



Institute for In Vitro Sciences, Inc.



# Non-Animal Approach To Product Labeling

Presented By

**Anti-Microbials Cleaning Products Team**

**May 11, 2005**

# Overview

**Anti-Microbial Cleaning Products,**  
e.g. Mr. Clean, Febreze, Scrubbing  
Bubbles, Windex Anti-Microbial

**Non-Animal Hazard Evaluation,**  
e.g. formulation analysis, in vitro test  
information

**EPA Labeling Categories,**  
e.g. CAUTION (Toxic Category III  
eye irritant)



Institute for In Vitro Sciences, Inc.



# General Approach

- Subdivide anti-microbial cleaning formulations into smaller categories, according to their expected mechanisms of eye and skin irritation.
- Gather non-animal and animal data for registered (and unregistered) products for each category.
- Conduct additional in vitro testing if needed.
- Factor all parameters into a non-animal approach, and determine its predictive capacity



A close-up photograph of a white microscope, showing the eyepiece and objective lenses. The microscope is positioned on the left side of the slide, partially overlapping the blue background.

# Anticipated Approach

It is anticipated that the final product will be a tiered approach to both eye and skin irritation that would have a similar form to the Globally Harmonized System for skin and eye irritation



A vertical photograph of a white microscope on the left side of the slide. The image shows the eyepiece, objective lenses, and the base of the microscope.

# Estimated Time Frame

- All data, formulation and bucket information submitted and entered into database – Mid April
- Data gaps identified – End April
- Testing agreed to and initiated – Mid May
- First round data analysis – Early June
- Planned testing completed – End June
- Second round data analysis – End July
- Completion of submission document – Mid Sept/mid October



A close-up photograph of a white microscope, showing the eyepiece and objective lenses. The microscope is positioned on the left side of the slide, partially overlapping the blue background.

# Progress

- Decisions made on categories, confidentiality (no data in the submission will be traceable to an individual company) and formulation descriptions.
- Seven companies (Clorox, Colgate Palmolive, Dial, EcoLabs, JohnsonDiversey, P&G and SC Johnson) have submitted ocular data and will assist in the program in various ways.
- Database has been constructed and most of ~330 animal studies (280 with full information), and ~500 in vitro studies (~160 paired with animal data) have been entered by category!

