



## Introductions

#### **Autumn Blum**

- Award winning cosmetic chemist
- Ocean advocate & technical diver
- Entrepreneur: founder of Stream2Sea, Organix-South, Scuba Girls
- I noticed a sunscreen 'oil slick' when diving in Palau a few years back and knew we could do bette







## FDA Revoked GRASE, 2019

# Proposed GRASE Status for Sunscreen Active Ingredients



GRASE* for use in sunscreens	Not GRASE** for use in sunscreens	***Insufficient data for use in sunscreens
Zinc oxide and titanium dioxide	Aminobenzoic acid (PABA) and trolamine salicylate	Cinoxate, dioxybenzone, ensulizole, homosalate, meradimate, octinoxate, octisalate, octocrylene, padimate O, sulisobenzone, oxybenzone, avobenzone

\*GRASE= Generally Recognized as Safe and Effective \*\*These ingredients are not currently marketed. \*\*\*For those ingredients in the "insufficient data" category, FDA proposes that it needs additional data to determine that sunscreens with these ingredients would be GRASE.



## Our reefs need our protection, but at what cost?

Climate change driving skin cancer
WHO estimates that just a 10%
reduction in the ozone layer
could generate

300,000

additional skin cancer cases in any one year\*



# Our reefs need our protection, but at what cost?









# Sunscreens: Organic vs. Mineral

**Q:** What is the efficacy of different active ingredients (organic and mineral UV filters available in the United States), and application methods for protecting human health?



# Sunscreens: Organic vs. Mineral



Mineral UV Filters are comprised of "nature identical minerals" obtained by transformation of inorganic compounds mined from the earth and then processed to obtain clean and safe UV filters

#### Mineral / Inorganics

- ✓ Minerals are coated and dispersed to improve performance and aesthetics
- ✓ Extensively used in products marketed as reef/coral safe and formulations for sensitive skin due to no skin penetration / irritation
- ✓ Approved for use at levels up to 25% globally
- √ Achieve high SPF on their own

#### **Chemical / Organics**

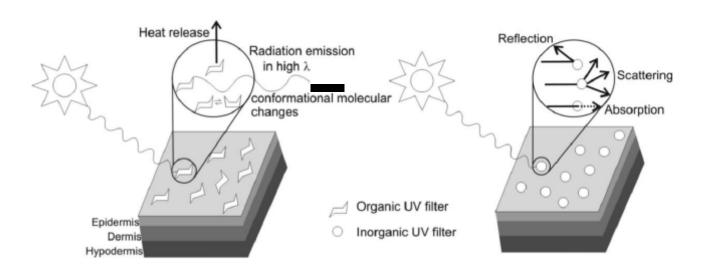
- fossil derived in origin and are entirely synthetic chemical compounds
- Questions over environmental impact (Hawaii ban) and skin penetration (FDA)
- Permitted use levels are limited to 4 -10% depending on regulations
- · Cocktails required for high SPF

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## Sunscreens: Chemical Vs. Mineral

Mode of action of organic (left) and inorganic (right) UV filters



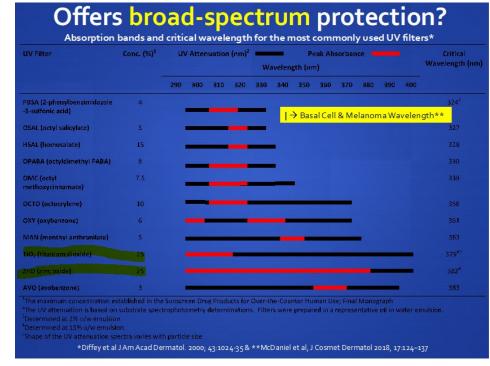


# **UV** Absorption

FDA Monograph Sunscreen Ingredients	Amount of Ray Protection		Chemical (C) or Physical (P)
	UVA	UVB	
Aminobenzoic acid (PABA)	0	•	С
Avobenzone	•	•	С
Cinoxate	•	•	С
Dioxybenzone	•	•	С
Ecamsule	•	•	С
Homosalate	0	•	С
Menthyl anthranilate	0	•	С
Octocrylene	•	•	С
Octyl methoxycinnamate	•	•	С
Octyl salicylate	0	•	С
Oxybenzone	0	•	С
Padimate O	0	•	С
Phenylbenzimidazole	0	•	С
Sulisobenzone	0	•	С
Titanium dioxide	0	•	Р
Trolamine salicylate	0	•	С
Zinc Oxide	•	•	Р

Protection Level: lacktriangle = extensive lacktriangle = considerable lacktriangle = limited lacktriangle = minimal

For the most up-to-date information on approved sunscreen ingredients, visit the FDA Web site at <www.fda.gov>.





# Drug Facts, 3-5 Actives up to 35%



Drug Facts	
Active ingredients	Purpose
Avobenzone 3%	Sunscreen
Homosalate 5%	Sunscreen
Octisalate 5%	Sunscreen
Octocrylene 7%	Sunscreen
Oxybenzone 6%	Sunscreen

combines it with Dry-Touch technology for a lightweight, clean feel.

### **Drug Facts**

#### Active ingredients

Avobenzone 3%, Homosalate 15%, Octisalate 5%, Octocrylene 4,5%, Oxybenzone 6%

#### Purpose

Sunscreen

Uses • helps prevent sunburn • if used as directed with other



# **Drug Facts**



#### **Drug Facts**

Active Ingredients Purpose 8.8% Titanium Dioxide (Non-Nano). Sunscreen

Uses ■ Helps prevent sunburn

Warnings = For external use only = Do not use on damaged or broken skin

#### DRUG FACTS

#### **Active Ingredients**

Purpose

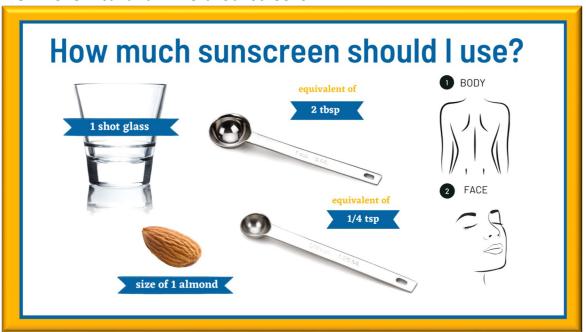
Titanium Dioxide, 6.0%......Sunscreen
Zinc Oxide, 6.0%.....Sunscreen

Uses: Helps prevent sunburn, If used as directed



# Sunscreen Application & Types

**BOTH Chemical and Mineral Sunscreens:** 



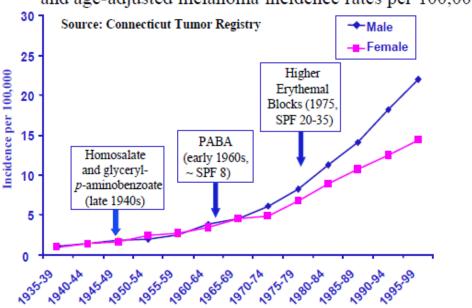






# Sunscreen usage is on the rise

Dates of introduction of suntan lotions and sunscreens and age-adjusted melanoma incidence rates per 100,000





# **UV** Degredation



Journal of Photochemistry and Photobiology A: Chemistry



Volume 332, 1 January 2017, Pages 241-250

Photo-stability and photo-sensitizing characterization of selected sunscreens' ingredients

- Oxybenzone (OXB) is found to be a very stable UV filter.
- Avobenzone (AVOB) is known to be rather unstable UV sunscreen and it photodegrades with time of irradiation.
- Ecamsule (ECAM) is also found to be very photounstable sunscreen and photodegraded with irradiation of UV light.



Environment International
Volume 137, April 2020, 105495



Identification of avobenzone by-products formed by various disinfectants in different types of swimming pool waters

Albert T. Lebedev  $^a$ ,  $^c$   $\overset{\triangle}{\sim}$   $\overset{\triangle}{\sim}$ , Mojca Bavcon Kralj  $^b$ , Olga V. Polyakova  $^a$ , Elena A. Detenchuk  $^a$ , Sergey A. Pokryshkin  $^c$ , Polonca Trebše  $^b$   $\overset{\triangle}{\sim}$   $\overset{\triangle}{\sim}$ 

Cha... ----- . .

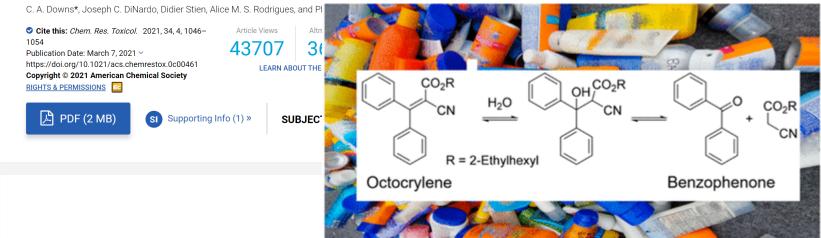


# Octocrylene Degrades into Carcinogen



RETURN TO ISSUE | < PREV ARTICLE NEXT >

### Benzophenone Accumulates over Time from the Degradation of Octocrylene in Commercial Sunscreen Products





# 2019 & 2020 Study Leading to Change

**Preliminary Communication** 

FREE

May 6, 2019

Effect of Sunscreen Application Under Maximal Use Conditions on Plasma Concentration of Sunscreen Active Ingredients

A Randomized Clinical Trial

Murali K. Matta, PhD<sup>1</sup>; Robbert Zusterzeel, MD, PhD, MPH<sup>1</sup>; Nageswara R. Pilli, PhD<sup>1</sup>; et al

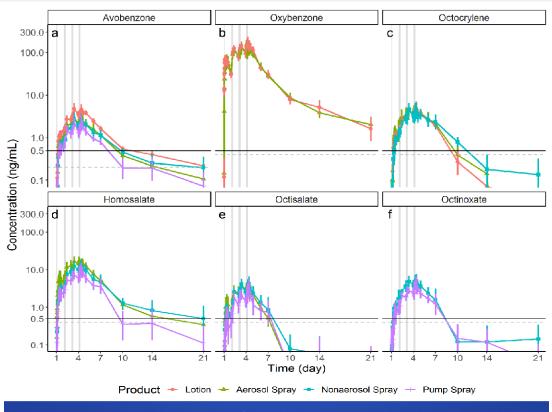
## **Study Results**

Results showed that all four tested ingredients were absorbed into the body at amounts exceeding the FDA threshold of 0.5 nanograms per milliliter (ng/mL), for potentially waiving some additional studies for sunscreens. <sup>2</sup> This threshold for testing the safety of sunscreens active ingredients is based on the principle that the approximate concernicle



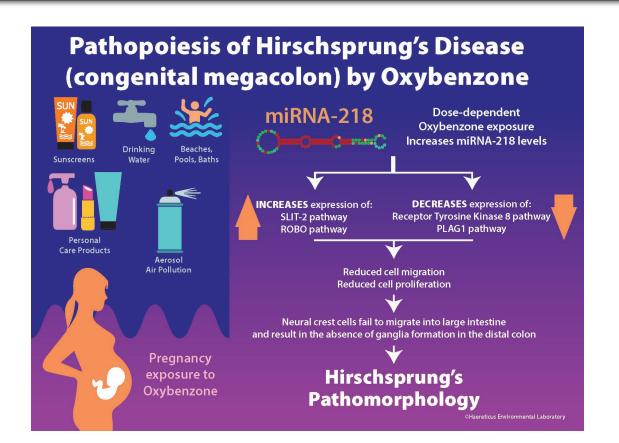
# FDA Maximum Usage Trial (MUsT)

Matta data from 2020 paper: 4 applications a day for 4 days ... no applications made between day 5 and 21.





# Do we need more safety testing?





# CARES Act Makes and Delays Change

- Delayed increasing UVA with increasing SPF
- SPF Towlettes, shampoos are out
- 12 organic actives are allowed to stay on the market

It is now up to industry to prove otherwise – or regulatory to change the monograph.





# Increasing Trends – Improved aesthetics

ppearance on Skin and Particle Size



Formulations containing TiO<sub>2</sub>

7.5% solids





Skin Type I

Skin Type III

Skin Type V CRODA

Percentage of launches (sun care – sun protection) using TiO<sub>2</sub> and/or ZnO, but no organic sunscreens (2015-2019)







\*Mean size by X-Ray Disc Centrifuge

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## **UV Filters in the Environment**

**Question:** What are the chemical properties of the UV filters that may affect their fate in the environment?



# 1000s of studies show that oxybenzone and/or avobenzone/octocrylene are not safe





# **Unsustainable Tourism**





# **UV Filters in the Environement**







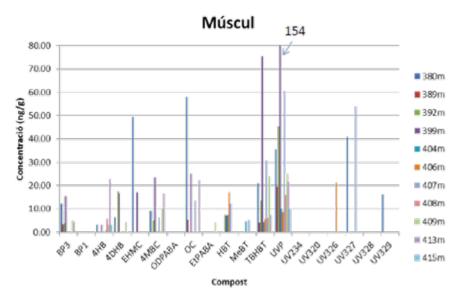






## Bioaccumulation of UV Filters in Fish

#### Muscle Analysis



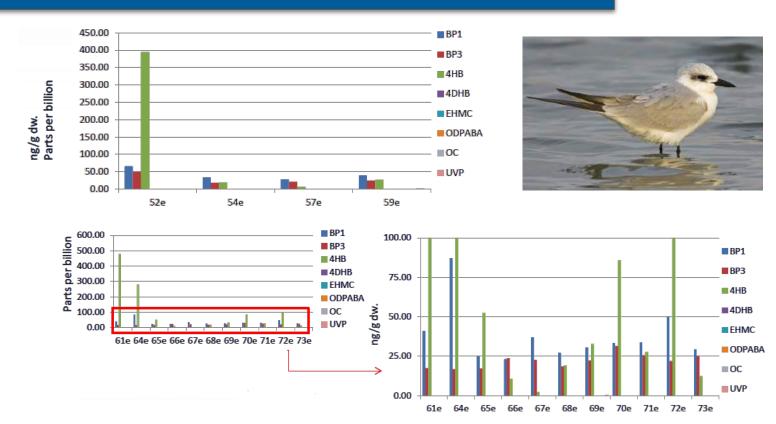
© 2017 Haereticus Environmental Laboratory



BP3 = oxybenzone
BP1, 4HB, & 4DHB = metabolites
of oxybenzone
OC = octocrylene
EHMC = methoxycinnamate



# UV Filters in Eggs of Birds from a Preserved Natural Area





# Sea Turtle Nests



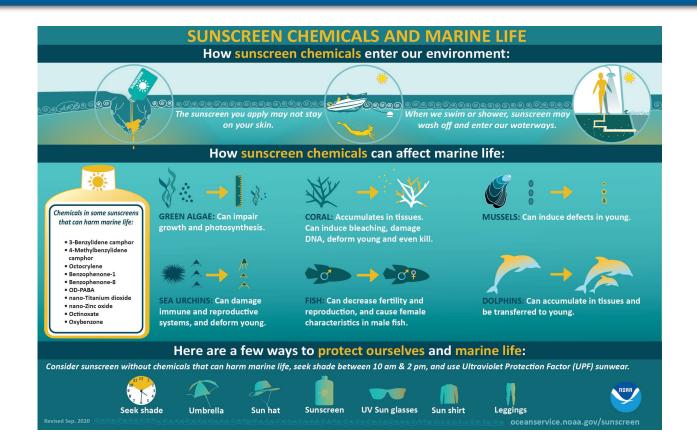








## **UV Filters in the Environement**





# Waterproof?

Question: What is the expected waterproof efficacy and rinse off rate of sunscreen actives?

# **Guidance for Industry**

Labeling and Effectiveness Testing: Sunscreen Drug Products for Over-The-Counter Human Use — Small Entity Compliance Guide

For sunscreen drug products that provide 40 or 80 minutes of water resistance according to the test in 21 CFR 201.327(i)(7):

"Water Resistant ([insert length of time drug product is proven to be water resistant, either 40 minutes or 80 minutes, according to 21 CFR 201.327(i)(7)])"



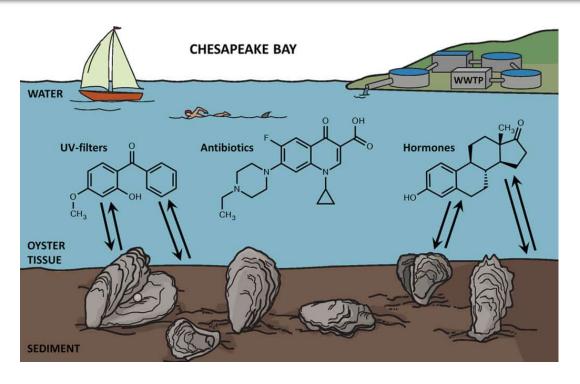
# Sewage



- 30 minutes after application, detect in urine
- Residue on skin, wash off in shower



# Chesapeake Bay

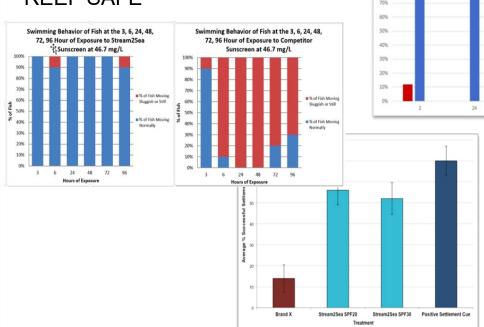


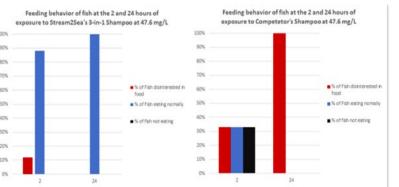
Graphic as appears in Science of the Total Environment <a href="https://www.sciencedirect.com/science/article/abs/pii/S0048969718338944">https://www.sciencedirect.com/science/article/abs/pii/S0048969718338944</a>



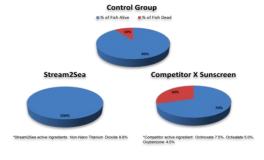
### Test Results – What is reef safe?

Removing banned ingredients does NOT mean a product is REEF SAFE





#### Mortality over the course of 96 hours of testing





# Our reefs need our protection!





Photo on the left of Autumn taken by Frazier Nivens in 2016. On the right taken 5 months later. It is just rubble on the bottom of the ocean today.



# Sunscreen Legislation

Hawaii

January 2021: ban of oxybenzone and octinoxate

Key West

January 2021: ban of oxybenzone and octinoxate

Bonaire

2021: ban of reef-killing sunscreens

Aruba

2020: ban of oxybenzone and octinoxate

Palau

Ban of sunscreen with any of 13 toxic ingredients, enforces fines for vendors

Mexico

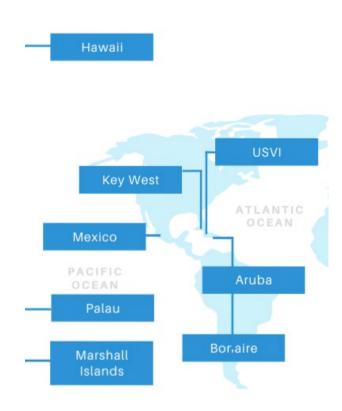
Ecotourism preserves and natural water parks are asking visitors to use only biodegradable sunscreens

17/5/1

In effect: ban of oxybenzone, octinoxate and octocrylene

Marshall Islands

In effect: ban of 28 toxic ingredients & 10 Preservatives, fines enforced for vendors and tourists









REFERENCES, CITATIONS AND DIALOG AVAILABLE UPON REQUEST:

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