

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 22, 2024

MEMORANDUM

SUBJECT: IN-11401; Various Fragrance Components. Human Health Risk Assessment and Ecological Effects Assessment to Support Inert Ingredient Approval for use in Pesticide Formulations

Decision No.: 560320 **Registration No.:** N/A

PC Code: Multiple (See Section III) **CAS No.:** Multiple (See Section III) **Petition No.:** IN-11401 **Regulatory Action:** Addition to inert ingredient list

FROM: David Lieu, Chemist Chemistry, Inert, and Toxicology Assessment Branch (CITAB) Registration Division (7505T) Digitally signed by DAVID

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1. EXECUTIVE SUMMARY

In February 2020, Innovative Reform Group (IRG), on behalf of The Clorox Company, submitted a petition (IN-11401) to the Environmental Protection Agency (EPA or the Agency) requesting an exemption from the requirement of tolerance for various fragrances (CAS Reg. No. multiple) as inert ingredients for use under 40 CFR \S 180.940(a) in antimicrobial pesticide formulations used on food contact surfaces in public eating places, dairy processing equipment, and food processing equipment and utensils with end-use concentration not to exceed 33 ppm.

Although there is generally a lack of chemical-specific animal toxicity data for these fragrances, predictive toxicology indicates low potential for carcinogenicity and the expected use concentration is low. Therefore, the Agency assessed these fragrance components via the Threshold of Toxicological Concern (TTC) approach as outlined by the European Food Safety Authority (EFSA) in their 2019 guidance document on the use of TTC in food safety assessment.

TTCs are derived from a conservative and rigorous approach developed by Munro and Kroes to establish generic threshold values for human exposure at which a very low probability of adverse effects is likely. By comparing a range of compounds by Cramer Class (classes I, II, and III) and NOEL (no-observed-effect-level), fifth percentile NOELs were established for each Cramer Class as "Human Exposure Thresholds". These values were 3, 0.91 and 0.15 mg/kg/day for classes I, II and III, respectively. All fragrances in this document are in Cramer class II; therefore, this assessment uses the NOEL of 0.91 mg/kg/day as the point of departure for all exposure scenarios assessed (chronic dietary, incidental oral, dermal and inhalation exposures).

The dietary assessment for food contact sanitizer solutions calculated the Daily Dietary Dose (DDD) and the Estimated Daily Intake (EDI). The assessment considered: application rates, residual solution or quantity of solution remaining on the treated surface without rinsing with potable water, surface area of the treated surface which comes into contact with food, pesticide migration fraction, and body weight. These assumptions are based on FDA guidelines (1993).

The dietary assessment for food contact sanitizer solutions showed that children 1-2 years old would be the highest exposed subgroup (58% of the cPAD). The general U.S. population resulted in 21% of the cPAD. As these percent cPADs do not exceed 100%, they are not of concern.

Combined short-term aggregated food, water, and residential pesticidal exposures result in MOEs of 455 for both adult males and females and 168 for children. As the level of concern is for MOEs that are lower than 100, these MOEs are not of concern.

Although the proposed use for these fragrances as an inert ingredient in antimicrobial products is expected for residential use, it is possible that these products could be used in commercial

settings. However, exposures in commercial settings have already been incorporated into the FDA model used. Therefore, an additional occupational exposure assessment is not needed.

Environmental fate and ecological effects are expected to be minimal as only indoor exposure scenarios are anticipated.

Taking into consideration all available information for the fragrances listed in this document, EPA has determined that there is a reasonable certainty that no harm to the general population or any population subgroup, including infants and children, will result from aggregate exposure to residues of these fragrances. Therefore, the establishment of an exemption from the requirement of a tolerance under 40 CFR 180.940 for residues of the listed fragrances when used as inert ingredients in pesticide formulations at concentrations not to exceed 33 ppm of the formulation can be considered assessed as safe under section 408 of the FFDCA.

2. BACKGROUND

In February 2020, Innovative Reform Group, on behalf of The Clorox Company, submitted a petition (IN-11401) requesting an exemption from the requirement of a tolerance for various chemicals (CAS Reg. No. multiple, listed in section III) as inert ingredients under 40 CFR § 180.940(a) for use as fragrance components in antimicrobial pesticide formulations for use on food contact surfaces in public eating places, dairy processing equipment, and food processing equipment and utensils at end-use concentrations not to exceed 33 parts per million (ppm). EPA published the notice of filing (NOF) for this petition in the Federal Register on June 2, 2021 (86 FR 29229). No substantive comments were received in response to this notice.

Although there generally is limited animal toxicity data for the listed fragrances, there is a predicted low carcinogenic potential for these substances and these fragrances will be used at low concentrations (≤33ppm) in pesticide formulations. Therefore, the Agency will be assessing these fragrance components via the Threshold of Toxicological Concern (TTC) approach as outlined by the European Food Safety Authority (EFSA) in their 2019 guidance document on the use of TTC in food safety assessment. This approach relies on the most recent evaluation of the literature on TTC as reviewed by EFSA and the World Health Organization (WHO) in 2016. Information regarding the database of studies and chemicals used to derive TTCs are reviewed therein. The TTC approach has been used by the Joint Expert Committee on Food Additives of the U.N.'s Food and Agriculture Organization and the World Health Organization, the former Scientific Committee on Food of the European Commission and by the European Medicines Agency, and EFSA. Details about how the TTC method is applied can be found in section IV of this document.

This document provides an assessment of the risk to human health and the environment for the listed chemicals when used as inert ingredients (fragrance) in food-use antimicrobial

pesticide formulations. Information from the submitter's petition is referenced in this assessment.

3. INERT INGREDIENT PROFILE

The Clorox Company proposes amending the 40 CFR 180.940(a) to include the following fragrance components: For more details, including molecular formulas and simplified molecular-input line-entry system (SMILES) for each of these chemicals, please see Appendix III.

In the case of the fragrance components listed above, most of these chemicals already have EPA approval for nonfood use in pesticide formulations. Also, many of these substances have been approved for use as a flavoring substance in food under 21 CFR 172.515 or 182.60 by the U.S. Food and Drug Administration (FDA). Additionally, the fragrance components listed above have all been evaluated and approved for use as food flavoring agents by the Joint Food and Agricultural Organization of the United Nations/World Health Organization Expert Committee

on Food Additives (JECFA) as part of their assessment of more than 2,300 food flavoring substances. Toxicological profiles on each are available via the links to the relevant JECFA summary in Appendix II.

4. HAZARD CHARACTERIZATION

4.1. Toxicology Summary

There is limited animal toxicity information available for the fragrances listed in section III. The Joint FAO/WHO Expert Committee on Food Additives (JECFA) reviewed available toxicity information for these chemicals and structurally related compounds in a series of reports, as described in Appendix II. Information from these reports as well as predictive toxicology using the OECD QSAR Toolbox was used to confirm that the fragrances listed in section III have low carcinogenic potential and are thus good candidates for the application of the TTC method. For most chemicals, no alerts were found using the carcinogenicity (genotox and nongenotox) alerts by the ISS tool in the OECD QSAR Toolbox (see Appendix III). For 17 chemicals (CAS Reg. Nos. 120-57-0; 326-61-4; 118-71-8; 3658-77-3; 65416-14-0; 1128-08-1; 488-10-8; 6261-18-3; 11050-62-7; 21834-92-4; 1604-28-0; 4674-50-4; 80-71-7; 13679-70-4; 121-32-4; 67801-20-1; 104-76-7), carcinogenicity alerts were found with the QSAR Toolbox. However, JECFA has concluded in its reports, and EPA concurs, that these 17 chemicals all have a low carcinogenic potential, based on *in vitro* and/or *in vivo* genotoxicity studies available on the chemical or structurally related chemicals (see Appendix II). Therefore, the TTC method can be applied to all fragrances listed in section III.

Munro (1996) developed TTC values for non-cancer effects which were based on analyses of NOAELs from repeated dose toxicity data for chemicals separated into three structural classes using the Cramer (1978) decision scheme. A TTC value was calculated from the respective distribution of NOELs for each of the 3 Cramer structural classes, using a database of 613 chemicals with 2941 NOELs. These substances represent a range of industrial chemicals, pharmaceuticals, food chemicals and environmental, agricultural and consumer chemicals likely to be encountered in commerce with good supporting toxicological data, yielding 137, 28 and 448 chemicals in Cramer class I, II and III, respectively. For each of the 613 chemicals, the most conservative NOEL was selected, based on the most sensitive species, sex and endpoint. The fifth percentile NOEL (in mg/kg bw/day) was calculated for each structural class as "Human Exposure Thresholds". These values were 3, 0.91 and 0.15 mg/kg/day for classes I, II and III, respectively.

The TTC values for Cramer structural classes derived by Munro in 1996 have been supported by all subsequent analyses of additional databases (providing that the 5th percentile NOEL/NOAEL is converted to a TTC value using the same 100-fold safety factor). Blackburn (2005) analyzed a database of 145 chemicals found in personal and household products; Bernauer (2008) analyzed reproductive and developmental toxicity data for 91 chemicals assessed for oral toxicity under REACH; Brown (2009) analyzed data for 100 active pesticides and 15 pesticide

metabolites and concluded that the TTC values are valid; Pinalli (2011) analyzed the TDIs for 232 food contact materials in relation to the TTC and found that the distribution of recalculated NOAELs was similar to that reported by Munro; Tluczkiewicz (2011) analyzed the RepDose database of 521 chemicals, using dose levels expressed on a molar basis making direct comparison difficult, but the distribution of NOAELs, the overlap between Cramer classes and the TTC values were comparable to Munro; van Ravenzwaay (2011) analyzed data for pre-natal toxicity using NOAELs for maternal and developmental toxicity and found 5th percentile values higher (maternal NOAELs = 4 mg/kg/day, developmental NOAELs = 5 mg/kg/day) than those used by Munro (NOEL = 3 mg/kg/day); Kalkhof (2012) analyzed NOAELs from subacute and subchronic studies (with adjustment for duration of study) on 813 different chemicals and found TTC values for Cramer classes I, II and III similar to those of Munro; Laufersweiler (2012) analyzed reproductive and developmental toxicity data for 283 chemicals and generated TTC values 2-3 times higher than those of Munro. Feigenbaum (2015) assessed the reliability of the TTC approach using 328 pesticides that had been fully evaluated by the EU and by EFSA and concluded that the respective TTC values are protective, even for these biologically active substances.

4.2. Toxicity Endpoint Selection

As outlined in section IV, fifth percentile NOELs established by Munro are 3, 0.91 and 0.15 mg/kg/day for Cramer classes I, II and III, respectively. In the case of the fragrance components listed above, they are all in the Cramer Class II category, which is defined as less innocuous than substances in Class I, but no positive indication of toxic potential. Therefore, the 5th percentile NOEL value of 0.91 mg/kg/day is selected as the point of departure (POD) for all exposure scenarios, as described in Table 2 below.

The OECD Toolbox outputs are provided in Appendix III. Multiple of the OECD Toolbox outputs suggested Cramer classes other than "II". However, all chemicals in this document were ultimately classified as Cramer class II. Please see explanations and justifications in Appendix IV.

Point of departure (POD) = A data point or an estimated point that is derived from observed dose-response data and used to mark the beginning of extrapolation to determine risk associated with lower environmentally relevant human exposures. NOEL = no-observed-effect level. UF = uncertainty factor. UF_A = extrapolation from animal to human (interspecies). UF_H = potential variation in sensitivity among members of the human population (intraspecies).FQPA SF = FQPA Safety Factor. PAD = population-adjusted dose (a = acute, c = chronic). RfD = reference dose. MOE = margin of exposure. LOC = level of concern.

4.3. Special Considerations for Infants and Children

FFDCA Section 408(b)(2)(C) provides that EPA shall retain an additional tenfold (10X) margin of safety for infants and children in the case of threshold effects to account for prenatal and postnatal toxicity and the completeness of the database on toxicity and exposure unless EPA determines based on reliable data that a different margin of safety will be safe for infants and children. This additional margin of safety is commonly referred to as the FQPA safety factor (SF). In applying this provision, EPA either retains the default value of 10X, or uses a different additional safety factor when reliable data available to EPA support the choice of a different factor. The FQPA SF has been reduced to 1X in this risk assessment because clear NOELs and LOELs were established in the studies analyzed by Munro et al 1996 (which included developmental and reproductive toxicity studies), maternal and developmental-specific 5th percentile NOAELs calculated by van Ravenzwaay et al 2011 indicate low potential for offspring susceptibility, and the conservative assumptions made in the exposure assessment are unlikely to underestimate risk.

5. DIETARY EXPOSURE

Dietary exposure (food and drinking water) may occur from the existing and proposed pesticidal uses of these various fragrances (e.g., eating foods placed on surfaces cleaned with pesticide formulations containing these various fragrances, and drinking water exposures). Dietary exposure may also occur from non-pesticidal uses but no reliable information is available for non-pesticidal exposures. Therefore, EPA assessed dietary exposures from pesticidal uses of these various fragrances only.

The FDA food contact surface sanitizing solution dietary exposure assessment model was used to calculate an Estimated Daily Intake (EDI) and Daily Dietary Dose (DDD) using assumptions described in Appendix I. The original FDA model only derived an exposure amount but did not specifically address population subgroups. Therefore, data from the National Health and Nutrition Examination Survey (NHANES) on food consumption (specifically the 2005-2010 survey data) was used to obtain adjustment factors (AFs). Adjusted DDDs for the US population and various population subgroups were obtained by multiplying the DDDs by the AFs, as described in Table 3. The %cPADs were then calculated by comparing the cPAD to the adjusted DDDs.

Acute Dietary Risk Assessment: No acute dietary effects are anticipated from uses at concentrations ≤ 33 ppm. Therefore, a quantitative acute dietary assessment is not necessary.

Chronic Dietary Risk Assessment: The chronic dietary exposure for food and drinking water utilized 21% and 58% of the cPAD for the U.S. population and children 1-2 years old (the most highly exposed population), respectively (see results in Table 3 and assumptions in Appendix II). These risks were not of concern (i.e. values were below 100% of the cPAD).

Cancer Dietary Risk Assessment: These various fragrances are not expected to be carcinogenic, based on their TTC evaluation. Therefore, a cancer dietary exposure assessment was not performed.

¹ DDD = Daily Dietary Dose = Estimated Daily Intake/Body weight

² Adjustment factor (AF)= total food consumed by each population/total food consumed by the US population

³ Adjusted DDD = DDD*AF

⁴ %cPAD = (Adjusted DDD/cPAD)*100

6. RESIDENTIAL EXPOSURE ASSESSMENT

The term "residential exposure" is used in this document to refer to non-occupational, nondietary exposure (e.g., for lawn and garden pest control, indoor pest control, termiticides, and flea and tick control on pets). Although there are non-pesticidal uses for these various fragrances, no reliable exposure information is available to EPA on those uses. These various fragrances may be used as an inert ingredient in pesticide products that are registered for specific uses that may result in residential exposure, such as pesticides used in and around the home. Therefore, screening level residential handler and post-application risk assessments have been performed for common residential exposure scenarios, using assumptions detailed in the 2012 Residential SOPs[1](#page-11-0).

Residential handler exposure: the Agency assumed handlers may receive short-term and intermediate-term dermal and inhalation exposure to these various fragrances from formulations containing the inert ingredient in outdoor and indoor scenarios. Also, homeowners are assumed to complete all elements of an application without use of any protective equipment. Long-term exposures are not calculated because applications are not expected to occur daily for more than 6 months. As shown in tables 4 below, residential handler MOEs range from 13,000 to 230,000 and are not of concern (i.e., MOEs are >100).

Residential post-application exposure: Residential post-application scenarios include shortand intermediate-term dermal (skin contact with treated surfaces) exposure for adults and children as well as short-term incidental oral exposure for children (hand-to-mouth exposure with treated surfaces). As shown in table 5 below, the lowest residential post-application MOE is 16,000 and is not of concern (i.e., MOEs are >100).

¹ Available at [https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/standard-operating-procedures](https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/standard-operating-procedures-residential-pesticide)[residential-pesticide](https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/standard-operating-procedures-residential-pesticide)

1. Based on application assumptions described in D364751 (A. LaMay, 2009)

2. Based on HED's 2012 Residential SOPs [\(https://www.e](https://www/)pa.gov/pesticide-science-and-assessing-pesticide-risks/standard-operating-procedure-residential-exposure).

3. Dermal Dose = Dermal Unit Exposure (mg/lb ai) × Application Rate (lb ai/acre or gal) × Area Treated or Amount Handled (A/day or gallons/day) x dermal absorption factor ÷ BW (80 kg). 4. Dermal MOE = Dermal NOAEL (mg/kg/day) ÷ Dermal Dose (mg/kg/day)

5. Inhalation Dose = Inhalation Unit Exposure (mg/lb ai) × Application Rate (lb ai/acre or gal) × Area Treated or Amount Handled (A/day or gallons/day) x inhalation absorption factor ÷ BW (80 kg).

6. Inhalation MOE = Inhalation NOAEL (mg/kg/day) ÷ Inhalation Dose (mg/kg/day)

7. Total MOE = 1/ ((1/dermal MOE)+(1/inhalation MOE))

NA =not applicable due to negligible unit exposure

1. Transferable residue = deposited residue*fraction transfered where the deposited residue is the application rate in ug/cm2 and the fraction transfered=0.08

2. Exposure assumptions obtained from 2012 Residential SOPs

3. Dermal Exposure =(Transferable residue)(Weight unit conversion factor in mg/ug)(Transfer coefficient in cm2/hr)(exposure time)

Hand to Mouth Exposure =(HR*(FM*SAH)*(exposure time*N_replen)*(1-(1-SE)^(HtM events per hour/N_replen))

4. Dose (mg/kg/day) = Exposure (mg/day) (dermal absorption factor for dermal route only)/ BW (80 kg for adults or 11 kg for children)

5. MOE = POD (mg/kg/day) ÷ Dose (mg/kg/day).

6. Combined MOE = $1 / ((1/$ Dermal MOE)+ $(1/$ hand to mouth M

7. AGGREGATE ASSESSMENT

The Federal Food, Drug, and Cosmetic Act (FFDCA) section 408 directs EPA to consider available information concerning exposure from the pesticide residue in food and other nonoccupational exposures to determine that "there is a reasonable certainty that no harm will result from aggregate exposure to the pesticide chemical residue, including all anticipated dietary exposures and all other exposures for which there is reliable information".

In an aggregate assessment, exposures from relevant sources are added together and compared to quantitative estimates of hazard (e.g., a NOAEL or PAD), or the risks themselves can be aggregated. When aggregating exposures and risks from various sources, EPA considers both the route and duration of exposure.

Acute aggregate risk:

There is no acute dietary endpoint therefore an acute aggregate risk is not assessed.

Short-term aggregate risk: Short-term aggregate exposure takes into account short-term residential (dermal and inhalation) exposure plus chronic dietary exposure (food and drinking water). As shown in table 6 below, no short-term aggregate risks of concern were identified (i.e., MOEs are >100).

¹ Indicate in this footnote the basis for the LOC (include the standard inter- and intra- species uncertainty factors totaling 100). ² Maximum Allowable Exposure (mg/kg/day) = NOEL/LOC.

3 Residential Exposure = [Oral exposure + Dermal exposure + Inhalation Exposure]. Residential exposure values used in aggregate assessment (Table # 4 & 5).

 4 Total Exposure = Avg Food & Water Exposure + Residential Exposure.

⁵ Aggregate MOE = [NOEL/(Avg Food & Water Exposure + Residential Exposure)].

Intermediate-term aggregate risk: Intermediate-term aggregate exposure takes into account intermediate-term residential (dermal and inhalation) exposure plus chronic dietary exposure (food and drinking water). As the same endpoints were selected for short-term and intermediate-term exposures, intermediate-term aggregate risk is equal to the short-term aggregate risk and it is not of concern (see table 6 above).

Chronic aggregate risk: A chronic aggregate risk assessment considers exposure estimates from chronic dietary consumption of food and drinking water. Therefore, the chronic aggregate risk is equal to the chronic dietary risk, and it is not of concern (see section 5 above).

Aggregate Cancer Risk: The EPA has not identified any concerns for carcinogenicity relating to these various fragrances. Therefore, these various fragrances are not expected to pose a cancer aggregate risk.

8. OCCUPATIONAL EXPOSURE ASSESSMENT

The occupational handler MOEs ranged from 200 to 14,000 (LOC is for MOEs<100) for the assumed maximum applications rates when a double layer of clothing and gloves are worn by workers (see Table 7 below). Therefore, no occupational risks of concern were identified.

1. Dermal dose = Dermal unit exposure/1000*Application rate*area treated or amount handled daily

2. Dermal MOE = Dermal POD/Dermal dose

3. Inhalation dose = Inhalation unit exposure/1000*Application rate*area treated or amount handled daily

4. Inhalation MOE = Inhalation POD/Dermal dose

9. CUMULATIVE EXPOSURE

Section 408(b)(2)(D)(v) of FFDCA requires that, when considering whether to establish, modify, or revoke a tolerance, the Agency consider "available information" concerning the cumulative effects of a particular pesticide's residues and "other substances that have a common mechanism of toxicity."

EPA has not found these various fragrances to share a common mechanism of toxicity with any other substances, and these various fragrances do not appear to produce a toxic metabolite produced by other substances. For the purposes of this tolerance exemption, therefore, EPA has assumed that these various fragrances do not have a common mechanism of toxicity with other substances. For information regarding EPA's efforts to determine which chemicals have a common mechanism of toxicity and to evaluate the cumulative effects of such chemicals, see https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/cumulative-assessmentrisk-pesticides.

10. ECOTOXICITY AND ENVIRONMENTAL FATE

Environmental fate and effects are expected to be limited and not of concern as the exposure scenarios for 40 CFR 180.940(a) are expected to be on indoor surfaces and a low limitation of 33 ppm is being set for all fragrances listed in this document

11. RISK CHARACTERIZATION

Based on a quantitative human health risk assessment, no risks of concern were identified for the U.S. population, including infants and children following exposure to these various fragrances. Exposures assessed included the oral, dermal and inhalation routes.

Based on the use pattern and anticipated low use concentration, there is low concern for environmental toxicity.

Page **19** of **111** Taking into consideration all available information, EPA concludes that there is a reasonable certainty that no harm to any population subgroup will result from exposure to these various fragrances when considering sources of pesticide exposure for which there is reliable information. Therefore, the use of these various fragrances as inert ingredients under 40 CFR 180.940(a) in antimicrobial pesticide formulations used on food contact surfaces in public eating places, dairy processing equipment, and food processing equipment and utensils with

end-use concentration not to exceed 33 ppm of the finished product can be considered assessed as safe.

References

Barlow, S. M., et al. "Threshold of toxicological concern for chemical substances present in the diet. Report of a workshop, 5-6 October 1999, Paris, France." Food and chemical toxicology: an international journal published for the British Industrial Biological Research Association 39.9 (2001): 893-905.

Bernauer, Ulrike, et al. "Exposure-triggered reproductive toxicity testing under the REACH legislation: A proposal to define significant/relevant exposure." Toxicology letters 176.1 (2008): 68-76.

Blackburn, Karen, et al. "Application of the threshold of toxicological concern approach to ingredients in personal and household care products." Regulatory Toxicology and Pharmacology 43.3 (2005): 249-259.

Brown, Richard, et al. "Applicability of thresholds of toxicological concern in the dietary risk assessment of metabolites, degradation and reaction products of pesticides." EFSA Supporting Publications 7.3 (2009): 44E.

Cramer, G. M., R. A. Ford, and R. L. Hall. "Estimation of toxic hazard—a decision tree approach." Food and cosmetics toxicology 16.3 (1978): 255-276.

EFSA Scientific Committee. "Scientific Opinion on Exploring options for providing advice about possible human health risks based on the concept of Threshold of Toxicological Concern (TTC)." EFSA journal 10.7 (2012): 2750.

EFSA Scientific Committee. "Draft Guidance on the use of the Threshold of Toxicological Concern approach in food safety assessment." EFSA journal (2018)

EFSA Scientific Committee, More SJ, Bampidis V, Benford D, Bragard C,Halldorsson TI, Hernandez-Jerez AF, Hougaard BS, Koutsoumanis KP, Machera K, Naegeli H, NielsenSS, Schlatter JR, Schrenk D, Silano V, Turck D, Younes M, Gundert-Remy U, Kass GEN, Kleiner J, RossiAM, Serafimova R, Reilly L and Wallace HM, 2019. Guidance on the use of the Threshold of Toxicological Concern approach in food safety assessment. EFSA Journal 2019;17(6):5708, 17 pp.https://doi.org/10.2903/j.efsa.2019.5708

Klaunig, J.E., et al, "PPARalpha Agonist-Induced Rodent Tumors: Modes of Action and Human Relevance", Critical Reviews in Toxicology, (2003) Vol. 33, No. 6, pp. 655-780.

Munro IC, Ford RA, Kennepohl E and Sprenger JG. "Correlation of structural class with noobserved-effect levels: a proposal for establishing a threshold of concern". Food and Chemical Toxicology, 34, (1996) 829–867.

US FDA (1993). Food and Drug Administration Guidance. Sanitizing Solutions: Chemistry Guidelines for Food Additive Petitions. Docket EPA-HQ-OPP-2008-0110-0009.

Van Ravenzwaay, B. et al. "The threshold of toxicological concern for prenatal developmental toxicity". Regulatory Pharmacology and Toxicology. 59 (2011). 81-90.

Appendix I.

FDA Food Contact Surface Sanitizing Solution Dietary Exposure Assessment Model

Where:

Appendix II. Summary of Genotoxicity Information for Chemicals with Carcinogenicity Alerts found Using the OECD QSAR Toolbox (Carcinogenicity Alerts by ISS Profiler)

Appendix III. Results from QSAR Toolbox Analysis Using QSAR Toolbox 4.5 [\(http://www.qsartoolbox.org/home\)](http://www.qsartoolbox.org/home)

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Appendix IV. Explanation and Justification for OCED Toolbox outputs indicating Cramer classification other than II.

Two outputs regarding Cramer decision tree classification are provided from the OECD Toolbox (Appendix II):

- A. Toxic hazard classification by Cramer (original)
- B. Toxic hazard classification by Cramer (extension)

Outputs (A) and (B) are from the QSAR toolbox (TB) algorithms. Output A represents a programming of the original steps outlined by Cramer and associates based on the scheme published in 1978 (Cramer et al., 1978). The extended algorithm contains 5 additional questions. The QSAR toolbox offers datasheets on each algorithm (see QSAR toxtree accessed 20230905 and QSAR toxtree_extended assessed 20230905).

The Cramer scheme requires expert knowledge or databases on "normal constituents of the body" (Q1), "common terpenes" (Q16) and "common component of food" (Q22). The manner in which these questions, as well as questions regarding hydrolysis of esters and acetals and the interpretation of other questions of the Cramer tree for the purpose of programming the algorithms have differed among the programmers involved (Lapenna and Worth, 2011; Bhatia et al., 2015). The OECD QSAR V.4 Application Manual is using external files with 440 compounds in "Common component of food" and 107 compounds in "Normal constituents of body" from ToxTree v.2.1.0 [\(https://toxtree.sourceforge.net/\).](https://toxtree.sourceforge.net/))

The approach used by JECFA relied on expert judgement for each compound, following the original Cramer et al., 1978 publication. JECFA experts examined peer-reviewed literature and currated databases (such as Volatile Compounds in Food) to answer questions 16 and 22 on normal constituents of the body, common terpenes and common components in food. In addition, metabolism data was used to predict the hydrolysis of esters and acetals. As the petition cites the JECFA safety determinations, we used the Cramer classifications as assigned by JECFA.

For some materials, the OECD Toolbox output classifies the material as a common terpene based on database knowledge. However, some materials have natural occurrence data relevant to question 22 (common components in food) that have been evaluated by JECFA, but not considered by the OECD QSAR Toolbox. A summary table of the substances with discrepancies between the JECFA assigned decision tree class and the OECD Toolbox "Toxic hazard classification by Cramer (original)" field is listed below.

References

Bhatia, S., Schultz, T., Roberts, D., Shen, J., Kromidas, L., Api, A.M., 2015. Comparison of Cramer classification between Toxtree, the OECD QSAR Toolbox and expert judgment. Regul Toxicol Pharmacol 71(1), 52-62. doi: 10.1016/j.yrtph.2014.11.005.

Cramer, G.M., Ford, R.A., Hall, R.L., 1978. Estimation of toxic hazard--a decision tree approach. Food Cosmet Toxicol 16, 255-276.

Lapenna, S., Worth, A., 2011. Analysis of the Cramer classification scheme for oral systemic toxicity implications for its implementation in Toxtree, JRC Scientific and Technical Reports. European Commission Joint Research Centre Institute for Health and Consumer Protection, European Union.