



COSMETIC PRODUCT SAFETY ASSESSMENT

VOLCANIC CLAY SOAP

This report prepared based on the
Regulation (EC)No.1223/2009 and the
SCCS's Notes Of Guidance For The
Testing of Cosmetic Ingredients And Their
Safety Evaluation 9th Revision 2015

COSMETIC PRODUCT SAFETY ASSESSMENT
According to (EC) No 1223/2009 Cosmetic Regulation

Version: 1.0
Prep. Date: 28.05.2022

Form No: 102071
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A. COSMETIC PRODUCT SAFETY INFORMATION

1.

Information on Product Identity:

Product Name : VOLCANIC CLAY SOAP
IntendedUse : Skin Care Product/ Soap / Rinse-off Product
Manufacturer : Fratello Kuyumculuk Hediyeelik Eşya Ve Temizlik Ürünleri
Sanayi Dış Ticaret Limited Şirketi
Adress : Maltepe Mah. Maltepe Cad. No:15 Zeytinburnu/İstanbul
Telephone : +905367126565

Qualitative and Quantitative Composition of the Cosmetic Product

INCI NAME	EINECS/ ELINCS NO	CAS NO	MAX. CONCENTRATION (%)	FUNCTION
OLEA EUROPAEA FRUIT OIL	232-277-0	8001-25-0	50,0	FRAGRANCE PERFUMING SKIN CONDITIONING
AQUA	231-791-2	7732-18-5	25,0	SOLVENT
COCOS NUCIFERA OIL	232-282-8	8001-31-8	15,0	FRAGRANCE HAIR CONDITIONING PERFUMING SKIN CONDITIONING
RICINUS COMMUNIS SEED OIL	232-293-8	8001-79-4	15,0	FRAGRANCE PERFUMING SKIN CONDITIONING
SODIUM HYDROXIDE*	215-185-5	1310-73-2	10,0	BUFFERING DENATURANT
BENTONITE	1302-78-9	215-108-5	5,0	ABSORBENT BULKING EMULSION STABILISING VISCOSITY CONTROLLING
JUGLANS REGIA SEED OIL	232-282-8	8001-31-8	5,0	SKIN CONDITIONING
PARFUME			2,0	FRAGRANCE

***SODIUM HYDROXIDE** is allowed in cosmetic products under the following conditions set in Annex III (15a) of Regulation (EC) No 1223/2009:

Annex III: List of substances which cosmetic products must not contain except subject to the restrictions laid down

1.2. Control of Substances Compliance with Regulation

List of Substances which cosmetic products must not contain except subject to the restriction slaid down Cosmetic Regulation (EC) No 1223/2009

2. Physical/Chemical Characteristics and Stability of the Cosmetic Product

2.1. Physical / Chemical Characteristics

The cosmetic product „bentoite“ soap has the following physical/chemical characteristics:

Parameter		Specifications	Result
Organoleptic Characteristics	Appearance	SOLID SOAP	APPROVED
	Color	CHARACTERISTIC	APPROVED
	Odor	CHARACTERISTIC	CHARACTERISTIC
Physicochemical Characteristic	pH	10 – 10,5	APPROVED

The stability of the product has been tested at 5°C, 25°C and 40°C for 3 months and in the original package of the product.

During this period, appearance, color, odor, pH and other parameters were tested.

It was stated that during the stability tests, no deviation/separation from the original condition of the product was observed.

The results obtained from the stability test are considered to be acceptable.

The durability period of the product after opening is stated on the label as 12 months.

The protocol with results of stability testing is attached in **Annex**.

3. Microbiological Quality

Staphylococcus aureus, *Pseudomonas aeruginosa*, and *Candida albicans* and *Escherichia coli* are the microorganisms that should not be present in cosmetic products. Since different skin areas may have different sensitivity, two different categories have been defined for cosmetic products;

Category 1 Products for children under 3 years of age, products applied to the eye area, products applied to mucosmembranes, products not rinsed

Category 2 Other products, rinsed products
 Category 1: Total number of live aerobic mesophilic microorganisms (bacteria, yeast and mold) should not exceed 10^2 cfu/g or 10^2 cfu / ml. *Staphylococcus aureus*, *Pseudomonas aeruginosa*, *Candida albicans* or *Escherichia coli* should not be present.

Category 2: The total number of live Aerobic mesophilic microorganisms must not exceed 10^3 cfu / g or 10^3 cfu / ml. *Staphylococcus aureus*, *Pseudomonas aeruginosa*, and *Candida albicans* and *Escherichia coli* should not be present.

Below is the result of microbiological analysis for the final product.

Parameters	Specification	Results	Method
*Aerobic mesophilic microorganisms	<1000	<10	TS EN ISO 21149
* <i>Pseudomonas aeruginosa</i>	Should not be	0	TS EN ISO 22717
* <i>Candida albicans</i>	Should not be	0	TS EN ISO 18416
* <i>Staphylococcus aureus</i>	Should not be	0	TS EN ISO 22718
<i>E.coli</i>	Should not be	0	TS EN ISO 21150
Yeast and Mould	<1000	<10	TS EN ISO 16212

Result obtained on different batches comply with SCCS requirements, therefore there is no risk of microbial contamination.

The protocol with results of microbiological testing is attached in **Annex**.

Challenge Test ; ISO 11930

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The test involves preparing appropriate microorganisms at certain inoculum levels and counting the microorganisms in the sample by sowing from the sample containing the microorganism at specific time intervals . It is judged whether the protective property of the product is sufficient by observing whether a significant decrease or increase of the microorganisms in the test conditions on days 7, 14 and 28 is observed appropriately The protocol with results of **Challenge** testing is attached in **Annex**.

4. Impurities, Traces, Informations about the Packaging Material

VOLCANIC CLAY SOAP is presented to the consumer in 135 g packaging. The product was analyzed according to the packaging standards. Raw material specifications are available upon request. It consists of suitable cosmetic quality components, which are the packaging materials of the product. There is no negative result with regard to any interaction or deterioration of the packaging material with the product.

5. Normal and Reasonably Foreseeable Use

Warnings on the product label:
Avoid contact with eyes and mouth. In case of contact, rinse thoroughly with plenty of water.

Application of the Product:
Before use, read the instructions of your product at sopna.co, you can access the site with QR code. Keep in a dry place

6. Exposure to the Cosmetic Product

Product type: Leave-on product
The sites of application: Area body
The surface areas of application (cm²): 17500
Estimated amount of product applied (g): 18,67g
The duration and frequency of use: 1,43/day
Retention factor: 0,01
The normal and reasonably foreseeable exposure route: Dermal
Exposed population: Adults
A = 2,79 mg/kg bw /day
(The SCCS's Notes Of Guidance For The Testing Of Cosmetic Ingredients And Their Safety Evaluation 9th Revision 2015)

7. Exposure to the Substances

Dermal absorption reported as a percentage of the amount of substances applied:

$$SED = A \text{ (mg/kg bw/day)} \times C(\%)/100 \times DAp (\%)/100$$

SED A (mg/kg bw/day) : Systemic exposure dosage
A (mg/kg bw/day): Estimated daily exposure to a cosmetic product per kg body weight, based upon the amount applied and the frequency of application

C (%): The concentration of the ingredient under study in the finished cosmetic product on the application site.

DAP (%): Dermal Absorption expressed as a percentage of the test dose assumed to be applied in real-life conditions

A = 2,79mg/kg bw/day. An adult's body weight was accepted 60 kg(Base on The SCCS's Notes Of Guidance For The Testing Of Cosmetic Ingredients And Their Safety Evaluation 9th Revision, 2015.)

Hamaddenin INCI Adı	OLEA EUROPAEA FRUIT OIL
Konsantrasyon C	% 50
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

$$SED = A \text{ (mg/kg vücut ağırlığı/gün)} \times C \text{ (\%)} / 100 \times DAP \text{ (\%)} / 100$$

$$SED = 2.79 \text{ (mg/kg vücut ağırlığı/gün)} \times 50 \text{ (\%)} / 100 \times 100 \text{ (\%)} / 100$$

$$SED = 1.395 \text{ (mg/kg vücut ağırlığı/gün)}$$

Hamaddenin INCI Adı	COCOS NUCIFERA OIL
Konsantrasyon C	%15
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

$$SED = A \text{ (mg/kg vücut ağırlığı/gün)} \times C \text{ (\%)} / 100 \times DAP \text{ (\%)} / 100$$

$$SED = 2,79 \text{ (mg/kg vücut ağırlığı/gün)} \times 15 \text{ (\%)} / 100 \times 100 \text{ (\%)} / 100$$

$$SED = 0,6975 \text{ (mg/kg vücut ağırlığı/gün)}$$

Hamaddenin INCI Adı	RICINUS COMMUNIS SEED OIL
Konsantrasyon C	%15
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

$$SED = A \text{ (mg/kg vücut ağırlığı/gün)} \times C \text{ (\%)} / 100 \times DAP \text{ (\%)} / 100$$

$$SED = 2,79 \text{ (mg/kg vücut ağırlığı/gün)} \times 15 \text{ (\%)} / 100 \times 100 \text{ (\%)} / 100$$

$$SED = 0,6975 \text{ (mg/kg vücut ağırlığı/gün)}$$

Hamaddenin INCI Adı	BENTONITE
Konsantrasyon C	%5
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

$$SED = A \text{ (mg/kg vücut ağırlığı/gün)} \times C \text{ (\%)} / 100 \times DAP \text{ (\%)} / 100$$

$$SED = 2,79 \text{ (mg/kg vücut ağırlığı/gün)} \times 5 \text{ (\%)} / 100 \times 100 \text{ (\%)} / 100$$

$$SED = 0,1395 \text{ (mg/kg vücut ağırlığı/gün)}$$

Hamaddenin INCI Adı	JUGLANS REGIA SEED OIL
Konsantrasyon C	%5
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

$$SED = A \text{ (mg/kg vücut ağırlığı/gün)} \times C \text{ (\%)} / 100 \times DAP \text{ (\%)} / 100$$

$$SED = 2,79 \text{ (mg/kg vücut ağırlığı/gün)} \times 5 \text{ (\%)} / 100 \times 100 \text{ (\%)} / 100$$

$$SED = 0,1395 \text{ (mg/kg vücut ağırlığı/gün)}$$

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Hamaddenin INCI Adı	PARFUME
Konsantrasyon C	%2
A (mg/kg vücut ağırlığı/gün)	2.79
Dermal Absorbsiyon DAp (%)	% 100

SED = A (mg/kg vücut ağırlığı/gün) X C (%) / 100 X DAp (%) / 100
SED = 2,79 (mg/kg vücut ağırlığı/gün) X 2 (%) / 100 X 100 (%) / 100
SED = 0,0558 (mg/kg vücut ağırlığı/gün)

INCI NAME	CONCENTRATION (%)	RETANTION FACTOR (R)	DERMAL ABSORPTION DAp (%)	SED (mg/kg bw/day)
OLEA EUROPAEA FRUIT OIL	50,0	0,01	100	1,395
AQUA	25,0	0,01	100	0,6975
COCOS NUCIFERA OIL	15,0	0,01	100	0,4185
RICINUS COMMUNIS SEED OIL	15,0	0,01	100	0,4185
SODIUM HYDROXIDE*	-	-	-	-
BENTONITE	5,0	0,01	100	0,1395
JUGLANS REGIA SEED OIL	5,0	0,01	100	0,1395
PARFUME	2,0	0,01	100	0,0558

*There is no calculation for **SODIUM HYDROXIDE** as this ingredient is not contained in the final product.

8. Toxicological Profile of the Substances Involved in the Formula

8.1. Calculation of Margin of Safety (Mos)

The product itself has not been subjected to animal experiments. Information about raw materials has been benefited from previous studies.

$$\text{MoS} = \frac{\text{NO(A)EL}}{\text{SED}} \geq 100$$

MoS: Margin of safety of an ingredient

NO(A)EL: The highest exposure of a chemical, determined in toxicity tests etc., having no adverse effect (e.g. onset of sickness) even when the chemical is taken (exposed) daily for the rest of one's life. In practice, mice, rats or other animals are forced to take a chemical for a certain period of time. Usually NOAEL is expressed in the amount of a chemical taken daily per kg body weight (e.g., mg/kg/day). Safety limit of raw materials with NOAEL value is calculated and stated in the table below

INCI Name	SED (mg/kg/bw/day)	NO(A)EL (mg/kg vücutağırlığı/gün)	MoS (NOAEL/SED)	Reference
OLEA EUROPAEA FRUIT OIL	1,395	N/A	N/A	according to CIR Expert Panel (2011), for more information see the toxicological profile of OLEA EUROPAEA FRUIT OIL; https://www.cir-safety.org/sites/default/files/118_final_oils_web.pdf
AQUA	0,6975	-	-	-
COCOS NUCIFERA OIL	0,4185	No adverse effects were noted in either test group during the test period. The authors concluded that Coconut Oil was as effective and safe as mineral oil when used as a moisturizer.	N/A	https://www.cir-safety.org/sites/default/files/115_buff3e_suppl.pdf
RICINUS COMMUNIS SEED OIL	0,4185	N/A	N/A	The very limited data on acute toxicity in target animals comprise mainly information on castor bean products rather than on purified ricin. Amongst ruminants, cattle appear to tolerate higher intakes than sheep. In horses severe colic and death have been observed after a single dose of approximately 7-8 mg ricin/kg b.w. Toxic effects in pigs and birds have been reported as well as accidental poisonings in dogs with vomiting, depression and diarrhoea as the main clinical signs. No- or lowest observed adverse effect levels (NOAELs or LOAELs) for acute effects of ricin could not be identified for any of the animal species. https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2008.726
SODIUM HYDROXIDE	-	2000	-	https://www.esr.cri.nz/assets/HEALTH-CONTENT/MoH-reports/FW14001-Bleach-risk-assessment-final.pdf

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BENTONITE	0,1395	N/A	N/A	https://pubmed.ncbi.nlm.nih.gov/12851164/
JUGLANS REGIA SEED OIL	0,1395	3400 mg/kg/day	8124,253286	No Observable Adverse Effect Level (NOAEL) higher than 3400 mg/kg/day in Wistar rats, that corresponds to more than 550 mg/kg/day human intake [178]. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6266065/
PARFUME	0,0558	N/A	N/A	

- MoS calculation for
JUGLANS REGIA SEED OIL:

NOAEL: 3400 mg/kg bw/day

SED: 0,1395 mg/kg bw/day

MoS=NOAEL/SED

MoS = 3400 / 0,1395

MoS = 8124,25

MoS > 100

8.2. Toxicological Assessment of the Substances Involved in the Formula

Raw materials and mixtures involved in the formula has been evaluated by classifying according to their trade names:

ROSE DAMASCENA FLOWER WATER

Acute toxicity via Oral route:

Based on the available information, the registered substance is:- not classified according to the Regulation (EC) No. 1272/2008 and GHS.

Acute toxicity via Dermal route:This information is not available

Acute toxicity via Inhalation:This information is not available.

Specific target organ toxicity: single exposure (Oral):

The classification criteria according to the Annex VI of the Regulation (EC) No. 1272/2008 as specific target organ toxicant (STOT) – single exposure, oral are not met since no reversible or irreversible adverse health effects were observed immediately or delayed after exposure and no effects were observed at the guidance value (oral) for a Category 1 classification ($C \leq 300$ mg/kg bw) and at the guidance value (oral) for a Category 2 classification (2000 mg/kg bw $\geq C > 300$ mg/kg bw). No classification is required.

Specific target organ toxicity: single exposure (Dermal): This information is not available

Specific target organ toxicity: single exposure (Inhalation): This information is not available.

Based on its composition and its physical state (viscous liquid), the registered substance is not classified for aspiration hazard according to CLP Regulation and GHS.

<https://echa.europa.eu/registration-dossier/-/registered-dossier/22618/7/3/1>

Olea Europaea (Olive) Fruit Oil

1.6% Olea Europaea (Olive) Fruit Oil in a body lotion	HRIPT with 0.02 ml test material, occluded	1 subject had slight erythema following the 7th patch that did not reoccur, no other reactions observed. Not a dermal irritant or sensitizer
22% Olea Europaea (Olive) Fruit Oil in a body moisturizer	HRIPT, semi-occluded	Not a dermal irritant or sensitizer
58.7% Olea Europaea (Olive) Fruit Oil in a conditioning not a dermal irritant or sensitizer	HRIPT with 0.2 ml, semi-occluded	Not a dermal irritant or sensitizer
69.6% Olea Europaea (Olive) Fruit Oil in a foundation	HRIPT with 200 µl test material, occluded	Not a dermal irritant or sensitizer

https://www.cir-safety.org/sites/default/files/118_final_oils_web.pdf

Cocos Nucifera (Coconut) Oil

The oil is obtained from the pulp of coconut palm nuts. Contains triglycerides of fatty acids such as: lauric, myristic, oleic, capric and caproic. According to the CIR opinion coconut oil and its derivatives, coconut acid, hydrogenated coconut oil and hydrogenated coconut acid has been recognized as safe for use in products in current practices use and concentrations (Final Report Cosmetic Ingredient Review Expert Panel Amended Safety Assessment of Cocos Nucifera (Coconut) Oil, Coconut Acid, Hydrogenated Coconut Acid, Hydrogenated Coconut Oil, Ammonium Cocomonoglyceride Sulfate, Butylene Glycol Cocoate, Caprylic / Capric / Coco Glycerides, Cocoglycerides, Coconut Alcohol, Coconut Oil Decyl Esters, Decyl Cocoate, Ethylhexyl Cocoate, Hydrogenated Coco-Glycerides, Isodecyl Cocoate, Lauryl Cocoate, Magnesium Cocoate, Methyl Cocoate, Octyldodecyl Cocoate, Pentaerythrityl Cocoate, Potassium Cocoate, Potassium Hydrogenated Cocoate, Sodium Cocoate, Sodium Cocomonoglyceride Sulfate, Sodium Hydrogenated Cocoate, and Tridecyl Cocoate September 23, 2008 Safety Assessment). Maximum safe concentration in the cosmetic is up to 80%.

https://www.cir-safety.org/sites/default/files/119_draft_decylg_suppl1.pdf

RICINUS COMMUNIS SEED OIL

SUMMARY Ricin is a toxic glycoprotein (with several minor variants) belonging to the type II group of ribosome inactivating proteins (type II RIP) found in the seeds (beans) of the castor oil plant (*Ricinus communis* L. (Euphorbiaceae)). It is composed of two polypeptide chains of approximately 30 kDa joined by a disulfide bond. A limited number of other plants in the same family contain type II RIPs, i.e. subtropical leguminous climber *Abrus precatorius* L. and, *Croton* 1 For citation purposes: Scientific Opinion of the Panel on Contaminants in the Food Chain on a request from the European Commission on ricin (from *Ricinus communis*) as undesirable substances in animal feed. The EFSA Journal (2008) 726, 1-38. Opinion on ricin as undesirable substance in animal feed The EFSA Journal (2008) 726, 2-38

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tiglium L. which contain abrin and crotin I, respectively. The seeds of *Croton tiglium* contain a number of other toxins which make it unsuitable as a feed for livestock. In the Terms of Reference, the plant *Jatropha curcas* was also requested to be considered, however, it does not contain a RIP II protein. The toxicity of its seeds can be ascribed to the oil, which contain phorbol esters and this plant is therefore not relevant for this opinion on ricin.

Following extraction of castor oil, ricin is left in the press-cake/castor bean meal². Castor oil production mainly takes place outside the EU. Because of its low value of the press-cake as feed no import to the EU is expected.

Following cell uptake by endocytosis, ricin causes acute cell death by inactivation of ribosomal RNA. Acute symptoms in humans after intake of castor beans are hematemesis (vomiting containing blood), diarrhoea, haemorrhagic necroses in several organs, renal failure, circulatory collapse and death after 6 to 14 days with a fatal oral dose of about 1 mg/kg b.w. (5-10 castor beans). Because of its destruction in the intestinal tract, ricin is approximately 1000-fold more toxic following parenteral administration or inhalation, than by the oral route. Oral LD₅₀ values in rats and mice were 20 to 30 mg/kg b.w., and the corresponding intra peritoneal LD₅₀ value for mice is 22 µg/kg b.w. There are no data on chronic or reproductive toxicity, or genotoxicity of ricin. Crotin I showed LD₅₀ i.p. values in mice of 20 mg/kg b.w.

The very limited data on acute toxicity in target animals comprise mainly information on castor bean products rather than on purified ricin. Amongst ruminants, cattle appear to tolerate higher intakes than sheep. In horses severe colic and death have been observed after a single dose of approximately 7-8 mg ricin/kg b.w. Toxic effects in pigs and birds have been reported as well as accidental poisonings in dogs with vomiting, depression and diarrhoea as the main clinical signs. No- or lowest observed adverse effect levels (NOAELs or LOAELs) for acute effects of ricin could not be identified for any of the animal species.

<https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2008.726>

JUGLANS REGIA SEED OIL

CAS NO: 8024-09-7 / 84012-43-1

EC NO: - / 281-688-1

Juglans Regia Seed Oil is the oil derived from the nut meats of the Walnut, *Juglans regia* L., Juglandaceae

The European Commission requested the EFSA Panel on Plant Health to prepare and deliver risk assessments for commodities listed in Commission Implementing Regulation (EU) 2018/2019 as 'High risk plants, plant products and other objects'. Taking into account the available scientific information, including the technical information provided by the applicant country, this Scientific Opinion covers the

plant health risks posed by the following commodities: dormant, free of leaves grafted plants and rootstocks of *Juglans regia* imported from Moldova. A list of pests potentially associated with the commodities was compiled. The relevance of any pest was assessed based on evidence following defined criteria. None of the pests in the list fulfilled all relevant criteria and therefore none were selected for further evaluation. As a result, risk mitigation measures proposed in the technical dossier from Moldova were listed, but not further evaluated. (2)

Certainly, further studies are needed to draw convincing conclusions about walnut activity on humans. (1)

As mentioned, natural products are often proposed in the oncological field to potentiate the cytotoxic activity of traditional anticancer agents and reduce their toxicity. (1)

Indeed, all the studies involving walnut extracts or walnut-enriched diets disclosed a negligible toxicity together with antimutagenic activity and selective effect towards tumour cells. In contrast, different studies regarding walnut-enriched diets showed beneficial properties, such as prevention or delay of tumour initiation. In conclusion, what is certain is that the antitumour potential of walnut finds a solid foundation in its intrinsic chemical composition, but further studies are needed to identify the best approach to exploit this potential, and to confirm this activity on humans, considering both efficacy and safety. (1)

REFEREE

- 1- Natural Products to Fight Cancer: A Focus on *Juglans regia*, Elena Catanzaro , Giulia Greco , Lucia Potenza , Cinzia Calcabrini and Carmela Fimognari; Received: 27 October 2018; Accepted: 9 November 2018; Published: 14 November 2018
- 2- <http://www.noaelproject.it/content/commodity-risk-assessment-juglans-regia-plants-moldova?language=en>

BENTONITE

Short-Term Oral

Carson and Smith (1982) fed Bentonite at concentrations 0%, 2.5%, 7.5%, or 10% to male weanling rats to determine the most effective level to overcome the effects of T-2 toxicosis. Increasing the concentration of Bentonite resulted in significant increases in body weight and feed consumption. The most effective concentration tested was 10%. Bentonite had no effect on the activity of nonspecific hepatic esterase

Acute Parenteral

The body weights of the rats were moderately decreased and the lung weight increased 72 h after Bentonite exposure. After 90 days, the lung weight was only slightly greater than that of the control animals. Upon microscopic examination at 12 h, Bentonite exposure had resulted in a nonspecific inflammation of mostly neutrophils with perivascular edema, alveolitis, and incipient bronchopneumonia. A small number of macrophages and lymphocytes were detected. Dust particles were observed in the leukocytes and macrophages or extracellularly in the alveoli. After the 24th h, bronchopneumonia was present after coalescence of the inflammatory foci; the pneumonia then became necrotizing and desquamative. Necrotic neutrophilic leukocytes and eosinophil leukocytes were observed. The reticular network collapsed between the 48th and 72nd h. Exposure after 90 days, included dust storage foci filled with large foamy cells with pale cytoplasm. Closely packed cells with dark cytoplasm and nuclei were located at the periphery.

REFEREE

Andersen F, (ed),. Final Report on the Safety Assessment of Aluminum Silicate, Calcium Silicate, Magnesium Aluminum Silicate, Magnesium Silicate, Magnesium Trisilicate, Sodium Magnesium Silicate, Zirconium Silicate, Attapulgit, Bentonite, Fuller's Earth, Hectorite, Kaolin, Lithium Magnesium Silicate, Lithium Magnesium Sodium Silicate, Montmorillonite, Pyrophyllite, and Zeolite. Int J Toxicol. 2003;22(Suppl 1):37-102.

<https://pubmed.ncbi.nlm.nih.gov/12851164/>

In addition to MoS calculations, the IFRA certificate of conformity provided by the manufacturer was also used in the safety assessment of this product. The perfume concentration (2.0%) in the product is below the maximum concentration that can be used according to the acceptance criteria set by IFRA for this category.

(Class 9A, maximum utilization rate 5.00%)

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CITRAL	106-26-3 141-27-5 5392-40-5	0,000000559116	100	178853762	https://echa.europa.eu/lt/registration-dossier/-/registered-dossier/13515/7/6/1
GERANIOL	106-24-1	0,00002620926	300	11446336,14	https://echa.europa.eu/lt/registration-dossier/-/registered-dossier/14184/7/6/1
1-Octen-3-yl acetate	2442-10-6	0,00002620926	100	3815445,381	http://fragrancematerialsafetyresource.elsevier.com/sites/default/files/112-14-1.pdf
Coumarin	91-64-5	0,00002620926	138,3	5276760,962	https://echa.europa.eu/de/registration-dossier/-/registered-dossier/11472/7/6/2
LIMONENE	138-86-3 7705-14-8 5989-27-5 5989-54-8	0,000381807036	250	654781,0188	https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2015.4053
linalool	126-90-9 126-91-0 78-70-6	0,003560322348	117	32862,19296	https://echa.europa.eu/de/registration-dossier/-/registered-dossier/14501/7/9/2

MoS>100 is found for perfume components.

9. Undesirable Effects and Serious Undesirable Effects

Not known or reported. Any adverse reactions and serious adverse effects will be reported. Any serious adverse effect will be notified to the Ministry of Health. If the supplier is aware of customer complaints the supplier must bring this to the attention of the safety assessor and submit this formulation for reassessment and notify the competent authorities of corrective actions taken.

10. Information on the Cosmetic Product

The information contained in the report as follows:

- Certificate of Analysis or Specifications of Finished Product
- Certification of Analysis and Specifications of Ingredients
- Formulation of the Product

- Packaging Quality Certificate
- Stability Test report
- Physical and chemical test report
- Challenge test report

B. COSMETIC PRODUCT SAFETY ASSESSMENT

1. Assessment Conclusion

The safety assessment report of this product is prepared for adults use. MoS>100 is found for raw materials. The calculation was performed assuming that dermal absorption is 100 %. With this worst case study, it is evaluated that the use of this raw material in this product is safe.

In addition to MoS calculations, the IFRA certificate of conformity provided by the manufacturer was also used in the safety assessment of this product. The perfume concentration (2%) in the product is below the maximum concentration that can be used according to the acceptance criteria set by IFRA for this category. (Class 9A, maximum utilization rate 5.00%). MoS>100 is found for perfume components.

The ingredients of the product are permitted ingredients for cosmetics. All raw materials are not toxic under normal or reasonably unforeseeable conditions of use at this concentration. The product does not contain prohibited substances listed in annexes of Regulation (EC) No. 1223/2009. Composition of the product complies with the requirements of the EU Cosmetic Regulations.

Based on all data available it can be assumed that the cosmetic product “ **VOLCANIC CLAY** “ soap is safe for human health when used under normal or reasonably foreseeable conditions of use in accordance with Regulation (EC) No 1223/2009.

There are restrictions for SODIUM HYDROXIDE which is allowed in cosmetic products as pH adjuster when pH <11. Based on the fact, that Sodium hydroxide is consumed during the soap-making process and it is not contained in the final product, the restriction does not apply.

The list of ingredients is based on the ingredients that are used to make the soap.

Following review of the information provided for the above product and its ingredients, the product is considered safe for the intended application and complies with EC Regulation 1223/2009.

This safety assessment for human health is based upon information available at this date. Reviews of this assessment will be made as and when new information becomes available.

2. Labelled Warnings and Instructions of Use

Warnings on the product label:

Avoid contact with eyes and mouth. In case of contact, rinse thoroughly with plenty of water.

Application of the Product:

Before use, read the instructions of your product at sopna.co, you can access the site with QR code. Keep in a dry place

3. Reasoning

This report is prepared based on the Regulation (EC) No. 1223/2009 on cosmetic products and The SCCS's Notes of Guidance for the Testing of Cosmetic Ingredients and Their Safety Evaluation 9th Revision 2015. The Product is a body soap. Application area is the body area. Rinse-off Product. 100% use in cosmetic products is safe. Attached information and documents (MSDS's, TDS's, , etc) and the references at the product Microbiology, Stability and Free claim test results Safety information report is also used. Physical-chemical specifications, microbiological data are acceptable.

All the ingredients Mos value is above >100. The product is safe to use as cosmetic product according to cosmetic regulations. The margin of safety for ingredients which have no NO(A)EL value could not calculate. The toxicological profile have been assessed for substances that missing NO(A)EL values. components in the product has no risk to the consumers. This type of formulation has been in common use in cosmetics over many years without any particular concerns. In the table the margin of safety of each of the ingredients used are given. All the results contained in the report in section A reasoning that product is safe.

4. Assessor's Credentials and Approval of Part B

COSMETIC PRODUCT SAFETY ASSESSMENT
According to (EC) No 1223/2009 Cosmetic Regulation

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Proof of qualification of safety assessor:

Pharmacist,

Graduated School : Gazi University Faculty of Pharmacy

Master's Degree : Ankara University faculty of Pharmacy

Diploma attached.

Date and signature of safety assessor:

Fatih KEÇELİ

