine to aid in detection. Depletion of the peptide in the reaction mixture is measured by HPLC with gradient elution and UV detection at 220 nm. Cysteine and lysine peptide percent depletion values are then calculated and used in a prediction model which allows assigning the test chemical to one of four reactivity classes used to support the discrimination between sensitizers and non-sensitizers.

1. United Nations Economic Commission (UNECE) (2013) Global Harmonized System of Classification and Labelling of Chemicals (GHS) 5th Revised Edition

2. OECD (2012). The Adverse Outcome Pathway for Skin Sensitization Initiated by Covalent Binding to Proteins. Part 1: Scientific Evidence. Series on Testing and Assessment No. 168

3. EC EURL ECVAM (2012) Direct peptide reactivity assay (DPRA) validation study report; pp 1 -74.

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Materials

- | | |
|-------------------------------|---|
| A. Equipment: | HPLC-UV (Waters Breeze - Waters 2998 Photodiode Array Detector);
Pipettes; Analytical balance |
| B. HPLC/Guard Columns: | Agilent Zorbax SB-C18 2.1mm x 100mm x 3.5µm; Phenomenex
Security Guard C18 4mm x 2mm |
| C. Chemicals: | Trifluoroacetic acid; Ammonium acetate; Ammonium hydroxide;
Acetonitrile; Cysteine peptide (Ac-RFAACAA-COOH); Lysine peptide
(Ac-RFAAKAA-COOH); Cinnamic aldehyde |
| D. Reagents/Buffers: | Sodium phosphate buffer (100mM); Ammonium acetate buffer
(100mM) |
| E. Other: | Sterile disposable pipette tips |

Methods

Solution Preparation:

- 0.667mM Cysteine Peptide in 100mM Phosphate Buffer (pH 7.5)
- 0.667mM Lysine Peptide in 100mM Ammonium Acetate Buffer (pH 10.2)
- 100mM Cinnamic Aldehyde in Acetonitrile
- 100mM **Leucidal® Liquid Complete** in Acetonitrile

Reference Controls:

- Reference Control A: For calibration curve accuracy
- Reference Control B: For peptide stability over analysis time of experiment
- Reference Control C: For verification that the solvent does not impact percent peptide depletion

Sample, Reference Control, and Co-Elution Control Preparation:

- Once these solutions have been made they should be incubated at room temperature, protected from light, for 24±2 hours before running HPLC analysis.
- Each chemical should be analyzed in triplicate.

1:10 Ratio, Cysteine Peptide 0.5mM Peptide, 5mM Test Chemical	1:50 Ratio, Lysine Peptide 0.5mM Peptide, 25mM Test Chemical
<ul style="list-style-type: none"> • 750µL Cysteine Peptide Solution (or 100mM Phosphate Buffer, pH 7.5, for Co-Elution Controls) • 200µL Acetonitrile • 50µL Test Chemical Solution (or Acetonitrile for Reference Controls) 	<ul style="list-style-type: none"> • 750µL Lysine Peptide Solution (or 100mM Ammonium Acetate Buffer, pH 10.2, for Co-Elution Controls) • 250µL Test Chemical Solution (or Acetonitrile for Reference Controls)



OECD TG 442C: In Chemico Skin Sensitization

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Calibration Curve:

- Standards are prepared in a solution of 20% Acetonitrile:Buffer
 - For the Cysteine peptide using the phosphate buffer, pH 7.5
 - For the Lysine peptide using the ammonium acetate buffer, pH 10.2

	Standard 1	Standard 2	Standard 3	Standard 4	Standard 5	Standard 6	Standard 7
mM Peptide	0.534	0.267	0.1335	0.0667	0.0334	0.0167	0.000

HPLC Analysis:

- HPLC-UV system should be equilibrated at 30°C with 50% Mobile Phase A (0.1% (v/v) trifluoroacetic acid in water) and 50% Mobile Phase B (0.085% (v/v) trifluoroacetic acid in acetonitrile) for 2 hours
- Absorbance is measured at 220nm
- Flow Conditions:

Time	Flow	%A	%B
0 minutes	0.35 mL/min	90	10
10 minutes	0.35 mL/min	75	25
11 minutes	0.35 mL/min	10	90
13 minutes	0.35 mL/min	10	90
13.5 minutes	0.35 mL/min	90	10
20 minutes	End Run		

Data and Reporting

Acceptance Criteria:

- The following criteria must be met for a run to be considered valid:
 - Standard calibration curve should have an $r^2 > 0.99$.
 - Mean percent peptide depletion values of three replicates for the positive control cinnamic aldehyde should be between 60.8% and 100% for the cysteine peptide and between 40.2% and 69% for the lysine peptide and the maximum standard deviation should be <14.9 for the percent cysteine depletion and <11.6 for the percent lysine depletion.
 - Mean peptide concentration of reference controls A should be 0.50 ± 0.05 mM and the coefficient of variable of the peptide peak areas for reference B and C in acetonitrile should be <15.0%.
- The following criteria must be met for a test chemical's results to be considered valid:
 - Maximum standard deviation should be <14.9 for percent cysteine depletion and <11.6 for percent lysine depletion.
 - Mean peptide concentration of the three reference control C should be 0.50 ± 0.05 mM.

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OECD TG 442C: In Chemico Skin Sensitization

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Prediction Model:

Cysteine 1:10/Lysine 1:50 Prediction Model		
Mean of Cysteine and Lysine % Depletion	Reactivity Class	Prediction
0% < Mean % Depletion < 6.38%	Minimal Reactivity	Non-sensitizer
6.38% < Mean % Depletion < 22.62%	Low Reactivity	Sensitizer
22.62% < Mean % Depletion < 42.47%	Moderate Reactivity	Sensitizer
42.47% < Mean % Depletion < 100%	High Reactivity	Sensitizer

If co-elution occurs with the lysine peptide, then the cysteine 1:10 prediction model can be used:

Cysteine 1:10 Prediction Model		
Mean of Cysteine and Lysine % Depletion	Reactivity Class	Prediction
0% < Cys % Depletion < 13.89%	Minimal Reactivity	Non-sensitizer
13.89% < Cys % Depletion < 23.09%	Low Reactivity	Sensitizer
23.09% < Cys % Depletion < 98.24%	Moderate Reactivity	Sensitizer
98.24% < Cys % Depletion < 100%	High Reactivity	Sensitizer

Results and Discussion

The data obtained from this study met criteria for a valid assay and the controls performed as anticipated.

Percent peptide depletion is determined by the following equation:

$$\text{Percent Peptide Depletion} = \left[1 - \left(\frac{\text{Peptide Peak Area in Replicate Injection}}{\text{Mean Peptide Peak Area in Reference Controls C}} \right) \right] \times 100$$

Based on HPLC-UV analysis of **Leucidal® Liquid Complete (code M15024)** we can determine that this product is not a sensitizer and will not cause allergic contact dermatitis. The Mean Percent Depletion of Cysteine and Lysine was 2.74% causing minimal reactivity in the assay giving us the prediction of a non-sensitizer.



OECD TG 442D: In Vitro Skin Sensitization

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1700

Lot #: NC151204-F

Sponsor: Active Concepts, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Erica Segura

Principle Investigator: Maureen Danaher

Test Performed:

OECD TG 442D: In Vitro Skin Sensitization

ARE-Nrf2 Luciferase Test Method

Introduction

Skin sensitization refers to an allergic response following skin contact with the tested chemical, as defined by the United Nations Globally Harmonized System of Classification and Labelling of Chemicals¹. Substances are classified as skin sensitizers if there is evidence in humans that the substance can lead to sensitization by skin contact or positive results from appropriate tests, both *in vivo* and *in vitro*. Utilization of the KeratinoSens™ cell line allows for valid *in vitro* testing for skin sensitization.

This assay was conducted to determine skin sensitization potential of **Leucidal® Liquid Complete** in accordance with the UN GHS.

Assay Principle

The ARE-Nrf2 luciferase test method addresses the induction of genes that are regulated by antioxidant response elements (ARE) by skin sensitizers. The Keap1-Nrf2-ARE pathways have been shown to be major regulator of cytoprotective responses to oxidative stress or electrophilic compounds. These pathways are also known to be involved in the cellular processes in skin sensitization. Small electrophilic substances such as skin sensitizers can act on the sensor protein Keap1 (Kelch-like ECH-associated protein 1), by covalent modification of its cysteine residue, resulting in its dissociation from the transcription factor Nrf2 (nuclear factor-erythroid 2-related factor 2). The dissociated Nrf2 can then activate ARE-dependent genes such as those coding for phase II detoxifying enzymes.

The skin sensitization assay utilizes the KeratinoSens™ method which uses an immortalized adherent human keratinocyte cell line (HaCaT cell line) that has been transfected with a selectable plasmid to quantify luciferase gene induction as a measure of activation of Keap1-Nrf2-antioxidant/electrophile response element (ARE). This test method has been validated by independent peer review by the EURL-ECVAM. The addition of a luciferin containing reagent to the cells will react with the luciferase produced in the cell resulting in luminescence which can be quantified with a luminometer.

1. United Nations (UN) (2013). Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Fifth revised edition, UN New York and Geneva, 2013

Materials

- | | |
|----------------------------------|--|
| A. Incubation Conditions: | 37°C at 5% CO ₂ and 95% relative humidity (RH) |
| B. Equipment: | Humidified incubator; Biosafety laminar flow hood; Microplate Reader; Pipettes |
| C. Cell Line: | KeratinoSens™ by Givaudan Schweiz AG |
| D. Media/Buffers: | Dulbecco's Modified Eagle Medium (DMEM); Fetal Bovine Serum (FBS); Phosphate Buffered Saline (PBS); Geneticin |
| E. Culture Plate: | Flat bottom 96-well tissue culture treated plates |
| F. Reagents: | Dimethyl Sulfoxide (DMSO); Cinnamic Aldehyde; ONE-Glo Reagent; 3-(4,5-dimethylthiazol-2-yl)-2,5-diphenyltetrazolium bromide (MTT); sodium lauryl sulfate (SLS) |
| G. Other: | Sterile disposable pipette tips; wash bottles |

Methods

KeratinoSens™ were into seeded four 96-well tissue culture plates and allowed to grow to 80 – 90% confluency in DMEM containing 10% FBS and 500µg/mL G418 geneticin. Twelve test concentrations of **Leucidal® Liquid Complete** were prepared in DMSO with a concentration range from 0.98 – 2000 µM. These 12 concentrations were assayed in triplicate in 2 independently performed experiments. The positive control was cinnamic aldehyde for which a series of 5 concentrations prepared in DMSO had final test concentrations of 4 – 64 µM. The negative control was a 1% test concentration of DMSO.

24 hour post KeratinoSens™ seeding, the culture media was removed and replaced with fresh media containing 10% FBS without G418 geneticin. 50 µL of the above described test concentrations was added to the appropriate wells. The treated plates were then incubated for 48 hours at 37°C in the presence of 5% CO₂ and 95% relative humidity. After treatment incubation was complete the media was removed and the wells were washed with PBS 3 times.

One of the four plates was used for a cytotoxicity endpoint, where MTT was added to the wells and incubated for 4 hours at 37°C in the presence of 5% CO₂. SLS was then added to the wells and incubated overnight at room temperature. A spectrometer measured the absorbance at 570 nm. The absorbance values (optical density) were then used to determine the viability of each well by comparing the optical density of each test material treated well to that of the solvent control wells to determine the IC₅₀ and IC₃₀ values.

The remaining 3 plates were used in the luciferase induction endpoint of the assay. 100 µL of Promega's ONE-Glo Reagent was added to 100 µL of fresh media containing 10% FBS without geneticin. Cells were incubated for 5 minutes to induce cell lysis and release luciferin into the media. Plates were read with a luminometer and EC_{1.5} and maximum response (I_{max}) values were obtained.

Data and Reporting

Acceptance Criteria:

- Gene induction obtained with the positive control, cinnamic aldehyde, should be statistically significant above the threshold of 1.5 in at least one of the tested concentrations (from 4 to 64 µM).
- The EC_{1.5} value should be within two standard deviations of the historical mean and the average induction in the three replicates for cinnamic aldehyde at 64 µM should be between 2 and 8.
- The average coefficient of variability of the luminescence reading for the negative (solvent) control DMSO should be below 20% in each experiment.

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A KeratinoSens™ prediction is considered positive if the following conditions are met:

1. The I_{max} is higher than 1.5-fold and statistically significantly higher as compared to the solvent (negative) control
2. The cellular viability is higher than 70% at the lowest concentration with a gene induction above 1.5 fold (i.e., at the EC_{1.5} determining concentration)
3. The EC_{1.5} value is less than 1000 µM (or < 200 µg/ml for test chemicals with no defined MW)
4. There is an apparent overall dose-response for luciferase induction

Results

Compound	Classification	EC _{1.5} (µM)	IC ₅₀ (µM)	I _{max}
Cinnamic aldehyde	Sensitizer	19	289.19	31.6
DMSO	Non-Sensitizer	No Induction	243.24	1.2
Leucidal® Liquid Complete	Non-Sensitizer	No Induction	> 1000	0.5

Table 1: Overview of KeratinoSens™ Assay Results

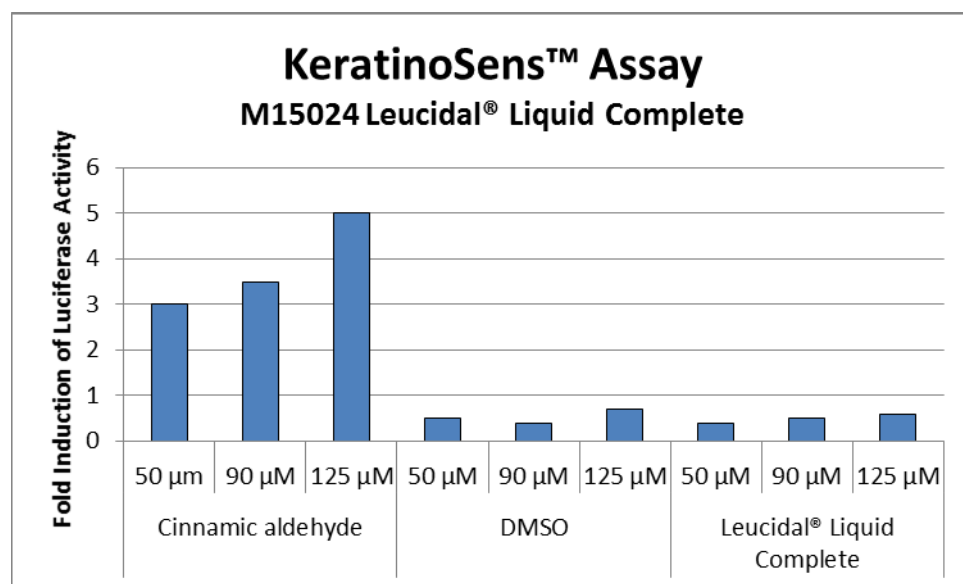


Figure 1: Fold Induction of Luciferase

Discussion

As shown in the results, **Leucidal® Liquid Complete (code M15024)** was not predicted to be a skin sensitizer based on the KeratinoSens™ ARE-Nrf2 Luciferase Test Method as there was not a significant increase in luciferase expression. It can be concluded that **Leucidal® Liquid Complete** can be safely used in cosmetics and personal care products at typical use levels.

Test Article: Leucidal® Liquid Complete
Code Number: M15024
CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Sponsor:
Active Micro Technologies, LLC
107 Technology Drive
Lincolnton, NC 28092

Study Director: Erica Segura
Principle Investigator: Monica Beltran

Test Performed:
Genotoxicity: Bacterial Reverse Mutation Test

Reference:
OECD471/ISO10993.Part 3

Test Request Number: 1691

SUMMARY

A *Salmonella typhimurium*/*Escherichia coli* reverse mutation standard plate incorporation study described by Ames *et al.* (1975) was conducted to evaluate whether a test article solution **Leucidal® Liquid Complete** would cause mutagenic changes in the average number of revertants for histidine-dependent *Salmonella typhimurium* strains TA98, TA100, TA1537, TA1535 and tryptophan-dependent *Escherichia coli* strain WP2uvrA in the presence and absence of Aroclor-induced rat liver S9. This study was conducted to satisfy, in part, the Genotoxicity requirement of the International Organization for Standardization: Biological Evaluation of Medical Devices, Part 3: Tests for Genotoxicity, Carcinogenicity and Reproductive Toxicity.

The stock test article was tested at eight doses levels along with appropriate vehicle control and positive controls with overnight cultures of tester strains. The test article solution was found to be noninhibitory to growth of tester strain TA98, TA100, TA1537, TA1535 and WP2uvrA after Spot Inhibition Screen.

Separate tubes containing 2 ml of molten top agar at 45°C supplemented with histidine-biotin solution for the *Salmonella typhimurium* strains and supplemented with tryptophan for *Escherichia coli* strain were inoculated with 100 µl of tester strains, 100 µl of vehicle or test article dilution were added and 500 µl aliquot of S9 homogenate, simulating metabolic activation, was added when necessary. After vortexing, the mixture was poured across the Minimal Glucose Agar (GMA) plates. Parallel testing was also conducted with positive control correspond to each strain, replacing the test article aliquot with 50µl aliquot of appropriate positive control. After the overlay had solidified, the plates were inverted and incubated for 48 hours at 37°C. The mean numbers of revertants of the test plates were compared to the mean number of revertants of the negative control plates for each of the strains tested. The means obtained for the positive controls were used as points of reference.

Under the conditions of this assay, the test article solution was considered to be Non-Mutagenic to *Salmonella typhimurium* tester strains TA98, TA100, TA1537, TA1535 and *Escherichia coli* tester strain WP2uvrA. The negative and positive controls performed as anticipated. The results of this study should be evaluated in conjunction with other required tests as listed in ISO 100993, Part 3: Tests for Genotoxicity, Carcinogenicity, and Reproductive Toxicology.

I. Introduction

A. Purpose

A *Salmonella typhimurium*/*Escherichia coli* reverse mutation standard plate incorporation study was conducted to evaluate whether a test article solution would cause mutagenic changes in the average number of revertants for *Salmonella typhimurium* tester strains TA98, TA100, TA1537, TA1535 and *Escherichia coli* WP2uvrA in the presence and absences of the S9 metabolic activation. Bacterial reverse mutation tests have been widely used as rapid screening procedures for the determination of mutagenic and potential carcinogenic hazards.

II. Materials

- A. **Storage Conditions:** Room temperature (23-25C).
- B. **Vehicle:** Sterile DI Water.
- C. **Preparation:** Eight different doses level were prepared immediately before use with sterile DI water.
- D. **Solubility/Stability:** 100% Soluble and Stable.
- E. **Toxicity:** No significant inhibition was observed.

III. Test System

A. Test System

Each *Salmonella typhimurium* and *Escherichia coli* tester strain contains a specific deep rough mutation (*rfa*), the deletion of *uvrB* gene and the deletion in the *uvrA* gene that increase their ability to detect mutagens, respectively. These genetically altered *Salmonella typhimurium* strains (TA98, TA100, TA1537 and TA1535) and *Escherichia coli* strain (WP2*uvrA*) cannot grow in the absence of histidine and tryptophan, respectively. When placed in a histidine-tryptophan free medium, only those cells which mutate spontaneously back to their wild type states are able to form colonies. The spontaneous mutation rate (or reversion rate) for any one strain is relatively constant, but if a mutagen is added to the test system, the mutation rate is significantly increased.

<u>Tester strain</u>	<u>Mutations/Genotypic Relevance</u>
TA98	hisD3052, Dgal chlD bio <i>uvrB rfa</i> pKM101
TA100	hisG46, Dgal chlD BIO <i>uvrB rfa</i> pKM101
TA1537	hisC3076, <i>rfa</i> , Dgal chlD bio <i>uvrB</i>
TA 1535	hisG46, Dgal chlD bio <i>uvrB rfa</i>
WP2 <i>uvrA</i>	trpE, <i>uvrA</i>

<i>rfa</i>	=	causes partial loss of the lip polysaccharide wall which increases permeability of the cell to large molecules.
<i>uvrB</i>	=	deficient DNA excision-repair system (i.e., ultraviolet sensitivity)
pKM101	=	plasmid confers ampicillin resistance (R-factor) and enhances sensitivity to mutagens.
<i>uvrA</i>	=	All possible transitions and transversions, small deletions.

B. Metabolic Activation

Aroclor induced rat liver (S9) homogenate was used as metabolic activation. The S9 homogenate is prepared from male Sprague Dawley rats. Material is supplied by MOLTOX, Molecular Toxicology, Inc.

C. Preparation of Tester strains

Cultures of *Salmonella typhimurium* TA98, TA100, TA1537, TA1535 and *Escherichia coli* WP2*uvrA* were inoculated to individual flasks containing Oxoid broth No.2. The inoculated broth cultures were incubated at 37°C in an incubator shaker operating at 140-150 rpm for 12-16 hours.

D. Negative Control

Sterile DI water (vehicle without test material) was tested with each tester strain to determine the spontaneous reversion rate. Each strain was tested with and without S9 activation. These data represented a base rate to which the number of revertant colonies that developed in each test plate were compared to determine whether the test material had significant mutagenic properties.

E. Positive Control

A known mutagen for each strain was used as a positive control to demonstrate that tester strains were sensitive to mutation to the wild type state. The positive controls are tested with and without the presence of S9 homogenate.

F. Titer of the Strain Cultures:

Fresh cultures of bacteria were grown up to the late exponential or early stationary phase of growth; to confirm this, serial dilutions from each strain were conducted, indicating that the initial population was in the range of 1 to 2×10^9 /ml.

IV. Method**A. Standard Plate Incorporation Assay:**

Separate tubes containing 2 ml of molten top agar supplemented with histidine-biotin solution for the *Salmonella typhimurium* and tryptophan for *Escherichia coli* were inoculated with 100 μ l of culture for each strain and 100 μ l of testing solution or vehicle without test material. A 500 μ l aliquot of S9 homogenate, simulating metabolic activation, was added when necessary. The mixture was poured across Minimal Glucose Agar plates labeled with strain number and S9 activation (+/-). When plating the positive controls, the test article aliquot was replaced by 50 μ l aliquot of appropriate positive control. The test was conducted per duplicate. The plates were incubated for 37°C for 2 days. Following the incubation period, the revertant colonies on each plate were recorded. The mean number of revertants was determined. The mean numbers of revertants of the test plates were compared to the mean number of revertants of the negative control of each strain used.

V. Evaluation

For the test solution to be evaluated as a test failure or "potential mutagen" there must have been a 2-fold or greater increase in the number of mean revertants over the means obtained from the negative control for any or all strains. Each positive control mean must have exhibited at least a 3-fold increase over the respective negative control mean of the *Salmonella* and *Escherichia coli* tester strain used.

VI. Results and Discussion**A. Solubility:**

Water was used as a solvent. Solutions from the test article were made from 0.015 to 50mg/ml.

B. Dose levels tested:

The maximum dose tested was 5000 μ g per plate. The dose levels tested were 1.5, 5.0, 15, 50, 150, 500, 1500 and 5000 μ g per plate.

C. Titer (Organisms/ml):

5×10^8 UFC/ml plate count indicates that the initial population was in the range of 1 to 2×10^9 UFC/ml.

C. Standard Plate Incorporation Assay

In no case was there a 2-fold or greater increase in the mean number of revertant testing strains TA98, TA100, TA1537, TA1535 and WP2uvrA in the presence of the test solution compared with the mean of vehicle control value. The positive controls mean exhibited at least a 3-fold increase over the respective mean of the *Salmonella typhimurium* and *Escherichia coli* tester strains used. The results are summarized in Appendix 2.

VII. Conclusion

All criteria for a valid study were met as described in the protocol. The results of the Bacterial Reverse Mutation Assay indicate that under the conditions of this assay, the test article solution was considered to be Non-Mutagenic to *Salmonella typhimurium* tester strains TA98, TA100, TA1537, TA1535 and *Escherichia coli* WP2uvrA. The negative and positive controls performed as anticipated. The results of this study should be evaluated in conjunction with other required tests as listed in ISO 100993, Part 3: Tests for Genotoxicity, Carcinogenicity, and Reproductive Toxicology.

Appendix 2:

Bacterial Mutation Assay Plate Incorporation Assay Results

	Concentration µg per Plate	TA98		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	69	66	68
	1500	60	81	71
	500	98	62	80
	150	43	81	62
	50	54	76	65
	15	58	88	73
	5.0	98	64	81
	1.5	55	82	69
Test Solution w/o S9	5000	96	78	87
	1500	42	74	58
	500	73	78	76
	150	86	62	74
	50	75	43	59
	15	73	60	67
	5.0	63	68	66
	1.5	67	73	70
DI Water w/S9		53	60	57
DI Water w/o S9		79	84	82
2-aminoanthracen w/ S9		390	340	365
2-nitrofluorene w/o S9		150	165	158
Historical Count Positive w/S9		43-1893		
Historical Count Positive w/o S9		39-1871		
Historical Count Negative w/S9		4-69		
Historical Count Negative w/o S9		3-59		

*CFU = Colony Forming Units

*Mean = Average of duplicate plates

	Concentration µg per Plate	TA100		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	132	228	180
	1500	144	164	154
	500	108	152	130
	150	84	160	122
	50	118	118	118
	15	176	188	182
	5.0	148	140	144
	1.5	100	180	140
Test Solution w/o S9	5000	232	248	240
	1500	392	352	372
	500	212	208	210
	150	128	124	126
	50	156	200	178
	15	156	160	158
	5.0	156	140	148
	1.5	96	104	100
DI Water w/S9		136	144	140
DI Water w/o S9		1060	180	143
2-aminoanthracen w/ S9		810	812	811
Sodium azide w/o S9		1000	640	820
Historical Count Positive w/S9		224-3206		
Historical Count Positive w/o S9		226-1837		
Historical Count Negative w/S9		55-268		
Historical Count Negative w/o S9		47-250		

*CFU = Colony Forming Units

*Mean = Average of duplicate plates

	Concentration µg per Plate	TA1537		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	7	10	9
	1500	11	4	8
	500	10	8	9
	150	7	11	9
	50	8	4	6
	15	5	8	7
	5.0	8	3	6
	1.5	8	6	7
Test Solution w/o S9	5000	26	15	21
	1500	11	9	10
	500	6	13	10
	150	13	6	10
	50	7	8	8
	15	13	7	10
	5.0	14	7	11
	1.5	8	13	11
DI Water w/S9		192	184	188
DI Water w/o S9		132	156	144
2-aminoanthracen w/ S9		50	60	60
2-aminoacridine w/o S9		520	792	656
Historical Count Positive w/S9		13-1934		
Historical Count Positive w/o S9		17-4814		
Historical Count Negative w/S9		0-41		
Historical Count Negative w/o S9		0-29		

*CFU = Colony Forming Units

*Mean = Average of duplicate plates

	Concentration µg per Plate	TA1535		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	11	19	15
	1500	18	17	18
	500	11	19	15
	150	15	12	14
	50	16	14	15
	15	7	9	8
	5.0	16	13	15
	1.5	7	20	14
Test Solution w/o S9	5000	11	10	11
	1500	17	12	15
	500	12	8	10
	150	12	10	11
	50	7	12	10
	15	7	12	10
	5.0	12	13	13
	1.5	11	8	10
DI Water w/S9		13	18	16
DI Water w/o S9		10	16	13
2-aminoanthracen w/ S9		170	260	220
Sodium azide w/o S9		544	480	512
Historical Count Positive w/S9		22-1216		
Historical Count Positive w/o S9		47-1409		
Historical Count Negative w/S9		1-50		
Historical Count Negative w/o S9		1-45		

*CFU = Colony Forming Units

*Mean = Average of duplicate plates

	Concentration µg per Plate	WP2uvrA		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	44	60	52
	1500	62	70	66
	500	68	69	69
	150	41	50	46
	50	56	38	47
	15	56	75	66
	5.0	75	74	75
	1.5	52	69	51
Test Solution w/o S9	5000	35	60	48
	1500	65	66	66
	500	47	64	56
	150	63	47	55
	50	71	51	61
	15	74	70	72
	5.0	73	56	65
	1.5	66	76	71
DI Water w/S9		33	66	50
DI Water w/o S9		68	71	70
2-aminoanthracen w/ S9		590	680	640
Methylmethanesulfonate w/o S9		250	211	231
Historical Count Positive w/S9		44-1118		
Historical Count Positive w/o S9		42-1796		
Historical Count Negative w/S9		8-80		
Historical Count Negative w/o S9		8-84		

*CFU = Colony Forming Units

*Mean = Average of duplicate plates



OECD 202 Acute *Daphnia* Assay

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1696

Lot #: NC151204-F

Sponsor: Active Micro Technologies, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Erica Segura

Principle Investigator: Maureen Danaher

Test Performed:

OECD 202

Daphnia spp. Acute Immobilization Test

Introduction

The purpose of the present study is to determine the toxicity of **Leucidal® Liquid Complete** by exposing *Daphnia* spp. to the test substance for 48 hours and measuring the immobilization rate against the control. The present study defines an organism as being immobilized when it does not move for 15 seconds after the test vessel is gently shaken.

OECD Guideline 202 on “*Daphnia* spp., Acute Immobilization Test and Reproduction Test”, adopted in 1984, included two parts: Part I – the 24 hour EC₅₀ acute immobilization test and Part II – the reproduction test (at least 14 days). Revision of the reproduction test resulted in the adoption and publication of Test Guideline 211 on “*Daphnia magna* Reproduction Test” in September 1998. Consequently, the new version of Guideline 202 is restricted to the acute immobilization test.

Assay Principle

Young daphnids, aged less than 24 hours at the start of the test, are exposed to the test substance at a range of concentrations for a period of 48 hours. Immobilization is recorded at 24 hours and 48 hours and compared with control values. The results are analyzed in order to calculate the EC₅₀ at 48 hours. EC₅₀ is the concentration estimated to immobilize 50% of the daphnids within a stated exposure period. Immobilization refers to those animals that are not able to swim within 15 seconds after gentle agitation of the test vessel, even if they can still move their antennae.

The water solubility and vapor pressure of the test substance should be known. A reliable analytical method for the quantification of the substance in the test solutions with reported recovery efficiency and limit of determination should also be available.

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This information is offered solely for your investigation, verification, and consideration.

A reference substance may be tested for EC₅₀ as a means of assuring that the test conditions are reliable.

For this assay to be valid, the following performance criteria apply:

- In the control, not more than 10% of the daphnids should have been immobilized.
- The dissolved oxygen concentration at the end of the test should be at least 3 mg/L in control and test vessels.

Materials

- Glass Test Tubes and/or Beakers
- Dissolved Oxygen Meter
- pH Meter
- Temperature Control Apparatus
- Total Organic Carbon (TOC) Analyzer
- Chemical Oxygen Demand (COD) Analyzer
- *Daphnia magna* Straus
 - Use organisms less than 24 hours old. Do not use first offspring of parents.
- Water
 - Use water suitable for culturing and testing *Daphnia* spp. It can be natural water (surface water or groundwater), dechlorinated tap water, or artificially prepared water (Table 1), but must satisfy the conditions listed in Table 2. Do not use Elendt M4 or M7 media or water containing chelating agents for testing metal-containing substances.

Substance	Concentration
Particulate Matter	<20 mg/L
Total Organic Carbon	<2 mg/L
Unionized Ammonia	<1 ug/L
Residual Chlorine	<10 ug/L
Total Organophosphorus Pesticides	<50 ng/L
Total Organochlorine Pesticides plus Polychlorinated Biphenyls	<50 ng/L
Total Organic Chlorine	<25 ng/L

Table 1: Chemical Characteristics of Suitable Water

Substance	Amount Added to 1 Liter Water	To prepare the reconstituted water, add the following volumes of stock solutions to 1 liter water
Calcium Chloride	11.76 grams	25 mL
Magnesium Sulfate	4.93 grams	25 mL
Sodium Bicarbonate	2.59 grams	25 mL
Potassium Chloride	0.23 grams	25 mL

Table 2: Examples of Suitable Reconstituted Test Water

Methods

Test Conditions

- **Test Method**
 - Test is performed under a static, semi-static, or flow-through condition. If test substance is unstable, a semi-static or flow-through test is recommended.
- **Exposure Period**
 - 48 hours
- **Test Volume**
 - At least 2 milliliters
- **Number of Test Organisms**
 - At least 20 organisms for each test concentration and the control.
- **Test Concentration**
 - Adopt a concentration range of at least 5 concentrations, with the highest concentration inducing 100% immobilization and no effect at the lowest concentration.
- **Culture Method**
 - Illumination: The photoperiod is set to 16 hours light and 8 hours dark
 - Temperature: The temperature is between 18°C to 22°C
 - Dissolved Oxygen Concentration: Must be kept at 3mg/L or higher
 - Feeding: Do not feed test organisms

Observation

- Observe mobility of the organisms at least twice (i.e., at 24 and 48 hours after exposure).
- The organisms are considered immobilized when they do not move for 15 seconds after test vessel is gently shaken.

Measurement of Test Substance Concentrations

- At the beginning and end of exposure, measure test substance concentrations at the lowest and highest test concentration groups.
 - For volatile or adsorptive substances, additional measurements are recommended at 24 hours intervals during exposure period.

Test Condition Measurements

- Measure dissolved oxygen in the control and at the highest test concentration at the beginning and end of the exposure period.
- Measure pH in the control and at the highest test concentration at the beginning and end of the exposure period.
- Water temperature should be measured at the beginning and end of the exposure period.

Data and Reporting**I. Data**

- a. Data should be summarized in tabular form, showing for each treatment group and control, the number of daphnids used, and immobilization at each observation. The percentages immobilized at 24 and 48 hours are plotted against test concentrations. Data are analyzed by appropriate statistical methods (e.g. probit analysis, etc.) to calculate the slopes of the curves and the EC_{50} with 95% confidence limits ($p = 0.95$).
- b. Where the standard methods of calculating the EC_{50} are not applicable to the data obtained, the highest concentration causing no immobility and the lowest concentration producing 100% immobility should be used as an approximation for the EC_{50} (this being considered the geometric mean of these two concentrations).

II. Test Report

- a. The test report must include the following:
 - i. Test substance:
 1. Physical nature and relevant physical-chemical properties
 2. Chemical identification data, including purity
 - ii. Test species:
 1. Source and species of *Daphnia*, supplier of source (if known), and the culture conditions (including source, kind and amount of food, feeding frequency)
 - iii. Test conditions:
 1. Description of test vessels: type and volume of vessels, volume of solution, number of daphnids per test vessel, number of test vessels (replicates) per concentration
 2. Methods of preparation of stock and test solutions including the use of any solvent or dispersants, concentrations used
 3. Details of dilution water: source and water quality characteristics (pH, hardness, Ca/Mg ratio, Na/K ratio, alkalinity, conductivity, etc); composition of reconstituted water if used
 4. Incubation conditions: temperature, light intensity and periodicity, dissolved oxygen, pH, etc.
 - iv. Results:
 1. The nominal test concentrations and the result of all analyses to determine the concentration of the test substance in the test vessels; the recovery efficiency of the method and the limit of determination should also be reported
 2. All physical-chemical measurements of temperature, pH and dissolved oxygen made during the test
 3. The EC_{50} at 48 hours for immobilization with confidence intervals and graphs of the fitted model used for calculation, the slopes of the dose-response curves and their standard error; statistical procedures used for determination of EC_{50} .

Results

General Information:

Name of new chemical substance	Leucidal® Liquid Complete		
INCI Nomenclature	<i>Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract</i>		
CAS number	84775-94-0 & 68333-16-4 & 8001-31-8		
Structural or rational formula (if neither is available, summarize its formulation method)	Biotechnology/Botanical <i>Leuconostoc/Raphanus Sativus & Lactobacillus Cocos Nucifera</i>		
Molecular weight	3345 Daltons		
Purity of the new chemical substance used for the test (%)	100%		
Lot number of the new chemical substance used for the test	NC151204-F		
Names and contents of impurities	n/a		
Solubility in water	100%		
Properties at room temperature	Clear to Hazy Liquid		
Stability	Stable under normal conditions		
Solubility in solvents, etc.	Solvent	Solubility	Stability in solvent
	n/a	n/a	n/a

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This information is offered solely for your investigation, verification, and consideration.

Test Materials and Methods:

Items			Contents
Test Organisms	Species		<i>Daphnia magna</i>
	Source		Carolina Biological Supply Company
	Reference substance (EC ₅₀)		Potassium dichromate (0.94 mg/L)
Culture	Kind of Medium		Elendt Medium M4
	Conditions (Temperature/Photoperiod)		20°C/16 Hour Light-8 Hour Dark
Test Conditions	Test Vessel		Glass
	Material Water	Kind	Elendt Medium M4
		Hardness	250 mg/L
		pH	7.4
	Date of Exposure		08/10/2015
	Test Concentrations		200, 90.9, 41.3, 18.8, 8.5 mg/L
	Number of organisms		120
	Number of Replicates	Exposure Group	4
		Control Group	4
	Test Solution Volume		2 mL
	Vehicle	Use or Not	N/A
		Kind	N/A
		Concentration	N/A
		Number of Replicates	N/A
	Culture Method (Static, Semi-Static, Flow-Through)		Static
	Water Temperature		20°C ± 2°C
	Dissolved Oxygen Concentration (DO)		3 mg/L
	Photoperiod		16 Hour Light-8 Hour Dark
	Statistical Method		Probit Analysis

Test Results:

Items		Contents
Toxicity Value	48hr EC50	132.9 mg/L
Exposure Concentrations Used for Calculation	Nominal Values	200, 90.9, 41.3, 18.8, 8.5 mg/L
Remarks		Not harmful to aquatic organisms

Discussion

After 48 hours, the EC50 value for **Leucidal[®] Liquid Complete** was determined to be 132.9 mg/L. The conditions of OECD guideline 202 for the validity of the test were adhered to: The immobility of controls in purified drinking water (dilution water) did not exceed 10%. According to the EU Directive 93/67/EEC, this product is not classified and therefore not harmful to aquatic organisms.



OECD 301B Ready Biodegradability Assay

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Tradename: Leucidal® Liquid Complete

Code: M15024

CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8

Test Request Form #: 1694

Lot #: NC151204-F

Sponsor: Active Concepts, LLC; 107 Technology Drive Lincolnton, NC 28092

Study Director: Erica Segura

Principle Investigator: Maureen Danaher

Test Performed:

OECD 301 B

Ready Biodegradability: CO₂ Evolution (Modified Sturm Test)

Introduction

A study was conducted to assess the readily biodegradability of **Leucidal® Liquid Complete** in an aerobic aqueous medium. In the OECD guideline 301 for ready biodegradability, six methods are provided as options. This report uses method B, CO₂ Evolution, also known as a Modified Sturm Test. This method was chosen based on the solubility, volatility, and adsorbing capabilities of the test sample.

Assay Principle

A solution or suspension of the test substance in a mineral medium is inoculated and incubated under aerobic conditions in the dark or in diffuse light. The amount of DOC (Dissolved Organic Carbon) in the test solution due to the inoculum should be kept as low as possible compared to the amount of organic carbon due to the test substance. Allowance is made for the endogenous activity of the inoculum by running parallel blanks with inoculum but without test substance. A reference compound is run in parallel to check the procedures' operation.

In general, degradation is followed by the determination of parameters such as DOC, carbon dioxide production, and oxygen uptake. Measurements are taken at sufficiently frequent intervals to allow the identification of the beginning and end of biodegradation.

Normally this test lasts for 28 days, but it may be ended before that time if the biodegradation curve reaches a plateau for at least three determinations. Tests may also be prolonged beyond 28 days when the curve shows that biodegradation has started but the plateau has not yet been reached. In such cases the test substance would not be classified as readily biodegradable.

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The pass levels for ready biodegradability are 70% removal of DOC and 60% of ThOD (Theoretical Oxygen Demand) or ThCO₂ (Theoretical Carbon Dioxide) production for respirometric methods. They are lower in the respirometric methods since, as some of the carbon from the test chemical is incorporated into new cells, the percentage of CO₂ produced is lower than the percentage of carbon being used. These pass values have to be reached in a 10-day window within the 28-day period of the test. The 10-day window begins when the degree of biodegradation has reached 10% DOC, ThOD, or ThCO₂ and must end before day 28 of the test. Test substances which reach the pass levels after the 28-day period are not deemed to be readily biodegradable.

In order to check the procedure, reference compounds which meet the criteria for ready biodegradability are tested by setting up an appropriate vessel in parallel as part of normal test runs. Suitable compounds are freshly distilled aniline, sodium acetate, and sodium benzoate. These compounds all degrade in this method even when no inoculum is deliberately added.

Because of the nature of biodegradation and of the mixed bacterial populations used as inocula, determinations should be carried out at least in duplicate. It is usually found that the larger the concentration of microorganisms initially added to the test medium, the smaller the variation between replicates.

Materials

- Water
 - Deionized or distilled, free from inhibitory concentrations of toxic substances
 - Must contain no more than 10% of the organic carbon content introduced by the test material
 - Use only one batch of water for each series of tests
- Mineral media
 - To prepare the mineral medium, mix 10 mL of solution A with 800 mL water. Then add 1 mL each of solutions B, C, and D and make up to 1 liter with water.
 - Solution A (Dissolve in water and make up to 1 liter; pH 7.4)
 - Potassium dihydrogen orthophosphate, KH₂PO₄.....8.5g
 - Dipotassium hydrogen orthophosphate, K₂HPO₄.....21.8g
 - Disodium hydrogen orthophosphate dehydrate, Na₂HPO₄·2H₂O.....33.4g
 - Ammonium chloride, NH₄Cl.....0.5g
 - Solution B (Dissolve in water and make up to 1 liter)
 - Calcium chloride, anhydrous, CaCl₂.....27.50g
 - Or
 - Calcium chloride dehydrate, CaCl₂·2H₂O.....36.40g
 - Solution C (Dissolve in water and make up to 1 liter)
 - Magnesium sulphate heptahydrate, MgSO₄·7H₂O..... 22.50g
 - Solution D (Dissolve in water and make up to 1 liter.)
 - Iron (III) chloride hexahydrate, FeCl₃·6H₂O.....0.25g
 - Flasks, 2-5 liters each, fitted with aeration tubes reaching nearly to the bottoms of the vessels and an outlet
 - Magnetic stirrers
 - Gas absorption bottles
 - Device for controlling and measuring air flow
 - Apparatus for carbon dioxide scrubbing, for preparation of air which is free from carbon dioxide; alternatively, a mixture of CO₂-free oxygen and CO₂-free nitrogen from gas cylinders in the correct proportions (20% O₂ : 80% N₂)
 - Device for determination of carbon dioxide, either titrimetrically or by some form of inorganic carbon analyzer

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- Stock solutions of test substances
 - When solubility of the substance exceeds 1 g/L, dissolve 1-10 g, as appropriate, of test or reference substance in water and make up to 1 liter. Otherwise, prepare stock solutions in mineral medium or add the chemical directly to the mineral medium, making sure it
- Inoculum
 - The inoculum may be derived from the following sources
 - Activated sludge
 - Sewage effluents
 - Surface waters
 - Soils
 - Or from a mixture of these.
 - Inoculum may be pre-conditioned to the experimental conditions, but not pre-adapted to the test substance. Pre-conditioning consists of aerating activated sludge in mineral medium or secondary effluent for 5-7 days at the test temperature. Pre-conditioning sometimes improves the precision of the test method by reducing blank values.

Methods

- I. Preparation of flasks: As an example, the following volumes and weights indicate the values for 5-liter flasks containing 3 liters of suspension. If smaller volumes are used, modify the values accordingly.
 - a. To each 5-liter flask, add 2,400 mL mineral medium.
 - b. Add an appropriate volume of the prepared activated sludge to give a concentration of suspended solids of not more than 30 mg/L in the final 3 liters of inoculated mixture. Alternatively, first dilute the prepared sludge to give a suspension of 500-1000 mg/L in the mineral medium before adding an aliquot to the contents of the 5-liter flask to attain a concentration of 30 mg/L.
 - c. Aerate these inoculated mixtures with CO₂-free air overnight to purge the system of carbon dioxide.
 - d. Add the test material and reference compound, separately, as known volumes of stock solutions, to replicate flasks to yield concentrations, contributed by the added chemicals, of 10 – 20 mg DOC or TOC per liter. Leave some flasks without addition of chemicals as inoculum controls. Add poorly soluble test substances directly to the flasks on a weight or volume basis. Make up the volumes of suspensions in all flasks to 3 liters by the addition of mineral medium previously aerated with CO₂-free air.
 - e. If required, use one flask to check the possible inhibitory effect of the test substance by adding both the test and reference substances at the same concentrations as present in the other flasks.
 - f. If required, check whether the test substance is degraded abiotically by using a sterilized uninoculated solution of the chemical. Sterilize by the addition of a toxic substance at an appropriate concentration.
 - g. If barium hydroxide is used, connect three absorption bottles, each containing 100 mL of 0.0125M barium hydroxide solution, in series to each 5-liter flask. The solution must be free of precipitated sulfate and carbonate and its strength must be determined immediately before use.
 - h. If sodium hydroxide is used, connect two traps, the second acting as a control to demonstrate that all the carbon dioxide was absorbed in the first. Absorption bottles fitted with serum bottle closures are suitable. Add 200 mL 0.05M sodium hydroxide to each bottle. This is sufficient to absorb the total quantity of carbon dioxide evolved when the test substance is completely degraded.
 - i. In a typical run, the following flasks are used:
 - i. Flasks 1 & 2: containing test substance and inoculum (test suspension)
 - ii. Flasks 3 & 4: containing only inoculum (inoculum blank)
 - iii. Flask 5: containing reference compound and inoculum (procedure control)
 - iv. Flask 6: containing test substance and sterilizing agent (abiotic sterile control)
 - v. Flask 7: containing test substance, reference compound and inoculum (toxicity control)

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- II. Start the test by bubbling CO₂-free air through the suspensions at a rate of 30-100 mL/minute.
- III. CO₂ Determination
 - a. It is mandatory to follow the CO₂ evolution from the test suspensions and inoculum blanks in parallel and it is advisable to do the same for the other test vessels.
 - b. During the first ten days it is recommended that analyses of CO₂ should be made every second or third day and then at least every fifth day until the 28th day so that the 10-day window period can be identified. On the days of CO₂ measurement, disconnect the barium hydroxide absorber closest to the test vessel and titrate the hydroxide solution with 0.05M HCl using phenolphthalein as the indicator. Move the remaining absorbers one place closer to the test vessel and place a new absorber containing 100 mL fresh 0.0125M barium hydroxide at the far end of the series. Make titrations are needed (for example, when substantial precipitation is seen in the first trap and before any is evident in the second, or at least weekly). Alternatively, with NaOH as absorbent, withdraw a sample of the sodium hydroxide solution from the absorber nearest to the test vessel using a syringe. The sample volume needed will depend on the carbon analyzer used, but sampling should not significantly change the absorbent volume over the test period. Inject the sample into the IC part of the carbon analyzer for analysis of evolved carbon dioxide directly. Analyze the contents of the second trap only at the end of the test in order to correct for any carry-over of carbon dioxide.
 - c. On the 28th day withdraw samples, optionally, for DOC and/or specific chemical analysis. Add 1 mL of concentrated hydrochloric acid to each test vessel and aerate them overnight to drive off the carbon dioxide present in the test suspensions. On day 29 make the last analysis of evolved carbon dioxide.

Data and Reporting

- I. Treatment of Results
 - a. Data from the test should be entered onto the data sheet below.
 - b. The amount of CO₂ produced is calculated from the amount of base remaining in the absorption bottle. When 0.0125M Ba(OH)₂ is used as the absorbent, the amount remaining is assessed by titrating with 0.05M HCl.
 - c. Since 1 mmol of CO₂ is produced for every mol of Ba(OH)₂ reacted to BaCl₂ and 2 mmol of HCl are needed for the titration of the remaining Ba(OH)₂ and given that the molecular weight of CO₂ is 44 g, the weight of CO₂ produced (in mg) is calculated by:

$$\frac{0.05 \times (50 - \text{mL HCl Titrated}) \times 44}{2} = 1.1 \times (50 - \text{mL HCl Titrated})$$

Therefore, the factor to convert volume of HCl titrated to mg CO₂ produced is 1.1 in this case. Calculate the weights of CO₂ produced from the inoculum alone and from the inoculum plus test substance using the respective titration values. The difference is the weight of CO₂ produced from the test substance alone.

- d. The percentage biodegradation is calculated from:

$$\% \text{ Degradation} = \frac{\text{mg CO}_2 \text{ Produced}}{\text{ThCO}_2 \times \text{mg Test Substance Added}} \times 100$$

Or

$$\% \text{ Degradation} = \frac{\text{mg CO}_2 \text{ Produced}}{\text{mg TOC Added in Test} \times 3.67} \times 100$$

Where 3.67 is the conversion factor $\left(\frac{44}{12}\right)$ for carbon to carbon dioxide

- e. When NaOH is used as the absorbent, calculate the amount of CO₂ produced after any time interval from the concentration of inorganic carbon and the volume of absorbent used. Calculate the percentage degradation from:

$$\% \text{ ThCO}_2 = \frac{\text{mg IC from Test Flask} - \text{mg IC from Blank}}{\text{mg TOC Added as Test Substances}} \times 100$$

- f. Display the course of degradation graphically and indicate the 10-day window. Calculate and report the percentage removal achieved at the plateau, at the end of the test, and/or at the end of the 10-day window, whichever is appropriate.
- g. When appropriate, calculate DOC removals using the equation given in 301 A paragraph 27.
- h. When an abiotic control is used, calculate the percentage abiotic degradation by:

$$\% \text{ Abiotic Degradation} = \frac{\text{CO}_2 \text{ Produced by Sterile Flask After 28 Days (mg)}}{\text{ThCO}_2 \text{ (mg)}} \times 100$$

Validity of Tests

- i. The IC content of the test substance suspension in the mineral medium at the beginning of the test must be less than 5% of the TC, and the total CO₂ evolution in the inoculum blank at the end of the test should not normally exceed 40 mg/L medium. If values greater than 70 mg CO₂/L are obtained, the data and experimental technique should be examined critically.

Data Sheet

Laboratory	Active Concepts Tissue Culture Laboratory		
Test Start Date	12/07/2015		
Test Substance	Name	Leucidal® Liquid Complete	
	Stock Solution Concentration	2 g/L	
	Initial Concentration in Medium	20 mg/L	
Inoculum	Source	Activated Sludge	
	Treatment Given	Centrifugation	
	Pre-conditioning	N/A	
	Suspended Solids Concentration in Reaction Mixture	4 mg/L	
Reference Material	Sodium Benzoate	Concentration	20 mg/L
CO ₂ Production and Degradability	Method	Ba(OH) ₂	0.0125M
		NaOH	N/A
		Other	N/A
Total Contact Time	28 Days		
Total CO ₂ Evolved Measurements	Days	2, 4, 11, 17, 23, 28	
Degradation Over Time	95.3% and 89.2% after 28 days		
Remarks	Test material was readily biodegradable		
Conclusion	This test met the criteria for a valid assay		

Discussion

Based on the testing conducted in accordance with the specified test method, **Leucidal[®] Liquid Complete** achieved 92.3% biodegradation after 28 days of testing. The product met method requirements for the Readily Biodegradable classification.



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(704) 276-7100 • Fax (704) 276-7101

Date Issued: January 28, 2016

ALLERGEN DECLARATION

RE: Leucidal® Liquid Complete (M15024)

Please be advised that this form is to certify that the above referenced product, manufactured at Active Micro Technologies, LLC, does not contain any of the allergens listed below:

Eggs – or egg products

Milk – or milk products (includes whey, lactose, casein, milk, cream)

Peanuts – or peanut products

Fish – (includes fish (surimi, cod, pollack, whitefish)

Shellfish – (shrimp, lobster, crab, clams, etc.)

Soybeans – or soybean products (includes soya powder, protein, oil, lecithin, tofu)

Wheat – or wheat products (includes Gluten)

Tree nuts – (almond, brazil nut, cashew, chestnut, hazelnut, filbert, pine nuts (pinyon, pinon), pistachio, pecan, macadamia, walnut).

Palm Oil – or palm kernel oil

Corn – or corn products

If you have any further questions or concerns, please contact us at: 1-704-276-7100

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Heavy Metals Statement

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

May 10, 2016

To Whom It May Concern,

This letter is to certify that Leucidal® Liquid Complete (M15024) has the following heavy metals profile:

Heavy Metals:	Less than 20 ppm
Lead:	Less than 10 ppm
Antimony:	Less than 5 ppm
Arsenic:	Less than 2 ppm
Mercury:	Less than 1 ppm
Cadmium:	Less than 1 ppm

****Please note:** The above levels illustrate the Maximum Limits. Values for Lead, Antimony, Mercury and Cadmium do not appear on the Specification for Leucidal® Liquid Complete.

Best Regards,

Tomorrow's Vision... *Today!*®

Heather Ferguson | R&D Coordinator

107 Technology Drive | Lincolnton, NC 28092

Direct: 704.276.7083 | Main: 704.276.7100 | Fax: 704.276.7101

Email: hferguson@activeconceptsllc.com

www.activeconceptsllc.com



Certificate of Origin

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal® Liquid Complete Code: M15024

Active Micro Technologies, LLC certifies that all raw material(s) used to manufacture the above listed ingredient originate in the United States of America.

Active Micro Technologies, LLC certifies that all raw material(s) used to manufacture the above listed ingredient are prepared from non-GMO organisms and are BSE-Free.

Active Micro Technologies, LLC certifies the below sources for each item listed in our INCI Name:

<u>INCI Name</u>	<u>Source</u>
Water	Water
Leuconostoc/Radish Root Ferment Filtrate	Bacteria/Plant (<i>Leuconostoc/Raphanus sativus</i>)
Lactobacillus	Bacteria (<i>Lactobacillus</i>)
Cocos Nucifera (Coconut) Fruit Extract	Plant (<i>Cocos nucifera</i>)

Active Micro Technologies, LLC certifies that the above listed ingredient can be classified as Vegan Compliant.

Active Micro Technologies, LLC certifies that the above listed ingredient has never been tested on animals.



Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal® Liquid Complete

Page: 1/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

SECTION 1. IDENTIFICATION

Product Name/Identifier	Leucidal® Liquid Complete
Product Code	M15024
Recommended Use	Topical Cosmetic Use; Antimicrobial
Restrictions on Use	Refer to the detailed list of labeling/restrictions (Section 15 Regulatory Information)
Supplier/Manufacturing Site	Active Micro Technologies, LLC
Address	107 Technology Drive Lincolnton, NC 28092, USA
Telephone No. (24hrs)	1-704-276-7100
Fax No.	1-704-276-7101
Emergency Telephone #	1-704-276-7100 (Mon-Fri: 8:00AM – 5:00PM EST)

SECTION 2. HAZARD(S) IDENTIFICATION

Classification:

GHS / CLP

Basis for Classification: Based on present data no classification and labeling is required according to GHS, taking into account the national implementation (United Nations version 2011)

USA

OSHA Regulatory Status: This material is non-hazardous as defined by the American OSHA Hazard Communication Standard (29 CFR 1910.1200).

Europe

Basis for Classification: -According to present data no classification and labeling is required according to Directives 67/548/EEC or 1999/45/EC.
-This product is not classified as hazardous to health or environment according to the CLP regulation.

Labeling Elements:

Pictograph: No hazard symbol expected

Hazard statements/Signal Word: Not applicable

Precautionary statements: P233: Keep container tightly closed
P281: Use personal protective equipment as required
P402: Store in a dry place
P404: Store in a closed container
P410: Protect from sunlight
P411: Store at temperatures not exceeding 25°C

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Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 2/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

Other hazards which do not result in classification:

No particular fire or explosion hazard.

By mechanical effect: No particular hazards.

By hydroscopic effect: No particular hazards.

US NFPA 704 (National Fire Protection Association) Hazard Rating System:

Health hazard: Rating 0; Normal Material

Flammability: Rating 0, Will Not Burn

Reactivity: Rating 0, Stable

Other Hazard Information: None

Results of PBT and vPvB assessment:

-PBT: Not applicable

-vPvB: Not applicable

SECTION 3. COMPOSITION / INFORMATION ON INGREDIENTS

Common Chemical Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract

Generic name:

Chemical Family: Blend

Description: Mixture: consisting of the following components. This section describes all components of the mixture

<u>Substance</u>	<u>CAS Numbers</u>	<u>EC Numbers</u>	<u>Percentage</u>
Water	7732-18-5	231-791-2	37.50%
Leuconostoc/Radish Root Ferment Filtrate	84775-94-0	283-918-6	37.50%
Lactobacillus	68333-16-4	N/A	20.00%
Cocos Nucifera (Coconut) Fruit Extract	8001-31-8	232-282-8	5.00%

Formula: Not applicable

SECTION 4. FIRST-AID MEASURES

General: In all cases of doubt, or when symptoms persist, seek medical attention.

Inhalation: Move to fresh air from exposure area. Get medical attention for any breathing difficulty.

Skin contact: Rinse with soap and water. Get medical advice if irritation develops.

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Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 3/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

Eye contact: Immediately rinse with water for at least 15 minutes, while keeping the eyes wide open. Consult with a physician.

Ingestion: Consult with a physician.

Protection of first-aiders: No special protection required.

SECTION 5. FIRE-FIGHTING MEASURES

Fire and explosion hazards: Not considered to be a fire and explosion hazard

Extinguishing media:

Suitable: Water, dry chemicals, foam & carbon dioxide.
Not suitable: None known

Fire fighting: Move container from fire area if it can be done without risk.
Avoid inhalation of material or combustion by-products.
Stay upwind and keep out of low area

Protection for fire-fighters: Boots, gloves, goggles.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions: Avoid contact with eyes.
Personal Protective Equipment:
-Protective goggles

Environmental precautions: Prevent entry into sewers and waterways. Do not allow material to contaminate ground water system

Methods for cleaning up:

Recovery: Pick up free liquid for recycling or disposal. Residual liquid can be absorbed on an inert material.

Cleaning/Decontamination: Wash non-recoverable remainder with water.

Disposal: For disposal of residues refer to sections 8 & 13.

SECTION 7. HANDLING AND STORAGE

Handling

Technical measures: Labeling: Keep out of the reach of children.
Prior to use, container must be warmed to 35 - 40°C and mixed until clear.

Measures: For industrial use, only as directed.

Safe handling advice: Wash hands after use. Avoid storage near feed or food stuff.

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Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal® Liquid Complete

Page: 4/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

Storage

Technical measures: Keep container closed.
Recommended Storage Conditions: Store in a cool, dry place. This product should be stored at room temperature (23 - 25°C). It should not be exposed to excessive heat or cold during storage. Do not freeze.

Incompatible products: Avoid contact with strong oxidizers.
Refer to the detailed list of incompatible materials (Section 10 Stability/Reactivity)

Packaging: Product may be packaged in normal commercial packaging.
Packaging materials: Recommended - Polypropylene & High Density Polyethylene

SECTION 8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Precautionary statements: Ensure adequate ventilation

Control parameters

Occupational exposure Limits:

France: Not Determined
ACGIH: Not Determined
Korea: Not Determined
UK: Not Determined

Surveillance procedures: Not Determined
Engineering measures: Not Determined

Personal Protective Equipment:

Respiratory protection: Local exhaust
Hand protection: Protective gloves made of rubber or neoprene.
Eye protection: Safety glasses.
Collective emergency equipment: Eye fountain.
Skin and Body Protection: Suitable protective clothing

Hygiene measures: Handle in accordance with good industrial hygiene and safety practice.

Measures related to the Environment: No particular measures.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance: Clear to hazy liquid
Color (Gardner): 6 Maximum

Odor: Characteristic

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Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 5/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

pH: 5.0 – 9.0

NVM (1g-105°C-1hr): 37.0 – 46.0%

Phenolics (tested as Salicylic Acid): 14.0 – 17.0%

Heavy Metals: < 20 ppm

Arsenic: < 2 ppm

Minimum Inhibitory Concentration

Organism (ATCC#):

E. coli (#8739): 0.50 – 4.00%

S. aureus (#6538): 0.25 – 2.00%

P. aeruginosa (#9027): 0.25 – 2.00%

C. albicans (#10231): 0.25 – 2.00%

A. brasiliensis (#16404): 0.25 – 2.00%

Specific Gravity: Not determined

Vapor density: Not applicable

Boiling Point: 100°C

Freezing Point: 0°C

Melting point: Not applicable

Flash point: > 200°F

Oxidizing properties: Non oxidizing material according to EC criteria.

Solubility:

In water: Soluble

In organic solvents: Not determined

Log P: Not determined

SECTION 10. STABILITY AND REACTIVITY

Stability: Stable under ordinary conditions of use and storage up to one year then re-test to full product specifications to extend shelf life

Hazardous reactions: None known

Conditions to avoid: No dangerous reactions known under use of normal conditions.
Avoid extreme heat.

Materials to avoid: No dangerous reaction known with common products.

Hazardous decomposition products: None known



Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 6/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

SECTION 11. TOXICOLOGICAL INFORMATION

Ingestion:	Not Determined
Dermal:	Non-Irritant (Dermal Irritation Model)
Ocular:	Non-Irritant (Ocular Irritation Model)
Inhalation:	Not Determined
Acute toxicity data:	EC50 (Acute Daphnia): 132.9 mg/L - Not harmful to aquatic organisms
Sensitization:	Non-Primary Sensitizer; Will not cause allergic contact dermatitis (In Chemico Skin Sensitization Direct Peptide Reactivity Assay & In Vitro Skin Sensitization ARE-Nrf2 Luciferase Test Method)
Repeated dose toxicity:	No known effects
Subacute to chronic toxicity:	Not Determined
Mutagenicity:	Non-Mutagenic (OECD471/ISO10993.Part 3 – Genotoxicity: Bacterial Reverse Mutation Test)
Additional Toxicological Information:	This product is not subject to classification according to the calculation method of the General EU Classification Guidelines for Preparations as issued in the latest version.
Specific effects:	
Carcinogenicity:	No known effects
Mutagenicity:	No known effects
Reproductive toxicity:	No known effects
Neuro-toxicity:	No known effects
For more information:	Does not present any particular risk on handling under normal conditions of good occupational hygiene practice.
This product has not been tested for the following:	
-Primary cutaneous and corrosive irritation	
-Acute oral toxicity	

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

Effects on the aquatic environment: Not Determined

Biodegradability:

Persistence: Readily Biodegradable

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Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal® Liquid Complete

Page: 7/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

Bioaccumulation:

Octanol / water partition coefficient: Not Determined

Mobility:

Precipitation:

Expected behavior of the product: Ultimate destination of the product: Soil & sediment.

Other Adverse Effects:

None known

SECTION 13. DISPOSAL CONSIDERATIONS

Residues from product

Prohibition:

Do not allow the product to be released into the Environment.

Destruction/Disposal:

Dispose of in accordance with relevant local regulations

Contaminated packaging

Decontamination/cleaning:

Cleaning is not required prior to disposal.

Destruction/Disposal:

Note: Take all necessary precautions when disposing of this product according to local regulations.

SECTION 14. TRANSPORT INFORMATION

UN Number:

None

UN Shipping Name:

None

Transport Hazard Class:

Not classified as dangerous for transport

Land (rail/road):

Material is not restrictive for land transport and is not regulated by ADR/RID

Sea:

Material is not restrictive for sea transport and is not regulated by IMO/IMDG

Air:

Material is not restrictive for land transport and is not regulated by ICA/IATA

Marine Pollutant:

No

Transport/Additional Information:

Not regulated for US DOT Transport in non-bulk containers

This material is not dangerous or hazardous

Special Precautions for User:

None known

The above regulatory prescriptions are those valid on the date of publication of this sheet. However, given the possible evolution of transport regulations for hazardous materials and in the event of the MSDS in your possession dating back more than 12 months, it is advisable to check their validity with your sales office.



Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 8/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

SECTION 15. REGULATORY INFORMATION

Labeling/Restrictions:

EC regulations:	Not to be used for children under three years of age
Chinese regulations:	Not to be used for children under three years of age
Brazilian regulations:	Not to be used for children under three years of age
ASEAN regulations:	Not to be used for children under three years of age
Mexico regulations:	Not to be used for children under three years of age

Further regulations

United Kingdom: Handle in accordance with relevant British regulation: control of substance Hazardous to Health Regulations Environmental Hygiene Guidance: EH40
Workplace Exposure Limits (revised annually)

Korea regulations:	Industrial safety and hygiene regulation:	No
	Hazardous material control regulation:	No
	Fire prevention regulation:	No

Other regulations:

EINECS inventory status:	Aqua:	231-791-2
	Leuconostoc/Radish Root Ferment Filtrate:	283-918-6
	Lactobacillus:	N/A
	Cocos Nucifera Fruit Extract:	232-282-8
TSCA inventory status:	Exempt	
AICS inventory status:	7732-18-5 & 84775-94-0 & 68333-16-4 & 8001-31-8	
Canadian (CEPA DSL) inventory status:	Listed as Water (DSL) & Radish, ext. (Revised ICL) & Lactobacillus acidophilus (Revised ICL) & Coconut Oil (DSL)	
Japan (MITI list):	Water & Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract	
Korea:	Water & Leuconostoc/Radish Root Ferment Filtrate** & Lactobacillus** & Cocos Nucifera (Coconut) Fruit Extract**	
China inventory status:	Water & Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract	
Philippines inventory status:	Not Listed: Leuconostoc/Radish Root Ferment Filtrate (84775-94-0) & Lactobacillus (68333-16-4)	
	Listed as Water & Coconut Oil	

**Not listed in 2004 CTFA Dictionary – Registered with Personal Care Products Council

Note: The regulatory information given above only indicates the principal regulations specifically applicable to the products described in this sheet. The user's attention is drawn to the possible existence of additional provision which complete these regulations. Please refer to all applicable international, national and local regulations and provisions



Safety Data Sheet

107 Technology Drive • Lincolnton, NC 28092
(704) 276-7100 • Fax (704) 276-7101

Leucidal[®] Liquid Complete

Page: 9/9

Date: 02 / 10 / 2016

Version: 6

Cancels and replaces version: 5

SECTION 16. OTHER INFORMATION

Prohibited uses: For specific uses, food industry, ask the manufacturer for more information.

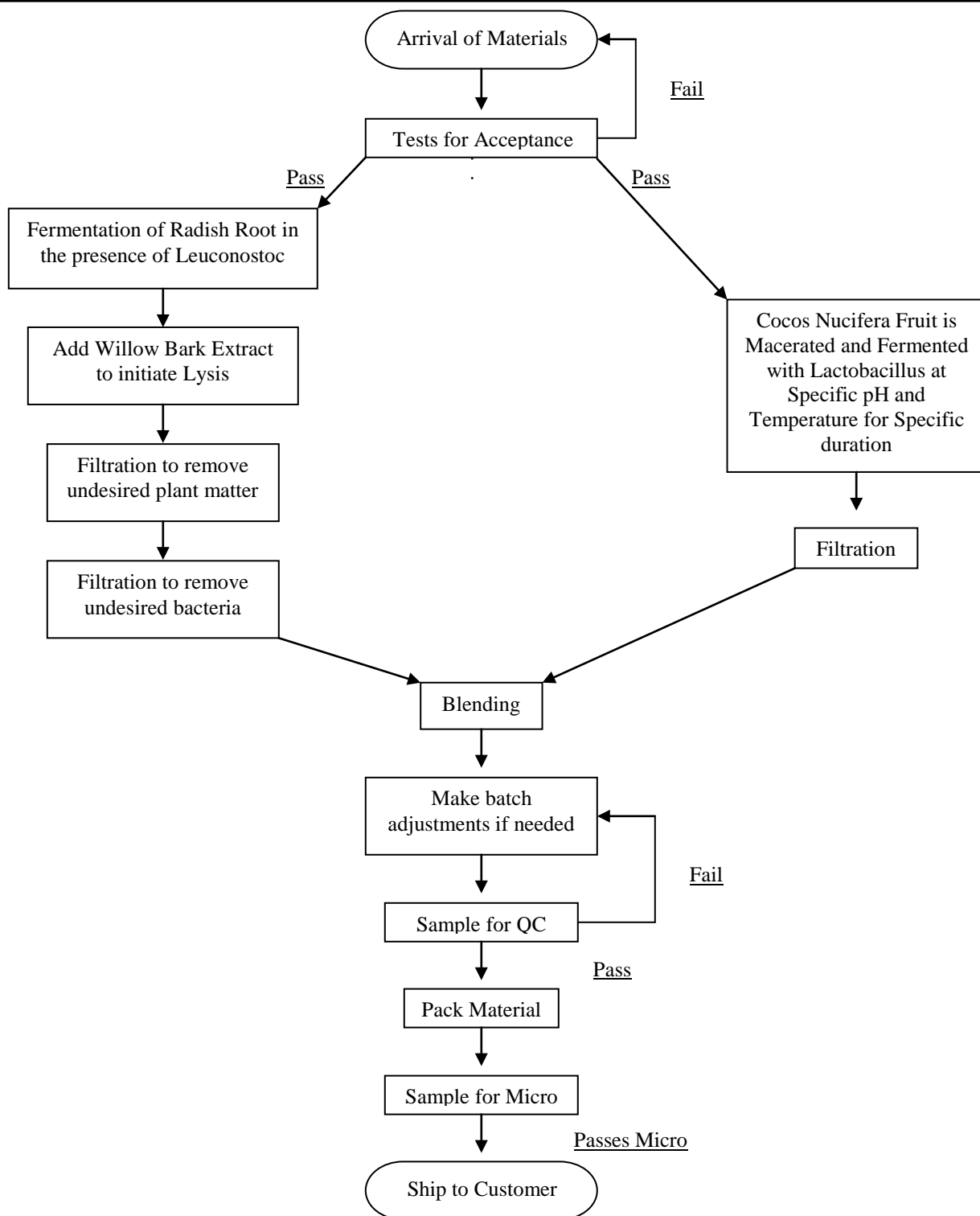
Last Revision Date: 01/29/2016

Preparation Date: 02/10/2016

MSDS summary of changes

- Added Irritation Data – Section 11 (Toxicological Information)
- Added Mutagenicity Data – Section 11 (Toxicological Information)
- Added Acute Toxicity, Sensitization & Mutagenicity Data – Section 11 (Toxicological Information) & Biodegradability Data – Section 12 (Ecological Information)
- Added Minimum Inhibitory Concentration – Section 9 (Physical & Chemical Properties)
- Updated Handling Technical Measures & Storage Recommended Storage Conditions – Section 7 (Handling & Storage)

The information given is based on our knowledge of this product, at the time of publication in good faith. The attention of the user is drawn to the possible risks incurred by using the product for any other purpose other than which it was intended. This is not in any way excuse the user from knowing and applying all the regulations governing their activity. It is sole responsibility of the user to take all precautions required in handling the product. The purpose of mandatory regulation mentioned is to help the user to fulfill his obligations regarding the use of products. This information is not exhaustive, this is not exonerate the user from ensuring that legal obligations other than those mentioned, relating to the use and storage.



Leucidal® Liquid Complete Certificate of Compliance

Code: M15024
INCI Name: Leuconostoc/Radish Root Ferment Filtrate & Lactobacillus & Cocos Nucifera (Coconut) Fruit Extract
INCI Status: Conforms
CAS #: 84775-94-0 & 68333-16-4 & 8001-31-8
EINECS #: 283-918-6 & N/A & 232-282-8

The following information on regulatory clearances is believed to be accurate and is given in good faith as a guide to a global use of our ingredients in cosmetic applications. No representation or warranty as to its competences or accuracy is made. Information is offered for use in general cosmetic applications and may vary in particular applications. Users are responsible for determining the suitability of these products for their own particular use. All regulatory decisions should be made on the advice of your regulatory group or legal counsel.

Country / Regulatory Body	Status of Product
EU (REACH)	Compliant at Suggested Use Levels <u>Labeling requirements:</u> Not to be used for children under three years of age <u>Restrictions:</u> Not to be used in preparations for children under 3 years of age, except for shampoos
USA (TSCA)	Exempt
Australia (AICS)	Compliant
Japan (METI)	Compliant at Suggested Use Levels
Canada (DSL)	Compliant
China (IECSC)	Compliant at Suggested Use Levels <u>Labeling requirements:</u> Not to be used for children under three years of age <u>Restrictions:</u> Not to be used in preparations for children under 3 years of age, except for shampoos
Brazil (ANVISA)	Compliant at Suggested Use Levels <u>Labeling requirements:</u> Not to be used for children under three years of age <u>Restrictions:</u> Not to be used in preparations for children under 3 years of age, except for shampoos
Korea (KECI)	Compliant
Philippines (PICCS)	Contact Us <u>Labeling requirements:</u> Not to be used for children under three years of age <u>Restrictions:</u> Not to be used in preparations for children under 3 years of age, except for shampoos



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Leucidal® Liquid Complete

Code: M15024

Attention must be paid to the use of Leucidal® Liquid Complete in the equivalent of OTC formulations (eg. quasi-drugs in Japan, or therapeutic goods in Australia). Some countries maintain restricted inventories of raw materials that can be used in those applications so more detailed guidance may be required.

Leucidal® Liquid Complete and any components or impurities are in compliance with the rules governing cosmetic products in the European Union (Directive 76/768/ECC & Regulation No. 1223/2009). However, Leucidal® Liquid Complete contains natural phenolics which will test positive for salicylic acid (see also Specification). This should be borne in mind when formulating products containing Leucidal® Liquid Complete. The recommended use levels for Leucidal® Liquid Complete is 2.00 – 4.00%.

Leucidal® Liquid Complete is in compliance with the standardized set of rules developed and approved by the NPA (Natural Products Association).

Leucidal® Liquid Complete is considered a non-hazardous material. All significant toxicological routes of absorption have been considered as well as the systemic effects and margin of safety (MoS) based on a no observed adverse effects level (NOAEL). Due to the restriction placed on animal testing of cosmetic raw materials, and Active Micro Technologies, LLC's internal non-animal testing policy, this product was not tested for NOAEL.

Leucidal® Liquid Complete was tested using *in vitro* dermal and ocular irritation models. This product was found to be non-irritating in both models.

To our knowledge the above material is free of CMR (*) substances, as defined according to Regulation (EC) No 1272/2008 and Cosmetic Regulation (EC) No 1223/2009 as amended.

(*) Carcinogenic, Mutagenic, toxic for Reproduction

Active Micro Technologies, LLC certifies that to the best of our knowledge our product does not contain any material listed on California Proposition 65.

Active Micro Technologies, LLC certifies that Leucidal® Liquid does not contain any materials prohibited by Halal laws.

Leucidal® Liquid Complete is REACH Compliant and free of the following:

- | | |
|---|-------------------------------|
| • Formaldehyde or formaldehyde donors | • Parabens |
| • Glycol ethers | • Paraffin/petroleum products |
| • Gluten | • Phthalates |
| • Lactose | • Polyethylene glycol (PEG) |
| • Nanoparticles | • Residual solvents |
| • Nitrosamines | • Sulfates |
| • Palm oil/palm kernel oil (or derivatives) | • Volatile organic compounds |

Raw Component Regulations

Please note that the below are global regulations for the raw materials used to manufacture Leucidal® Liquid and are not for the product itself.

Leucidal® Liquid contains 14.00 – 17.00% Phenolics, which is the salts and esters of salicylic acid. See below for a list of regulations:

Salicylic Acid and salts:

- **Europe: Maximum Authorized Concentration up to 3.00% (0.50% as acid) when used other than a preservative, depending on the application:**
 - a) Rinse-off products: Up to 3.00%
 - b) Other products: Up to 2.00%
 - *Limitations and requirements: Not to be used in preparations for children under 3, except for shampoos
 - *Conditions of use and warnings which must be printed on the label: Not to be used for children under three years of age (1)
 - *Note (1): Solely for products which might be used for children under three years of age and which remain in prolonged contact with the skin
 - *Intended Purpose must be apparent from the presentation of the final product (e.g. facial toner, anti-acne lotion, peeling gel, etc.)
- **USA: Salicylic Acid is safe when formulated to avoid irritation and to avoid increasing sun sensitivity, or when increased sun sensitivity would be expected, directions for use include the daily use of sun protection.** (*Journal Citation: IJT 22(3):1-108)
- **Japan: Maximum Authorized Concentration:**
 - *Salicylic Acid: 0.20 (per 100 grams)
 - *Salicylic Acid Salts: 1.00 as total (per 100 grams)
- **Canada: Salicylic Acid permitted in concentrations of 2.00% or less**
- **China: Maximum Authorized Concentration of 0.50% (as acid)**
 - *Limitations and requirements: Not to be used in products for children under age 3, except for shampoo
 - *Warnings: Do not use for children under 3
- **Brazil: Maximum authorized concentration 0.50% (as acid):**
 - *Limitations: Not to be used in children's products under 3 years, except for shampoos
 - *Warnings: Not to be used for children under 3 years of age (1)
 - *Note (1): Solely for products which might be used for children under three years of age and which remain in prolonged contact with the skin
- **Mexico: Maximum authorized concentration 0.50% (as acid):**
 - *Limitations: Not to be used in preparations for children under 3 years of age
- **ASEAN: Maximum authorized concentration 0.50% (as acid):**
 - *Limitations: Not to be used in preparations for children under 3 years of age, except for shampoos
 - *Warnings: Not to be used for children under 3 years of age
- **Mercosur: Maximum authorized concentration 0.50% (as acid):**
 - *Limitations: Not to be used in preparations for children under 3 years of age, except for shampoos
 - *Warnings: Not to be used for children under 3 years of age



VERIFICATION OF THE RAW MATERIALS CONFORMITY TO THE ECOCERT AND COSMOS COSMETIC STANDARDS

THIS DOCUMENT IS NOT AN ORGANIC CERTIFICATE

Company: **ACTIVE MICRO TECHNOLOGIES LLC** Attestation n° : 5548

Page 1 on 1

The conformity (conf.) is established according to the requirements related to the raw materials contained in the applicable standard(s).

The present document is only valid for ECOCERT until official COSMOS publication of the raw materials on the website:
<http://www.cosmos-standard-rm.org/>

*reference related to the appendices II and/or V of the Cosmos standard.

Leucidal Liquid Complete (M15024)

Function: **Moisturizing, Skin conditioning, Antimicrobial**

INCI: Leuconostoc/Radish Root Ferment Filtrate (and) Lactobacillus (and) Cocos Nucifera (Coconut) Fruit Extract

Conf. ECOCERT: YES **100 %** of natural origin (**0 %** of physically processed vegetal ingredients)
0 % synthetic

Conf. COSMOS: YES PPAI : **0 %** CPAI : **64 %** Petrochemical moiety : **0 %**
Non natural ingredient : **0 %**

Comments:

Leucidal SF Complete (M15025)

Function: **Moisturizing, Skin conditioning, Antimicrobial**

INCI: Lactobacillus Ferment (and) Lactobacillus (and) Cocos Nucifera (Coconut) Fruit Extract

Conf. ECOCERT: YES **100 %** of natural origin (**0 %** of physically processed vegetal ingredients)
0 % synthetic

Conf. COSMOS: YES PPAI : **0 %** CPAI : **32,5 %** Petrochemical moiety : **0 %**
Non natural ingredient : **0 %**

Comments:

Drawn up in l'Isle Jourdain, valid from 18/02/2016
until 31/12/2016

Matthieu Bouffartigue
Raw Materials Service Manager

WARNING: The present document belongs to ECOCERT Greenlife SAS. It must be erased on ECOCERT request.

The approval of the raw material(s) listed above is PERSONAL to the beneficiary named herein, and the BUYERS of the raw material(s) ARE IN NO EVENT AUTHORIZED TO MAKE REFERENCE TO THE APPROVAL BY ECOCERT GREENLIFE OR TO USE AN ECOCERT LOGO, whether in its communication or on the packaging or labeling of the raw material(s) or of a finished cosmetic product.

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