

BiEau® Actif Birch Toxicology Data

Code: 16907
INCI Name: Betula Alba Leaf Juice
CAS #: 84012-15-7
EINECS #: 281-660-9

Name of Study	Type of Study	Results
Dermal & Ocular Irritation Tests	<i>In-vitro</i>	Both the dermal and ocular assays reveal that BiEau® Actif Birch is non-irritating and should not cause any of the aforementioned conditions.
AMES Test	<i>In-vitro</i>	The results of the Bacterial Reverse Mutation Assay indicate that under the conditions of this assay, that BiEau® Actif Birch was considered to be Non-Mutagenic to Salmonella typhimurium tester strains TA98, TA100, TA1537, TA1535 and Escherichia coli WP2uvrA.
OECD TG 442D In-Vitro Skin Sensitization	<i>In-vitro</i>	The results using the ARE-Nrf2 Luciferase Test Method in accordance with UN GHS indicate that BiEau® Actif Birch was not predicted to be a skin sensitizer
OECD TG 442C Direct Peptide Reactivity	<i>In-chemico</i>	Based on HPLC-UV analysis BiEau® Actif Birch was determined as a non-sensitizer and will not cause allergic contact dermatitis.
OECD 301B Ready Biodegradability	<i>In-chemico</i>	The results of the Modified Sturm Test ensure BiEau® Actif Birch met method requirements for the Readily Biodegradable classification.

Name of Study	Type of Study	Results
OECD 201 Alga Growth Inhibition	<i>In-vivo</i>	According to the EU Directive 93/67/EEC, BiEau® Actif Birch is not classified as harmful to aquatic organisms
Phototoxicity Assay Analysis	<i>In-vitro</i>	The results of the assay indicate that that BiEau® Actif Birch is not a photoirritant when used at the suggested use levels of 1.0% -10.0%.



Dermal and Ocular Irritation Tests

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Tradename: BiEau® Actif Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5520

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

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 **BiEau™ Actif Birch** 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 **non-irritating**. 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-y)], 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-irritant**. The negative and positive controls performed as anticipated.



Dermal and Ocular Irritation Tests

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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.

II. Materials

- | | |
|----------------------------------|---|
| A. Incubation Conditions: | 37°C at 5% CO ₂ 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 H ₂ O |
| 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.



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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 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™).

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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 Figure 1. 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.

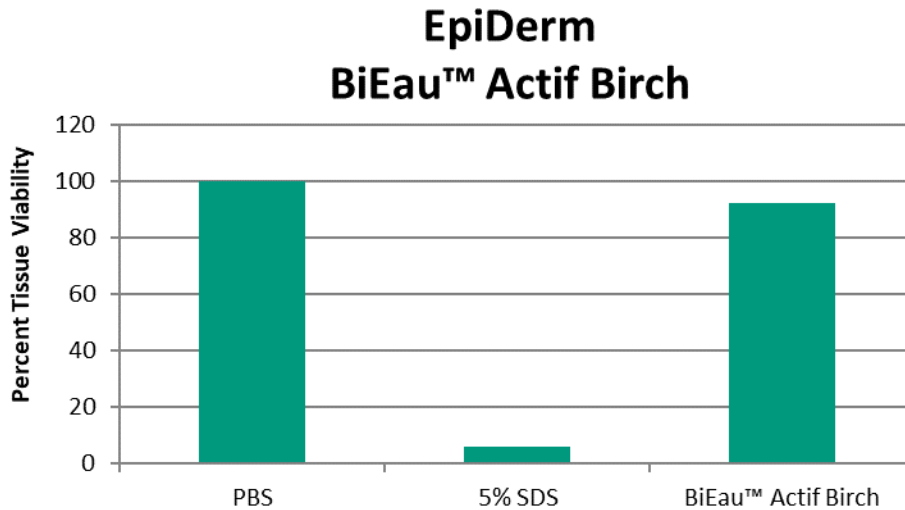


Figure 1: EpiDerm tissue viability

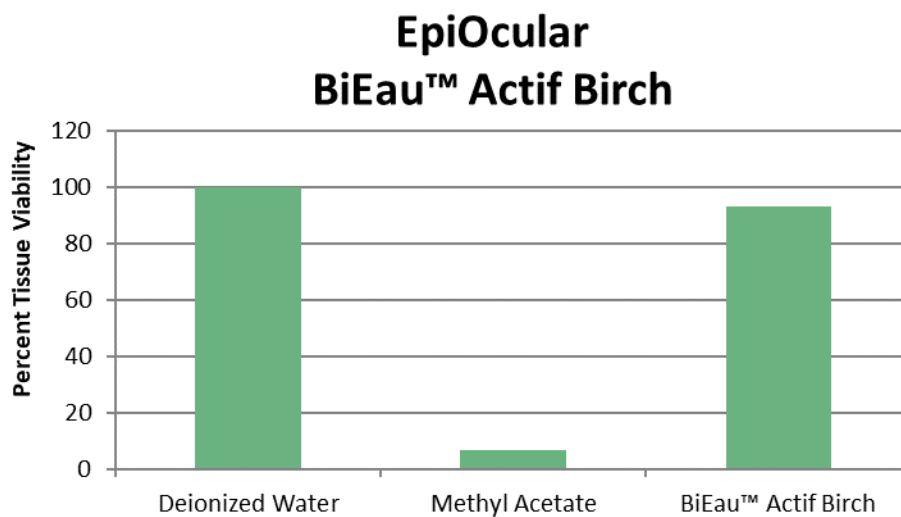


Figure 2: EpiOcular tissue viability



Bacterial Reverse Mutation Test

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Test Article: BiEau® Actif Birch

Code Number: 16907

CAS #: 84012-15-7

Sponsor:

Active Concepts, LLC

107 Technology Drive

Lincolnton, NC 28092

Study Director: Maureen Danaher

Principle Investigator: Monica Beltran

Test Performed:

Genotoxicity: Bacterial Reverse Mutation Test

Reference:

OECD471/ISO10993.Part 3

Test Request Number: 5553

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 **BiEau® Actif Birch** 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 Sport 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.

All *Salmonella* tester strain cultures demonstrated the presence of the deep rough mutation (*rfa*) and the deletion in the *uvrB* gene. Cultures of tester strains TA98 and TA100 demonstrated the presence of the Pkm101 plasmid R-factor. All WP2 *uvrA* cultures demonstrated the deletion in the *uvrA* gene. All cultures demonstrated the characteristic mean number of spontaneous revertants in the vehicle controls as follows: TA98, 10-50; TA100, 80-240; TA1535, 5-45; TA1537, 3-21, WP2uvrA, 10-60.

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Bacterial Reverse Mutation Test

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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 (WP2uvrA) 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>
WP2uvrA	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.

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C. Preparation of Tester strains

Cultures of *Salmonella typhimurium* TA98, TA100, TA1537, TA1535 and *Escherichia coli* WP2uvrA 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 µl of culture for each strain and 100 µl of testing solution or vehicle without test material. A 500 µl 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 µl 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. Criteria for a Valid Test

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 strains used.

All *Salmonella* tester strain cultures must demonstrate the presence of the deep rough mutation (*rfa*) and the deletion in the *uvrB* gene. Cultures of tester strains TA98 and TA100 must demonstrate the presence of the pKM101 plasmid R-factor. All WP2 *uvrA* cultures must demonstrate the deletion in the *uvrA* gene. All cultures must demonstrate the characteristic mean number of spontaneous revertants in the vehicle controls as follows: TA98, 10-50; TA100, 80-240; TA1535, 5-45; TA1537, 3-21, WP2uvrA, 10-60. To ensure that appropriate numbers of bacteria are plated, tester strain culture titers must be greater than or equal to 0.3×10^9 cells/ml.

The mean of each positive control must exhibit at least 3.0-fold increase in the number of revertants over the mean value of the respective vehicle control. A minimum of three non-toxic dose levels is required to evaluate assay data. A dose level is considered toxic if one of both of the following criteria are met: (1). A >50% reduction in the mean number of revertants per plate as compared to the mean vehicle control value. This reduction must be accompanied by an abrupt dose-dependent drop in the revertant count. (2). At least a moderate reduction in the background lawn.

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 µg per plate. The dose levels tested were 1.5, 5.0, 15, 50, 150, 500, 1500 and 5000 µg 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.

D. 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.

All *Salmonella* tester strain cultures demonstrated the presence of the deep rough mutation (*rfa*) and the deletion in the *uvrB* gene. Cultures of tester strains TA98 and TA100 demonstrated the presence of the Pkm101 plasmid R-factor. All WP2 *uvrA* cultures demonstrated the deletion in the *uvrA* gene. All cultures demonstrated the characteristic mean number of spontaneous revertants in the vehicle controls as follows: TA98, 10-50; TA100, 80-240; TA1535, 5-45; TA1537, 3-21, WP2uvrA, 10-60.

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	18	11	15
	1500	15	15	15
	500	21	24	23
	150	20	19	20
	50	18	17	18
	15	19	20	20
	5.0	16	18	17
	1.5	22	25	24
Test Solution w/o S9	5000	14	12	13
	1500	22	23	23
	500	16	18	17
	150	15	28	22
	50	26	28	27
	15	27	19	23
	5.0	22	21	22
	1.5	15	13	14
DI Water w/S9		17	10	14
DI Water w/o S9		58	52	55
2-aminoanthracen w/ S9		144	162	153
2-nitrofluorene w/o S9		120	148	134
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



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	Concentration µg per Plate	TA100		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	136	121	129
	1500	142	157	150
	500	111	121	116
	150	120	178	149
	50	136	145	141
	15	110	134	122
	5.0	133	118	126
	1.5	127	197	162
Test Solution w/o S9	5000	132	109	121
	1500	116	182	149
	500	115	110	113
	150	165	151	158
	50	129	131	130
	15	110	156	133
	5.0	128	131	130
	1.5	100	105	103
DI Water w/S9		116	120	118
DI Water w/o S9		107	117	112
2-aminoanthracen w/ S9		618	622	620
Sodium azide w/o S9		559	632	596
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		

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	Concentration µg per Plate	TA1537		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	15	16	16
	1500	13	12	13
	500	15	12	14
	150	12	14	13
	50	18	17	18
	15	14	14	14
	5.0	15	25	20
	1.5	17	21	19
Test Solution w/o S9	5000	19	21	20
	1500	16	28	22
	500	14	17	16
	150	15	16	16
	50	13	12	13
	15	11	19	15
	5.0	12	12	12
	1.5	16	20	18
DI Water w/S9		10	12	11
DI Water w/o S9		28	23	26
2-aminoanthracen w/ S9		390	375	383
2-aminoacridine w/o S9		116	122	119
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		

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*Mean = Average of duplicate plates

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	Concentration µg per Plate	TA1535		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	13	19	16
	1500	25	21	23
	500	33	32	33
	150	17	15	16
	50	20	23	22
	15	18	15	17
	5.0	13	11	12
	1.5	10	11	11
Test Solution w/o S9	5000	18	23	21
	1500	21	25	23
	500	18	27	23
	150	16	18	17
	50	18	18	18
	15	12	12	12
	5.0	22	23	23
	1.5	16	15	16
DI Water w/S9		17	21	19
DI Water w/o S9		16	27	22
2-aminoanthracen w/ S9		145	138	142
Sodium azide w/o S9		722	714	718
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		

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*Mean = Average of duplicate plates

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	Concentration µg per Plate	WP2uvrA		
		Revertants per plate (CFU)		Mean
Test Solution w/ S9	5000	19	25	22
	1500	18	21	20
	500	13	15	14
	150	21	20	21
	50	19	11	15
	15	15	18	17
	5.0	19	25	22
	1.5	24	24	24
Test Solution w/o S9	5000	26	20	23
	1500	21	32	27
	500	25	25	25
	150	28	21	25
	50	27	44	36
	15	13	14	14
	5.0	20	21	21
	1.5	13	13	13
DI Water w/S9		38	42	40
DI Water w/o S9		38	27	33
2-aminoanthracen w/ S9		188	161	175
Methylmethanesulfonate w/o S9		287	315	301
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

This information is presented in good faith but is not warranted as to accuracy of results. Also, freedom from patent infringement is not implied.
This information is offered solely for your investigation, verification, and consideration.



Tradename: BiEau Actif® Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5523

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

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 **BiEau Actif® Birch** 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

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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 **BiEau Actif® Birch** 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:

1. 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).
2. 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.
3. The average coefficient of variability of the luminescence reading for the negative (solvent) control DMSO should be below 20% in each experiment.

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 $\mu\text{g/ml}$ 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	I _{max}
Cinnamic aldehyde	Sensitizer	19	289.19 μM	32.08
DMSO	Non-Sensitizer	No Induction	243.24 μM	0.16
BiEau Actif® Birch	Non-Sensitizer	No Induction	> 1000 μM	0.33

Table 1: Overview of KeratinoSens® Assay Results (I_{max} equals the average induction values Fig.1)

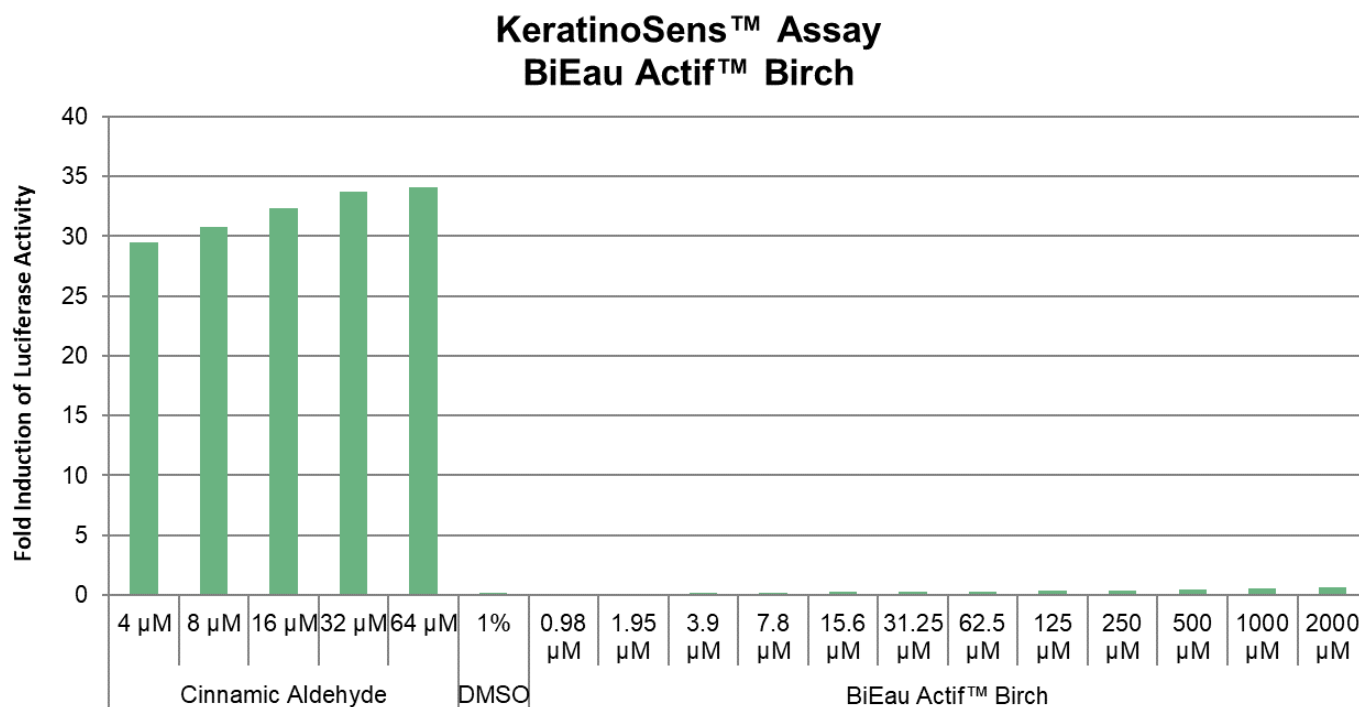


Figure 1: Fold Induction of Luciferase

Discussion

As shown in the results, **BiEau Actif® Birch (16907)** 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 **BiEau Actif® Birch** can be safely used in cosmetics and personal care products at typical use levels.



Tradename: BiEau® Actif Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5522

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

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 **BiEau® Actif Birch** 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* **BiEau® Actif Birch** in Acetonitrile

*For mixtures and multi-constituent substances of known composition such as **BiEau® Actif Birch**, a single purity should be determined by the sum of the proportion of its constituents (excluding water), and a single apparent molecular weight determined by considering the individual molecular weights of each component in the mixture (excluding water) and their individual proportions. The resulting purity and apparent molecular weight can then be used to calculate the weight of test chemical necessary to prepare a 100 mM solution.

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)

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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:

1. The following criteria must be met for a run to be considered valid:
 - a. Standard calibration curve should have an $r^2 > 0.99$.
 - b. 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.
 - c. 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%.
2. The following criteria must be met for a test chemical's results to be considered valid:
 - a. Maximum standard deviation should be <14.9 for percent cysteine depletion and <11.6 for percent lysine depletion.
 - b. Mean peptide concentration of the three reference control C should be 0.50 ± 0.05 mM.

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, than 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

Therefore the measured values of % depletion in the three separated runs for each peptide depletion assay include:

Cysteine 1:10/Lysine 1:50 Prediction Model		
Mean of Cysteine and Lysine % Depletion	Reactivity Class	Prediction
3.03	Minimal Reactivity	Non-sensitizer
3.05	Minimal Reactivity	Non-sensitizer
3.09	Minimal Reactivity	Non-sensitizer

Cysteine 1:10 Prediction Model		
Mean of Cysteine and Lysine % Depletion	Reactivity Class	Prediction
3.13	Minimal Reactivity	Non-sensitizer
3.09	Minimal Reactivity	Non-sensitizer
3.07	Minimal Reactivity	Non-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 **BiEau® Actif Birch (16907)** we can determine this product is not classified as a sensitizer and is not predicted to cause allergic contact dermatitis. The Mean Percent Depletion of Cysteine and Lysine was 3.08% causing minimal reactivity in the assay giving us the prediction of a non-sensitizer.



OECD 301B Ready Biodegradability Assay

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Tradename: BiEau® Actif Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5521

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed:

OECD 301 B

Ready Biodegradability: CO₂ Evolution (Modified Sturm Test)

Introduction

A study was conducted to assess the ready biodegradability of **BiEau® Actif Birch** 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

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- 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
- 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.



OECD 301B Ready Biodegradability Assay

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- 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)
- 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

- Data from the test should be entered onto the attached data sheet.
- 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.
- 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:

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

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.

- The percentage biodegradation is calculated from:

$$\% \text{ Degradation} = \frac{mg\ CO_2\ Produced}{ThCO_2 \times mg\ Test\ Substance\ Added} \times 100$$

Or

$$\% \text{ Degradation} = \frac{mg\ CO_2\ Produced}{mg\ TOC\ Added\ in\ Test \times 3.67} \times 100$$

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

- 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:

$$\% ThCO_2 = \frac{mg\ IC\ from\ Test\ Flask - mg\ IC\ from\ Blank}{mg\ TOC\ Added\ as\ Test\ Substances} \times 100$$

- 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.
- When appropriate, calculate DOC removals using the equation given in 301 A paragraph 27.
- When an abiotic control is used, calculate the percentage abiotic degradation by:

$$\% \text{ Abiotic Degradation} = \frac{CO_2\ Produced\ by\ Sterile\ Flask\ After\ 28\ Days\ (mg)}{ThCO_2\ (mg)} \times 100$$



OECD 301B Ready Biodegradability Assay

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Validity of Tests

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	07/22/2019		
Test Substance	Name	BiEau® Actif Birch	
	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	95.5% and 95.9% 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, **BiEau® Actif Birch** achieved 95.7% biodegradation after 28 days of testing. The product met method requirements for the Readily Biodegradable classification.

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OECD 201 Freshwater Alga Growth Inhibition Test

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Tradename: BiEau® Actif Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5525

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed:

OECD 201

Freshwater Alga Growth Inhibition Test

Introduction

The purpose of the present study is to determine the toxicity of **BiEau® Actif Birch** by exposing the exponentially growing test organism *Pseudokirchneriella subcapitata* to the test substance for 72 hours and measuring the growth and growth inhibition through cell counting against the control. The response is evaluated as a function of the exposure concentration in comparison with the average growth of replicate, unexposed control cultures.

OECD Guideline 201 on "Fresh Alga and Cyanobacteria, Growth Inhibition Test", adopted in 1984, extended the guideline to include additional species and update it to meet the requirements for hazard assessment and classification of chemicals in 2006.

Assay Principle

Pseudokirchneriella subcapitata, are exposed to the test substance at a range of concentrations for a period of 72 hours. The cultures are allowed unrestricted exponential growth under nutrient sufficient conditions and continuous light for a sufficient period of time to measure reduction of the specific growth rate. Growth and growth inhibition are quantified from measurements of the algal biomass as a function of time. The test endpoint is inhibition of growth, expressed as the logarithmic increase in biomass during the 72 hour exposure period. The results are analyzed in order to calculate the EC₁₀ and EC₂₀ at 72 hours. The response is evaluated as a function of the exposure concentration in comparison with the average growth of replicate, unexposed control cultures.

A reliable analytical method for the quantification of the substance in the test solutions with reported recovery efficiency and limit of determination should be available. A reference substance may be tested for EC₅₀ as a means of assuring that the test conditions are reliable.

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OECD 201 Freshwater Alga Growth Inhibition Test

Analysis of the concentration of the test substance at the start and end of the test of a low and high test concentration around the expected EC₅₀ may be sufficient where it is likely that exposures concentrations will vary less than 20% from the nominal values during the test.

Materials

- Glass Flasks with air-permeable stopper
- Automated Pipette
- pH Meter
- Temperature Control Apparatus
- Microscope with counting chamber
- *Pseudokirchneriella subcapitata* (ATCC 22662)
- Gorham's medium for algae (ATCC MD-0625)

Methods

Test Conditions

- Inoculum Culture
 - Inoculum culture is incubated under the same conditions as the test cultures for 2-4 days allowing for exponential growth to prevail before the start of the test. This is done to ensure that growth is within the normal range for the test strain under the culturing conditions.
- Initial Biomass
 - The initial biomass in the test cultures must be the same in all test cultures and sufficiently low to allow exponential growth throughout the incubation period without risk of nutrient depletion. The initial biomass should not exceed 0.5 mg/L as dry weight.
- Exposure Period
 - 72 hours
- Number of Test Organisms
 - *Pseudokirchneriella subcapitata* $5 \times 10^{3-4}$ cells/ml
- Test Concentration
 - Adopt a concentration range of at least 5 concentrations, causing a range of 5-75% inhibition of algal growth rate expressed as E_rC_x
- Culture Method
 - Illumination: Continuous uniform fluorescent illumination
 - Temperature: The temperature is between 21°C to 24°C
 - pH: pH of the control medium should not increase be more than 1.5 units during test

Measurement of Test Substance Concentrations

- Measurement of biomass is done by manual cell counting by microscope.
- Algal biomass in each flask is determined daily during test period.
- 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.

OECD 201 Freshwater Alga Growth Inhibition Test

Observation

- Microscopic observation should be performed to verify a normal and healthy appearance of the inoculum culture and to observe any abnormal appearance of the algae at the end of the test.

Test Condition Measurements

- 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. Tabulate the estimated biomass concentration in test cultures and controls together with the concentrations of test materials and the times of measurement, recorded with a resolution of at least whole hours, to produce plots of growth curves.
- b. For each response variable to be analyzed, use the concentration-response relationship to calculate point estimates of EC_x values. Recent scientific developments have led to a recommendation of abandoning the concept of NOEC and replacing it with regression based point estimates EC_x , specifically EC_{10} and EC_{20} .

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 *Pseudokirchneriella subcapitata*, 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, density of *Pseudokirchneriella subcapitata* 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, 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 and pH made during the test
 3. The EC_{10} and EC_{20} at 72 hours for percent inhibition 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_{10} and EC_{20} .

OECD 201 Freshwater Alga Growth Inhibition Test

$$\text{Percent (\%) Inhibition} = \frac{\mu_c - \mu_T}{\mu_c} \times 100$$

μ_c : mean value for average specific growth rate (μ) in the control group

μ_T : average specific growth rate for the treatment replicate

Results

General Information:

Name of new chemical substance	BiEau® Actif Birch		
INCI Nomenclature	Betula Alba Juice		
CAS number	84012-15-7		
Formulation Method	Extraction		
Molecular weight	285 Da		
Purity of the new chemical substance used for the test (%)	100%		
Lot number of the new chemical substance used for the test	N190402I		
Names and contents of impurities	N/A		
Solubility in water	Soluble		
Properties at room temperature	Clear to Hazy Pale Yellow to Amber Liquid, Characteristic Odor		
Stability	Stable Under Normal Conditions		
Solubility in solvents, etc.	Solvent	Solubility	Stability in solvent
	N/A	N/A	N/A

Test Materials and Methods:

Items		Contents
Test Organisms	Species	<i>Pseudokirchneriella subcapitata</i>
	Source	ATCC
	Reference substance (EC ₅₀)	3,5-dichlorophenol
Culture	Kind of Medium	Gorham's Medium for Algae
	Conditions (Temperature)	22°C ± 2°C
Test Conditions	Test Vessel	Glass
	Material Water	Kind
		Deionized
		Hardness
		250 mg/L
		pH
		7.4
	Date of Exposure	07/22/2019
	Test Concentrations	200, 89.4, 42.3, 19.2, 7.8 mg/L
	Number of organisms	5 x 10 ³ -4 cells/ml
	Number of Replicates	Exposure Group
		4
	Control Group	4
		4
	Test Solution Volume	5 mL
	Vehicle	Use or Not
		N/A
		Kind
		N/A
	Concentration	N/A
		N/A
	Number of Replicates	N/A
		N/A
	Photoperiod	Continuous

Test Results:

Items		Contents
Toxicity Value	Percent Inhibition EC ₁₀ and EC ₂₀	105.63 mg/L and 186.49 mg/L
Exposure Concentrations Used for Calculation	Nominal Values	200, 89.4, 42.3, 19.2, 7.8 mg/L
Remarks		Not harmful to aquatic organisms

Discussion

After 72 hours, the percent inhibition for **BiEau® Actif Birch** was determined to be 105.63 mg/L EC₁₀ and 186.49 mg/L EC₂₀. The conditions of OECD guideline 201 for the validity of the test were adhered to, this product is not classified and therefore not harmful to aquatic organisms.



Phototoxicity Assay Analysis

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Tradename: BiEau® Actif Birch

Code: 16907

CAS #: 84012-15-7

Test Request Form #: 5524

Lot #: N190402I

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

Study Director: Maureen Danaher

Principle Investigator: Jennifer Goodman

Test Performed:

In Vitro EpiDerm® Model (EPI-200-SIT) Phototoxicity

SUMMARY

In vitro phototoxicity irritation studies were conducted to evaluate whether **BiEau™ Actif Birch** would induce phototoxic irritation in the EpiDerm® model assay.

The product was tested according to the manufacturer's protocol. The test article solution was found to be a non-photoirritant at concentrations of 0.5%, 1.5%, 5.0% and 10.0%. Reconstructed human epidermis was incubated in growth media for one hour to allow for tissue equilibration after shipping from MatTek Corporation, Ashland, MA. Test substance was applied to the tissue inserts in four varying concentrations and incubated overnight at 37°C, 5% CO₂, and 95% relative humidity (RH). The following day, the appropriate tissue inserts were irradiated (UVA) for 60 minutes with 1.7 mW/cm² (=6 J/cm²). After substance incubation, irradiation, and washing was completed, the cell viability test was conducted. Cell viability was measured by dehydrogenase conversion of MTT [(3-4,5-dimethyl thiazole 2-yl)], present in the cell mitochondria, into blue formazan salt that was measured after extraction from the tissue. The photoirritation potential of the test chemical was dictated by the reduction in tissue viability of UVA exposed tissues compared to non-UVA exposed tissues.

Under the conditions of this assay, the test article was considered to be non-phototoxic at concentrations of 0.5%, 1.5%, 5.0%, and 10.0%. The negative and positive controls performed as anticipated.

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Phototoxicity Assay Analysis

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I. Introduction

A. Purpose

In vitro dermal phototoxicity study was conducted to evaluate whether a test article would induce photoirritation in the EpiDerm® model assay. MatTek Corporation's reconstructed human epidermal model is becoming a standard in determining the phototoxicity potential of a test substance. This assay is able to discriminate between photoirritants and non-photoirritants at varying concentrations.

II. Materials

- | | |
|----------------------------------|---|
| A. Incubation Conditions: | 37°C at 5% CO ₂ and 95% relative humidity |
| B. Equipment: | Forma humidified incubator, ESCO biosafety laminar flow hood, Synergy HT Microplate reader; UVA-vis Irradiation Equipment; UVA meter; Pipettes |
| C. Media/Buffers: | Dulbecco's Modified Eagle Medium (DMEM) based medium; Dulbecco's Phosphate-Buffered Saline (DPBS); sterile deionized H ₂ O |
| 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, and 6-well tissue culture plates |
| F. Reagents: | MTT (3-4,5-dimethyl thiazole 2-yl) (1.0mg/mL); Extraction Solution (Isopropanol); Chlorpromazine; Triton X-100 (1%) |
| G. Other: | Wash bottle; sterile disposable pipette tips; Parafilm; forceps |

III. Test Assay

A. Test System

The reconstructed human epidermal model, EpiDerm® consists of normal human-derived epidermal keratinocytes which have been cultured to form a multilayer, highly differentiated model of the human epidermis. This model consists of organized basal, spinous, and granular layers, and contains a multilayer stratum corneum containing intercellular lamellar lipid layers. The EpiDerm® tissues are cultured on specially prepared cell culture inserts.

B. Negative Control

Sterile deionized water is used as the negative controls for the EpiDerm™ Phototoxicity assay.

C. Positive Control

Concentrations of chlorpromazine, ranging from 0.001% to 0.1%, were used as positive controls for the EpiDerm® Phototoxicity assay.

D. Data Interpretation Procedure

A photoirritant is predicted if the mean relative tissue viability of the 2 tissues exposed to the test substance and 60 minutes of 6 J/cm² is reduced by 20% compared to the non-irradiated control tissues.

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Phototoxicity Assay Analysis

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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 60 minutes. After those 60 minutes the inserts are transferred into fresh media and tissue culture plates and tissue insert dosing begins.

B. Test Substance Exposure

50µL of the diluted test substance in their respective concentrations are applied to 2 tissue inserts and allowed to incubate for overnight in a humidified incubator (37°C, 5% CO₂, 95% RH).

C. Tissue Irradiation

Tissue inserts in their 6-well plates are UVA-irradiated for 60 minutes with 6 J/cm² at room temperature. The non-irradiated tissue inserts are incubated at room temperature in the dark.

D. Tissue Washing and Post Incubation

After UVA-irradiation and dark incubation is complete the tissue inserts are washed using sterile DPBS and transferred to fresh 6-well plates and media for overnight incubation at 37°C, 5% CO₂, 95% RH.

E. 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 ≥ 0.8.

B. Positive Control

The assay meets the acceptance criterion if a dose dependent reduction in cell viability in the UVA-irradiated tissues is between 0.00316% and 0.0316%.

C. Standard Deviation

Since the phototoxicity potential is predicted from the mean viability of 2 tissues for the EpiDerm® Phototoxicity Protocol, the variability of the replicates should not exceed 30%.

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VI. Results

A. Tissue Characteristics

The tissue inserts included in the MatTek EpiDerm® assay kit were in good condition, intact, and viable.

B. Tissue Viability Assay

The results are summarized in Figure 1. Cell viability is calculated for each tissue as a percentage of the corresponding vehicle control either irradiated or non-irradiated. Tissue viability was not reduced by 20% in the presence of the test substance and UVA-irradiation at concentrations of 0.5%, 1.5%, and 5.0%. The negative control mean exhibited acceptable relative tissue viability while the positive control exhibited dose dependent loss of tissue viability and cell death.

C. Test Validity

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

VII. Conclusion

Phototoxicity (photoirritation) is defined as an acute toxic response that is elicited after exposure of the skin to certain chemicals and subsequent exposure to light. Under the conditions of this assay, the test article substance was considered to be non-phototoxic at concentrations of 0.5%, 1.5%, 5.0%, and 10.0%. The negative and positive controls performed as anticipated.

There is a slight decrease in viability at the 10% concentration but viability does not decrease more than the acceptable 20%. We can safely say that **BiEau® Actif Birch** is not a photoirritant when used at the suggested use levels of 1.0% -10.0%.

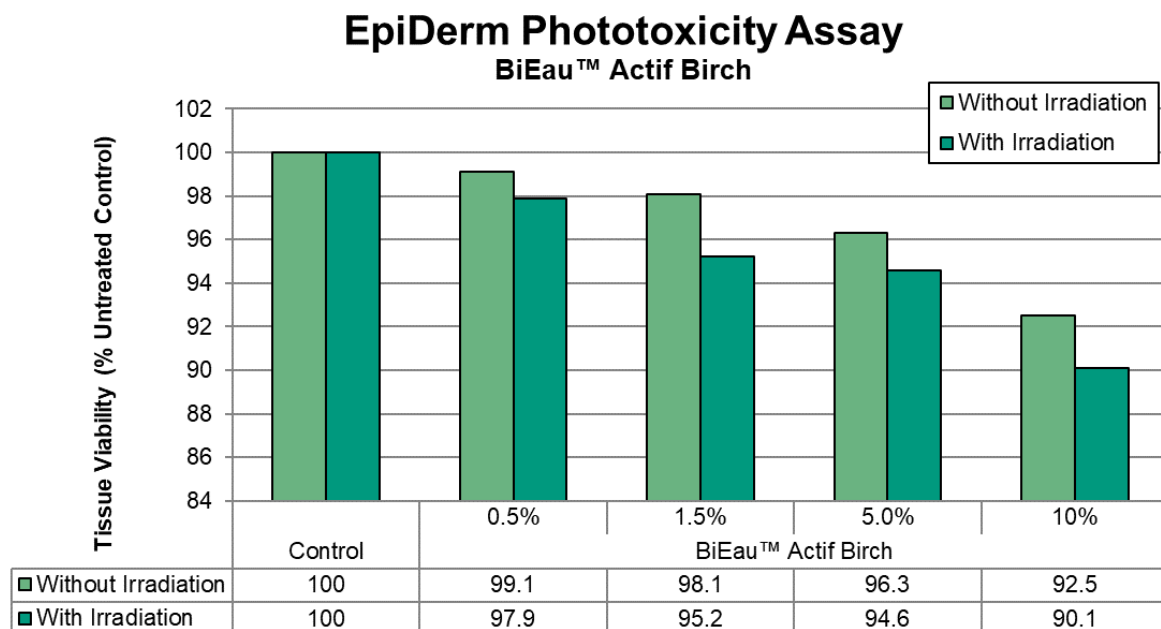


Figure 1: EpiDerm Phototoxicity Graph