

ACB Bio-Chelate 5 PF Toxicology Data

Code: 20339PF
INCI Name: Water & Saccharomyces/Zinc Ferment & Saccharomyces/Copper Ferment & Saccharomyces/Magnesium Ferment & Saccharomyces/Iron Ferment & Saccharomyces/Silicon Ferment
CAS #: 7732-18-5 & 8013-01-2 & 8013-01-2 & 8013-01-2 & 8013-01-2 & 8013-01-2
EINECS #: 231-791-2 & 232-387-9 & 232-387-9 & 232-387-9 & 232-387-9 & 232-387-9

Name of Study	Type of Study	Results
RIPT	<i>in-vivo</i>	When tested under 'open patch' conditions as described herein at the dilutions in distilled water listed, ACB Bio-Chelate 5 PF may be considered as non-primary irritant and non-primary sensitizer to the skin.
Dermal & Ocular Irritation Tests	<i>in-vitro</i>	Both the dermal and ocular assays reveal that ACB Bio-Chelate 5 PF is non-irritating and should not cause any of the aforementioned conditions.



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50 HUMAN SUBJECT REPEAT INSULT PATCH TEST
SKIN IRRITATION/SENSITIZATION EVALUATION
(Occlusive Patch)

AMA Ref. No.: MS08.RIPT.L3841O.50.ACTC

Date: January 8, 2009

Sponsor: Active Concepts, LLC
121 Ethel Road West, Suite 3
Piscataway, New Jersey 08854

1.0 Objective:

Consumer products or raw materials designed for consistent reapplication to areas of the skin may, under proper conditions, prove to be contact sensitizers or irritants in certain individuals. It is the intention of a Repeat Insult Patch Test (RIPT) to provide a basis for evaluation of this irritation/sensitization potential if such exists.

2.0 Test Material:

2.1 Test Material Description:

On November 25, 2008 one test sample labeled EN081124-B was received from Active Concepts, LLC and assigned AMA Lab No. L-3841.

2.2 Handling:

Upon arrival at AMA Laboratories, Inc., the test material is assigned a unique laboratory code number and entered into a daily log identifying the lot number, sample description, sponsor, date received and tests requested.

Samples are retained for a period of three months beyond submission of final report unless otherwise specified by the sponsor or, if sample is known to be in support of governmental applications, representative retained samples are kept two years beyond final report submission.

Sample disposition is conducted in compliance with appropriate federal, state and local ordinances.

2.3 Test Material Evaluation Prerequisite:

Prior to induction of a human test panel, toxicology, microbiology or in-vitro performance spectra may be required to assess the feasibility of commencement as dictated by an Institutional Review Board (IRB) described in Section 3.0.

Sponsor purports that prior to sample submission the following tests were conducted with no adverse results and that the test data are on file on their premises and have not been made available to AMA personnel:

- USP or CTFA Preservative Efficacy Test or equivalent
- 90 Day Accelerated Stability and Container Compatibility Study

3.0 Institutional Review Board:

Reference: CFR Title 21 Part 56, Subparts A, B, C, and D. The IRB of AMA Laboratories, Inc., consists of five or more individuals, chosen from within the company for technical expertise and from the local community for lay interaction. The list of IRB members is kept on file at AMA Laboratories, Inc. and is available for inspection during the hours of operation.

4.0 Panel Selection:

4.1 Standards for Inclusion in a Study:

- Individuals who are not currently under a doctor's care.
- Individuals free of any dermatological or systemic disorder which would interfere with the results, at the discretion of the Investigator.
- Individuals free of any acute or chronic disease that might interfere with or increase the risk of study participation.
- Individuals who will complete a preliminary medical history form mandated by AMA Laboratories, Inc. and are in general good health.
- Individuals, who will read, understand and sign an informed consent document relating to the specific type of study they are subscribing. Consent forms are kept on file and are available for examination on the premises of AMA Laboratories, Inc. only.
- Individuals able to cooperate with the Investigator and research staff, willing to have test materials applied according to the protocol, and complete the full course of the study.

4.2 Standards for Exclusion from a Study:

- Individuals under 18 years of age.
- Individuals who are currently under a doctor's care.
- Individuals who are currently taking any medication (topical or systemic) that may mask or interfere with the test results.
- Subjects with a history of any acute or chronic disease that might interfere with or increase the risk associated with study participation.
- Individuals diagnosed with chronic skin allergies.
- Female volunteers who indicate that they are pregnant or lactating.

4.3 Recruitment:

Panel selection is accomplished by advertisements in local periodicals, community bulletin boards, phone solicitation, electronic media or any combination thereof.

4.4 Informed Consent and Medical History Forms:

An informed consent was obtained from each volunteer prior to initiating the study describing reasons for the study, possible adverse effects, associated risks and potential benefits of the treatment and their limits of liability. Panelists signed and dated the informed consent document to indicate their authorization to proceed and acknowledge their understanding of the contents. Each subject was assigned a permanent identification number and completed an extensive medical history form. These forms along with the signed consent forms, are available for inspection on the premises of AMA Laboratories, Inc. only. Reference 21 CFR Ch. 1 Part 50, Subpart B.

The parties agree to comply with applicable state and federal privacy laws for the use and disclosure of a subject's personal health information by taking reasonable steps to protect the confidentiality of this information. This obligation shall survive the termination or expiration of this Agreement.

5.0 Population Demographics:

Number of subjects enrolled	51
Number of subjects completing study	50
Age Range	21-63
Sex.....	Male 10
	Female..... 41
Race	Caucasian 41
	Hispanic 9
	Asian..... 1

6.0 Equipment:

- Patch Description: Parke-Davis Hypoallergenic Readi Bandages or the equivalent.
- 1ml volumetric syringe without a needle.

7.0 Procedure:

- Subjects are requested to bathe or wash as usual before arrival at the facility.
- 0.2 ml or 0.2g of the well mixed test material is dispensed onto the occlusive, hypoallergenic patch.
- The patch is then applied directly to the skin of the infrascapular regions of the back, to the right or left of the midline and the subject is dismissed with instructions not to wet or expose the test area to direct sunlight.
- After 24 hours the patch is removed by the panelist at home.
- This procedure is repeated until a series of nine consecutive 24 hour exposures have been made for every Monday, Wednesday, and Friday for three consecutive weeks.
- In the event of an adverse reaction, the area of erythema and edema is measured. The edema is estimated by the evaluation of the skin with respect to the contour of the unaffected normal skin. Reactions are scored just before applications two through nine and the next test date following application nine. In most instances this is approximately 24 hours after patch removal. Clients are notified immediately in the case of adverse reaction and determination is made as to treatment program if necessary.
- Subjects are then given a 10 - 14 day rest period after which a challenge or retest dose is applied once to a previously unexposed test site. The retest dose is equivalent to any one of the original nine exposures. Reactions are scored 24 and 48 hours after application.
- Comparison is made between the nine inductive responses and the retest dose.

8.0 Results:

Please refer to attached Table.

9.0 Observations:

No adverse reactions of any kind were noted during the course of this study.

10.0 Archiving:

All original samples, raw data sheets, technician's notebooks, correspondence files and copies of final reports and remaining specimens are maintained on premises of AMA Laboratories, Inc. in limited access storage files marked "Archive". A duplicate disk copy of final reports is separately archived in a bank safe deposit vault.

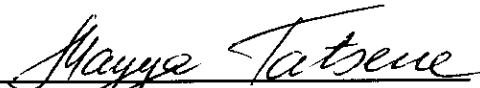
11.0 Reference:

Appraisal of the Safety of Chemicals in Food, Drugs and Cosmetics, published by The Association of Food and Drug Officials of The United States, 1965 (modified).

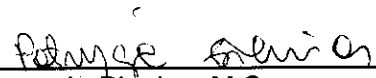
12.0 Conclusions:

The test material (AMA Lab. No.: L-3841; Client No.: EN081124-B) when tested under occlusion as described herein, may be considered:

a **NON-PRIMARY IRRITANT** and **NON-PRIMARY SENSITIZER** to the skin according to the reference.



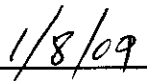
Mayya Tatsene, M.D.
Study Director



Patrycja Bienias, M.S.
Technician



David R. Winne, B.S.
Technical Director



Date

TABLE
SUMMARY OF RESULTS
(Occlusive Patch)

AMA Lab No.: L-3841
 Client No.: EN081124-B

No.	Subject ID	R A C E	S E X	Response									Chall.		Score
				1	2	3	4	5	6	7	8	9	24 HR	48 HR	
1	00 0002	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
2	28 0971	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
3	31 9721	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
4	34 7405	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
5	36 1827	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
6	36 9728	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
7	38 1226	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
8	38 4338	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
9	40 0533	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
10	40 1274	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
11	40 6489	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
12	42 8196	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
13	44 9258	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
14	46 2567	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
15	46 8520	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
16	48 1605	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
17	48 3275	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
18	48 3746	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
19	48 7214	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
20	50 1386	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
21	50 5772	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
22	52 6562	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
23	54 2951	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
24	54 4408	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
25	54 5333	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
26	56 5529	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
27	58 8637	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
28	60 1825	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
29	60 3008	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0

TABLE (CONT'D)
SUMMARY OF RESULTS
(Occlusive Patch)

AMA Lab No.: L-3841
 Client No.: EN081124-B

No.	Subject ID	R A C E	S E X	Response									Chall.		Score
				1	2	3	4	5	6	7	8	9	24 HR	48 HR	
30	60 3430	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
31	60 3986	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
32	60 7847	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
33	62 1313	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
34	62 3596	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
35	62 5537	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
36	64 0347	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
37	64 8003	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
38	66 8507	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
39	68 4139	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
40	68 7705	C	F	0	0	0	Dc	Dc	Dc	Dc	Dc	Dc	Dc	Dc	N/A
41	68 8917	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
42	70 2436	H	M	0	0	0	0	0	0	0	0	0	0	0	0.0
43	70 3392	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
44	72 2865	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
45	72 3637	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
46	72 7479	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
47	74 1746	C	M	0	0	0	0	0	0	0	0	0	0	0	0.0
48	76 7818	H	F	0	0	0	0	0	0	0	0	0	0	0	0.0
49	78 5826	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0
50	80 0282	A	F	0	0	0	0	0	0	0	0	0	0	0	0.0
51	80 4176	C	F	0	0	0	0	0	0	0	0	0	0	0	0.0

Evaluation Period:

This study was conducted from December 3, 2008
 through January 7, 2009.

Scoring Scale and Definition of Symbols Shown in Table:


- 0 - No evidence of any effect
- ? - (Barely perceptible) minimal faint (light pink) uniform or spotty erythema
- 1 - (Mild) pink uniform erythema covering most of contact site
- 2 - (Moderate) pink/red erythema visibly uniform in entire contact area
- 3 - (Marked) bright red erythema with accompanying edema, petechiae or papules
- 4 - (Severe) deep red erythema with vesiculation or weeping with or without edema
- D - Patch eliminated due to reaction
- Dc - Discontinued due to absence of subject on application date
- M - Patch applied to an adjacent site after strong test reaction
- N/A - Score is not calculated for subjects discontinued before challenge
- S - Skin stained from pigment in product
- T - Tan

NOTE: All technical employees of AMA LABORATORIES, INC. are required to take and pass a visual discrimination examination conducted by a Board Certified Ophthalmologist using the Farnsworth-Munsell 100 Hue Test as published; which determines a person's ability to discern color against a black background. This test was additionally modified to include a flesh tone background more nearly approaching actual use conditions, wherein erythematous skin is graded according to intensity.

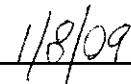
13.0 Quality Assurance Statement:

This study was inspected in accordance with the Standard Operating Procedures of AMA Laboratories, Inc. To assure compliance with the study protocol, the Quality Assurance Unit completed an audit of the study records and report.

Report reviewed by:



Kamil Wojtowicz, M.S.
Quality Assurance Supervisor



Date



Dermal and Ocular Irritation Tests

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Sample: ACB Bio-Chelate 5 PF

Code: 20339PF

CAS #: 7732-18-5 & 8013-01-2 & 8013-01-2 & 8013-01-2 & 8013-01-2 & 8013-01-2

Test Request Form/Submission #: 805

Lot #: 33446P

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

Study Director: Erica Segura

Principle Investigator: Meghan Darley

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 **ACB Bio-Chelate 5 PF** 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

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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.

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 Concepts, 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



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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 ≤ 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

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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.

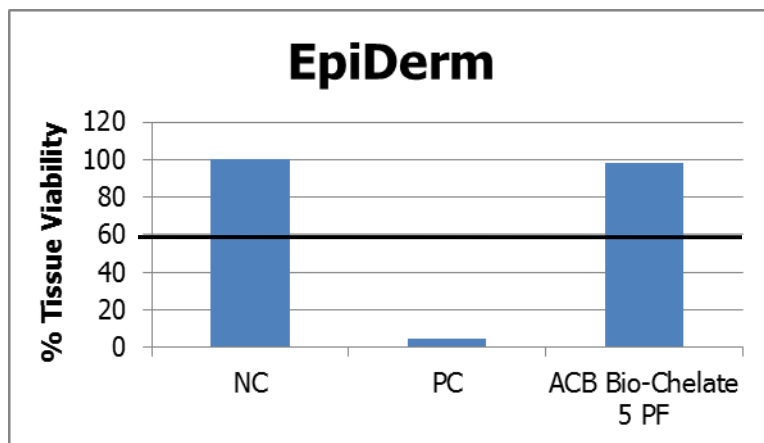


Figure 1: EpiDerm tissue viability

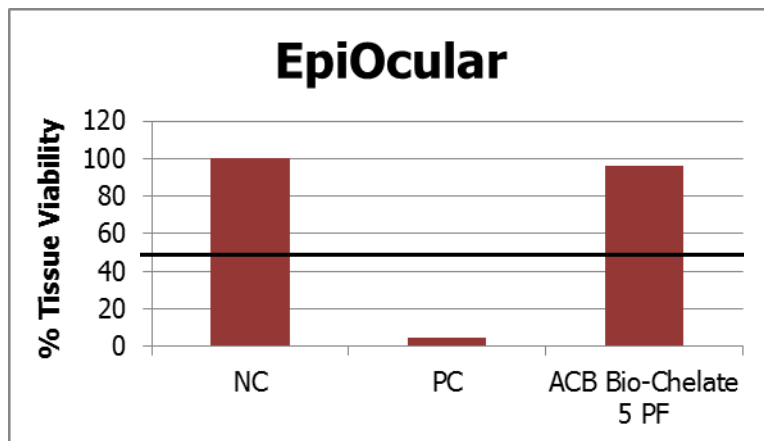


Figure 2: EpiOcular tissue viability

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