File No.: LTD/2128

February 2021

# AUSTRALIAN INDUSTRIAL CHEMICALS INTRODUCTION SCHEME (AICIS)

# PUBLIC REPORT

# 2-Butenedioic acid (2*Z*)-, polymer with 2-methoxyethene, calcium zinc salt (INCI Name: Calcium/Zinc PVM/MA Copolymer)

This Assessment has been compiled in accordance with the provisions of the *Industrial Chemicals Act 2019 (the IC Act) and Industrial Chemicals (General) Rules 2019 (the IC Rules) by following the Industrial Chemicals (Consequential Amendments and Transitional Provisions) Act 2019 (the Transitional Act) and Industrial Chemicals (Consequential Amendments and Transitional Provisions) Rules 2019 (the Transitional Rules).* The legislations are Acts of the Commonwealth of Australia. The Australian Industrial Chemicals Introduction Scheme (AICIS) is administered by the Department of Health, and conducts the risk assessment for human health. The assessment of environmental risk is conducted by the Department of Agriculture, Water and the Environment.

This Public Report is available for viewing and downloading from the AICIS website. For enquiries please contact AICIS at:

| Street Address: | Level 7, 260 Elizabeth Street, SURRY HILLS NSW 2010, AUSTRALIA. |
|-----------------|---|
| Postal Address: | GPO Box 58, SYDNEY NSW 2001, AUSTRALIA.                         |
| TEL:            | + 61 2 8577 8800  |
| Email:          | assessments@industrialchemicals.gov.au                          |
| Website:        | www.industrialchemicals.gov.au                                  |

Executive Director AICIS

# TABLE OF CONTENTS

| SUMMARY  |
|--|
| CONCLUSIONS AND REGULATORY OBLIGATIONS             |
| ASSESSMENT DETAILS                                 |
| 1. APPLICANT AND APPLICATION DETAILS               |
| 2. IDENTITY OF CHEMICAL                            |
| 3. COMPOSITION                                     |
| 4. PHYSICAL AND CHEMICAL PROPERTIES 5              |
| 5. INTRODUCTION AND USE INFORMATION 6              |
| 6. HUMAN HEALTH IMPLICATIONS                       |
| 6.1. Exposure Assessment                           |
| 6.1.1. Occupational Exposure7                      |
| 6.1.2. Public Exposure                             |
| 6.2. Human Health Effects Assessment               |
| 6.3. Human Health Risk Characterisation            |
| 6.3.1. Occupational Health and Safety              |
| 6.3.2. Public Health                               |
| 7. ENVIRONMENTAL IMPLICATIONS                      |
| 7.1. Environmental Exposure & Fate Assessment      |
| 7.1.1. Environmental Exposure                      |
| 7.1.2. Environmental Fate                          |
| 7.1.3. Predicted Environmental Concentration (PEC) |
| 7.2. Environmental Effects Assessment              |
| 7.2.1. Predicted No-Effect Concentration11         |
| 7.3. Environmental Risk Assessment                 |
| APPENDIX A: PHYSICAL AND CHEMICAL PROPERTIES       |
| BIBLIOGRAPHY17                                     |

# **SUMMARY**

The following details will be published on the AICIS website:

| ASSESSMENT<br>REFERENCE | APPLICANT(S)                                | CHEMICAL OR<br>TRADE NAME   | HAZARDOUS<br>CHEMICAL | INTRODUCTION<br>VOLUME   | USE                              |
|-------------------------|---|---|-----------------------|--------------------------|----------------------------------|
| LTD/2128                | Procter &<br>Gamble<br>Australia Pty<br>Ltd | 2-Butenedioic acid<br>(2Z)-, polymer with<br>2-methoxyethene,<br>calcium zinc salt<br>(INCI Name:<br>Calcium/Zinc<br>PVM/MA<br>Copolymer) | ND*                   | ≤ 15 tonnes per<br>annum | Component of denture<br>adhesive |

\*ND = Not determined

# CONCLUSIONS AND REGULATORY OBLIGATIONS

# **Hazard Classification**

As no toxicity data were provided, the assessed polymer cannot be classified according to the *Globally Harmonised System of Classification and Labelling of Chemicals* (GHS), as adopted for industrial chemicals in Australia.

# Human Health Risk Assessment

Under the conditions of the occupational settings described, the assessed polymer is not considered to pose an unreasonable risk to the health of workers.

Provided that clear use instructions to consumers are included in labels or leaflets of products containing the assessed polymer, the assessed polymer is not considered to pose an unreasonable risk to public health.

## **Environmental Risk Assessment**

Based on the assumed low environmental hazard of the polymer and the Australian water quality guidelines for zinc, the assessed polymer including its counterions are not considered to pose an unreasonable risk to the environment.

## Recommendations

CONTROL MEASURES

Public Health

- Products containing the assessed polymer available to the public should include the following:
  - To follow instructions provided with the denture adhesive product.
  - The product contains zinc as an ingredient.
  - Not to use more adhesive than recommended.
  - Use directions that will prevent overuse such as graphics of the amount of adhesive to use or the amount of time that a tube should last under correct usage.

Emergency procedures

• Spills or accidental release of the assessed polymer should be handled by physical containment, collection and subsequent safe disposal.

Disposal

• Where reuse or recycling are not appropriate, dispose of the assessed polymer in an environmentally sound manner in accordance with relevant Commonwealth, state, territory and local government legislation.

# **Regulatory Obligations**

#### Specific Requirements to Provide Information

This risk assessment is based on the information available at the time of the application. The Executive Director may initiate an evaluation of the chemical based on changes in certain circumstances. Under Section 101 of the IC Act the applicant of the assessed chemical has post-assessment regulatory obligations to provide information to AICIS when any of these circumstances change. These obligations apply even when the assessed polymer is listed on the Australian Inventory of Industrial Chemicals (the Inventory).

Therefore, the Executive Director of AICIS must be advised in writing within 20 working days by the applicant or other introducers if:

- the use concentration of the assessed polymer exceeds 40% in denture adhesive products;
- the polymer has a number-average molecular weight of less than 1,000 g/mol;
- the function or use of the polymer has changed from a component of denture adhesive, or is likely to change significantly;
- the amount of polymer being introduced has increased, or is likely to increase, significantly;
- the polymer has begun to be manufactured in Australia;
- additional information has become available to the person as to an adverse effect of the polymer on human health, or the environment.

The Executive Director will then decide whether an evaluation of the introduction is required.

## Safety Data Sheet

The SDS of a product containing the assessed polymer provided by the applicant was reviewed by AICIS. The accuracy of the information on the SDS remains the responsibility of the applicant.

# ASSESSMENT DETAILS

# 1. APPLICANT AND APPLICATION DETAILS

APPLICANT(S) Procter & Gamble Australia Pty Ltd (ABN: 91 008 396 245) Level 4, Innovation Road MACQUARIE PARK NSW 2113

APPLICATION CATEGORY Limited: Synthetic polymer with number average molecular weight (Mn)  $\geq$  1,000 g/mol

PROTECTED INFORMATION (SECTION 38 OF THE TRANSITIONAL ACT)

Data items and details exempt from publication include: structural formula, molecular weight, analytical data, degree of purity, polymer constituents, residual monomers, impurities, additives/adjuvants, use details, import volume and identity of manufacturer.

VARIATION OF DATA REQUIREMENTS (SECTION 6 OF THE TRANSITIONAL RULES) Schedule data requirements are varied for all physical and chemical properties except for density and particle size.

PREVIOUS APPLICATION IN AUSTRALIA BY APPLICANT(S) None

APPLICATION IN OTHER COUNTRIES None

# 2. IDENTITY OF CHEMICAL

CHEMICAL NAME 2-Butenedioic acid (2Z)-, polymer with 2-methoxyethene, calcium zinc salt

OTHER NAME(S) Calcium/Zinc PVM/MA Copolymer (INCI name)

CAS NUMBER 133222-51-2

 $\begin{array}{l} Molecular \ Formula \\ (C_4H_4O_4.C_3H_6O)_xxCa.xZn \end{array}$ 

MOLECULAR WEIGHT Number average molecular weight (Mn) is > 10,000 g/mol.

ANALYTICAL DATA Reference IR and GPC spectra were provided.

# 3. COMPOSITION

DEGREE OF PURITY > 80 %

# 4. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AT 20 °C AND 101.3 kPa: solid white powder

| Property                     | Value          | Data Source/Justification            |
|------------------------------|----------------|--------------------------------------|
| Melting Point/Freezing Point | 154 °C         | Glass transition temperature for the |
|                              |                | starting monomer                     |
| Boiling Point                | Not determined | Imported in formulation              |

| Property                                   | Value  | Data Source/Justification   |
|--|--|---|
| Density                                    | 479 kg/m <sup>3</sup> (bulk density)         | Measured  |
|  | 720 kg/m <sup>3</sup> (tapped density, 4,000 |   |
|  | taps)  |   |
| Vapour Pressure                            | Not determined                               | Imported in formulation   |
| Water Solubility                           | Not determined                               | Water dispersible polymer   |
| Hydrolysis as a Function of                | Not determined                               | Does not contain hydrolysable   |
| pH   |  | functionalities   |
| Partition Coefficient<br>(n-octanol/water) | Not determined                               | Not relevant  |
| Adsorption/Desorption                      | Not determined                               | Both the anionic and cationic components                                    |
| Ausorphone Desorphon                       | Not determined                               | of the assessed polymer have potential to<br>partition or sorb to soil      |
| Dissociation Constant                      | Not determined                               | Contains ionisable functionalities with an expected pKa of approximately 4. |
| Particle Size                              | Inhalable fraction (< 100 μm):<br>100%       | Measured  |
|  | Respirable fraction (< 10 $\mu$ m):          |   |
|  | 41.3%  |   |
|  | $VWAD^* = 13 \ \mu m$                        |   |
| Flash Point                                | Not determined                               | Imported in formulation   |
| Autoignition Temperature                   | Not determined                               | Imported in formulation   |
| Explosive Properties                       | 200-250 g/m <sup>3</sup> (Minimum            | Measured  |
|  | Explosible Concentration)                    |   |
| Oxidising Properties                       | Not determined                               | Contains no functional groups that would imply oxidative properties         |

\*VWMD = Volume weighted mean diameter

#### DISCUSSION OF PROPERTIES

For details of tests on physical and chemical properties, refer to Appendix A.

#### Reactivity

The assessed polymer is expected to be stable under normal conditions of use.

#### **Physical Hazard Classification**

Based on the submitted physico-chemical data depicted in the above table, the assessed polymer is not recommended for hazard classification according to the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*, as adopted for industrial chemicals in Australia.

#### 5. INTRODUCTION AND USE INFORMATION

MODE OF INTRODUCTION OF ASSESSED CHEMICAL (100%) OVER NEXT 5 YEARS The assessed polymer will not be manufactured or reformulated in Australia. It will be imported in end-use products at  $\leq 40\%$  concentration.

MAXIMUM INTRODUCTION VOLUME OF ASSESSED CHEMICAL (100%) OVER NEXT 5 YEARS

| Year   | 1         | 2         | 3         | 4   | 5   |
|--------|-----------|-----------|-----------|-----|-----|
| Tonnes | $\leq 10$ | $\leq 10$ | $\leq 10$ | ≤15 | ≤15 |

PORT OF ENTRY Sydney

IDENTITY OF RECIPIENTS Procter & Gamble Australia Pty Ltd

#### TRANSPORTATION AND PACKAGING

The assessed polymer will be imported into Australia as a component of formulated denture adhesive products in tubes/containers suitable for retail sale and then transported by road for distribution to commercial warehouses and retail stores within Australia.

USE

The assessed polymer will be used as a component of denture adhesive at  $\leq 40\%$  concentration.

The assessed polymer at  $\leq 40\%$  concentration will not be manufactured or reformulated in Australia. It will be imported into Australia as a component of denture adhesive products for use by the general public.

# 6. HUMAN HEALTH IMPLICATIONS

## 6.1. Exposure Assessment

# 6.1.1. Occupational Exposure

CATEGORY OF WORKERS

| Category of Worker                      | Exposure Duration (hours/day) | Exposure Frequency (days/year) |
|---|-------------------------------|--------------------------------|
| Transport, warehouse and retail workers | up to 8                       | up to 260                      |

# EXPOSURE DETAILS

Transport, warehouse and retail workers may be exposed to the assessed polymer (at  $\leq 40\%$  concentration) only in the event of accidental rupture of packages.

# 6.1.2. Public Exposure

There will be repeated exposure of the public to the assessed polymer at  $\leq 40\%$  concentration in denture adhesive products. The principal route of exposure will be oral, while accidental dermal and ocular exposure is also possible.

# 6.2. Human Health Effects Assessment

No toxicity data were provided on the assessed polymer. However, the assessed polymer is not expected to be absorbed across biological membranes based on its very high molecular weight (> 10,000 g/mol) and very low percentage (< 1%) of low molecular weight species < 1,000 g/mol.

Zinc is an essential element playing an important role in many processes in the body. However excess exposure to humans over natural background levels can lead to adverse effects mainly related to its ability to induce copper deficiency.

An excess of zinc in the body can lead to health problems such as nerve damage, especially in the hands and feet. This damage appears slowly, over an extended period of time.

The upper limits (UL) of oral zinc intake established by various agencies across the globe were included in the below table.

| Organisation                                     | Established Zinc Upper Level                     |  |
|--|--|--|
| World Health Organization (WHO) (2004)           | UL of 45 mg/day (adult male) (equal to 0.64      |  |
|  | mg/kg/day in a 7 0kg adult)                      |  |
| Agency for Toxic Substances and Disease Registry | Minimal Risk Level of 0.3 mg/kg/day (equal to 18 |  |
| (ATSDR) (2005)                                   | mg/day for a 60 kg adult)                        |  |
| US Environmental Protection Agency (EPA) (2005)  | Reference Dose for Chronic Oral Exposure of 0.3  |  |
|  | mg/kg/day (equal to 18 mg/day for a 60 kg adult) |  |
| Council for Responsible Nutrition (CRN) (2014)   | UL (Supplemental) of 30 mg/day                   |  |
| Expert Group on Vitamins and Minerals (EVM) (UK) | UL (Supplemental) of 25 mg/day                   |  |
| (2003)   |  |  |
| Scientific Committee on Food (SCF) (EU) (2003)   | Tolerable Upper Intake Level of 25 mg/day        |  |
| Institute of Medicine (2001) US                  | Tolerable Upper Intake Level of 40 mg/day        |  |
| Joint FAO/WHO Expert Committee on Food           | Maximum tolerable daily intake of 0.3 - 1 mg/kg  |  |
| Additives (2006)                                 | (equal to 18 - 60 mg/day for a 60 kg adult)      |  |

# Health Hazard Classification

As no toxicity data were provided, the assessed polymer cannot be classified according to the *Globally Harmonised System of Classification and Labelling of Chemicals* (GHS), as adopted for industrial chemicals in Australia.

# 6.3. Human Health Risk Characterisation

The assessed polymer is expected to be of low systemic toxicity due to low absorption through oral mucosa based on the very high molecular weight and very low percentage of low molecular weight species.

# 6.3.1. Occupational Health and Safety

Transport, warehouse and retail workers may be exposed to the assessed polymer (at  $\leq 40\%$  concentration) only if the packages are ruptured. No other worker exposure is expected to the assessed polymer.

Under the conditions of the occupational settings described, the assessed polymer is not considered to pose an unreasonable risk to the health of workers.

# 6.3.2. Public Health

Members of the public may experience repeated exposure to the assessed polymer through the use of denture adhesive containing the assessed polymer at  $\leq 40\%$  concentration. The main route of exposure is expected to be oral, with some potential for dermal or accidental ocular exposure. Although data for the assessed polymer are not available, significant systemic exposure is not expected from use of the assessed polymer in denture adhesive products given the high molecular weight and very low percentage of low molecular weight species < 1,000 g/mol in the assessed polymer limiting dermal absorption.

Estimate of daily Zn exposure from use of denture adhesive products containing the assessed polymer (worst case scenario):

| Average daily use of the denture adhesive product              | 1.5 g (P&G CL2010068)                          |
|--|--|
| Level of assessed polymer in the product                       | $\leq 40\%$                                    |
| Level of zinc in the polymer                                   | < 6%   |
| Systemic availability of Zinc*                                 | $\leq 12.6\%$ (P&G CL2009110 and CL2010123)    |
| *Based on very high molecular weight (> 10,000 g/mol) and very | low percentage of low molecular weight species |

\*Based on very high molecular weight (> 10,000 g/mol) and very low percentage of low molecular weight species < 1,000 g/mol of the assessed polymer, systemic availability of Zinc from denture adhesive products after application by users is expected to be much lower than 12.6%, which is the worst case scenario. Leaching of zinc from the polymer is not expected under normal use conditions.

The maximum worst case zinc exposure level from using denture adhesive products =  $1.5 \text{ g} \times 1,000 \times 40\% \times 6\% \times 12.6\% = 4.54 \text{ mg zinc per day}$ 

This value will be further reduced to 3.14 mg zinc/day if zinc ingestion is 69.3% of maximum daily use as indicated by the applicant (P&G CL2010065).

As the upper limits of oral zinc intake established by various agencies across the globe are 18-60 mg/day (see section 6.2) and the average recommended amounts for adult intake of zinc is reported to be at 11 mg/day for man and 8 mg/day for women (NIH 2020), the maximum zinc exposure level calculated above from using denture adhesive products containing the assessed polymer at  $\leq 40\%$  concentration is not considered to pose an unreasonable risk to public health.

Overuse of zinc-containing denture adhesives, especially when combined with dietary supplements containing zinc and other sources of zinc, can contribute to an excess of zinc in human body (FDA 2018).

The FDA was aware of case reports in the medical literature linking negative reactions such as nerve damage, numbness or tingling sensations in users of denture adhesives that contain zinc with chronic overuse of those products. The FDA also received reports of adverse events linked to use of denture adhesives. While some product instructions indicated that one tube should last seven to eight weeks, the subjects of the negative case reports had used at least two tubes of zinc-containing denture adhesive each week. The FDA had not found conclusive evidence that these problems resulted from using zinc-containing denture adhesive as instructed in the product labelling (FDA, 2018).

To help address any potential risks to public from overuse of zinc-containing denture adhesives, introducers of zinc-containing denture adhesives into Australia should consider:

- Including safety directions on denture adhesive product labels to prevent overuse of products containing zinc.

- Product labels should indicate that zinc is present as an ingredient in the adhesive product.

Provided that clear instructions to consumers as indicated above are included in labels or leaflets of products containing the assessed polymer, the assessed polymer is not considered to pose an unreasonable risk to public health.

# 7. ENVIRONMENTAL IMPLICATIONS

# 7.1. Environmental Exposure & Fate Assessment

# 7.1.1. Environmental Exposure

# RELEASE OF CHEMICAL AT SITE

The assessed polymer will not be manufactured or reformulated in Australia. The assessed polymer will only be imported as a component of finished denture adhesive products. There is unlikely to be any significant release to the environment from transport and storage, except in the case of accidental rupture of packages. In the event of spills, the product containing the assessed polymer is expected to be collected with inert material and disposed of to landfill in accordance with local government regulations.

## RELEASE OF CHEMICAL FROM USE

The assessed polymer will be primarily washed into the sewers during use of denture adhesive product.

# RELEASE OF CHEMICAL FROM DISPOSAL

Wastes and residues of the assessed polymer in empty end-use containers (1-2% of the total volume estimated by the applicant) are likely to either share the fate of the container and be disposed of to landfill, or be released to sewer when packaging is rinsed before recycling through an approved waste management facility.

# 7.1.2. Environmental Fate

Following its use in denture adhesives, the majority of the assessed polymer will enter the sewers and be treated at sewage treatment plants (STPs) before the potential release to surface waters nationwide.

The assessed polymer is a mixed salt and expected to ionise and exchange ions with potential release of cationic metals in the STPs. The anionic component of the assessed polymer is expected to be partially removed via partitioning to the sludge based on removal rates of high molecular weight anionic polymers in wastewater treatment tests (Boethling and Nabholz, 1997). The distribution of released metals (zinc) between solution and solid phases is related to the pH, nature and concentration of complexing agents, sludge age, treatment methods and other factors. Reported zinc removal rates by activated sludge, trickling filter and membrane bioreactor sludge are in the range between 30 and 99% (Santos et al., 2010).

A proportion of the assessed polymer may be applied to land when effluent is used for irrigation or when sewage sludge is used for soil remediation, or disposed of to landfill. In surface water, soils or landfill, the anionic component of the assessed polymer is not expected to bioaccumulate based on its high molecular weight and will slowly degrade through biotic and abiotic processes to form water and oxides of carbon.

The cationic component, zinc, is an essential element needed by organisms. Aquatic organisms are known to bioconcentrate zinc from water. The concentration at which zinc is homoeostatically regulated is species-specific and the external zinc concentration at which regulation breaks down depends on both intrinsic (e.g., species) and extrinsic (e.g., temperature, pH and presence of other metals) factors. Accumulation of zinc to meet physiological requirements can be mistaken for trophic transfer, however, zinc is not biomagnified (WHO, 2001).

# 7.1.3. Predicted Environmental Concentration (PEC)

## Aquatic compartment

The predicted environmental concentration (PEC) has been calculated to assume a worst-case scenario, with 100% release of the assessed polymer into sewer systems nationwide and no removal within sewage treatment plants (STPs).

| Predicted Environmental Concentration (PEC) for the Aquatic Compartment |        |              |
|---|--------|--------------|
| Total Annual Import/Manufactured Volume                                 | 15,000 | kg/year      |
| Proportion expected to be released to sewer                             | 100%   |              |
| Annual quantity of chemical released to sewer                           | 15,000 | kg/year      |
| Days per year where release occurs                                      | 365    | days/year    |
| Daily chemical release:   | 41.10  | kg/day       |
| Water use   | 200.0  | L/person/day |
| Population of Australia (Millions)                                      | 24.386 | million      |
| Removal within STP  | 0%     |              |
| Daily effluent production:  | 4,877  | ML           |
| Dilution Factor – River   | 1.0    |              |
| Dilution Factor – Ocean   | 10.0   |              |
| PEC - River:  | 8.43   | μg/L         |
| PEC - Ocean:  | 0.84   | μg/L         |

The worst-case release of the assessed polymer is 8.43 and 0.84  $\mu$ g/L in river and marine water (see above), corresponding to < 0.51 and < 0.05  $\mu$ g/L zinc in river and marine water based on Zn being < 6% of the weight of the starting material.

# Soil compartment

The assessed polymer may be also released into soils as a result of application of biosolids to agricultural soils. The predicted environmental concentration (PEC) in biosolids has been calculated to assume a worst-case scenario, with 100% removal rate of cationic and anionic components of the assessed polymer within sewage treatment plants (STPs). Under this scenario, partitioning to biosolids in STPs Australia-wide may result in an average biosolids concentration of 84,261  $\mu$ g/kg (dry wt.) of assessed polymer corresponding to 5,056  $\mu$ g/kg zinc which is a function of the quantity of effluent and dry weight volume of biosolids production, 100 kg/ML effluent. Biosolids are applied to agricultural soils, with an assumed average rate of 10 t/ha/year. Assuming a soil bulk density of 1,500 kg/m<sup>3</sup> and a soil-mixing zone of 10 cm, the concentration of the assessed polymer may approximate 562  $\mu$ g/kg of assessed polymer (< 33.7  $\mu$ g/kg of zinc) in applied soil. Assuming accumulation of the assessed polymer in the applied soil in 5 and 10 years may approximate 2,809  $\mu$ g/kg polymer (< 169  $\mu$ g/kg zinc) and 5,617  $\mu$ g/kg (ci 337  $\mu$ g/kg zinc), respectively.

Re-use of STP effluent for irrigation purposes will result in significantly lower concentration in biosolids than direct application of biosolids to agricultural soils.

# 7.2. Environmental Effects Assessment

The anionic component of the assessed polymer is expected to show low toxicity across three trophic levels. Anionic polymers are generally of low toxicity to fish and daphnia, however they are known to be moderately toxic to algae. The mode of toxic action is over-chelation of nutrient elements needed by algae for growth. The highest toxicity is when the acid is on alternating carbons of the polymer backbone, leading to chelation of essential nutrients (Boethling and Nabholz, 1997). This is not the case with the assessed polymer, which should have a lower toxicity. In addition, when enough calcium is added to a polymer to satisfy its anionic charges, algal toxicity is observed to be mitigated.

A small proportion of released zinc may be bioavailable to aquatic organisms and the toxicity of the assessed polymer may be attributed to the cationic component (zinc). Generally, zinc bioavailability and toxicity is affected by biotic and abiotic factors including organism age and size, water hardness, pH, cationic exchange capacity, dissolved organic carbon and temperature (WHO, 2001). Zinc in ionic form may be very toxic to aquatic life. However, zinc ionic forms are not expected to be present in significant amounts, in the natural environment, therefore, the ANZECC/ARMCANZ (2000) guideline limits for zinc in surface waters for ecosystem protection will be considered as more representative for risk characterisation purposes.

Therefore, the assessed polymer is not formally classified under the *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)* (United Nations, 2009) for acute and chronic toxicity. The assessed polymer is expected to release metals which may transform to other chemical compounds under the environmental conditions.

# 7.2.1. Predicted No-Effect Concentration

The predicted No-Effect Concentrations has not been calculated for the anionic component of the assessed polymer due to expected low toxicity.

For the zinc counterion, the ANZECC/ARMCANZ (2000) Water Quality Guideline (WQG) limit for zinc in surface waters for ecosystem protection is 8  $\mu$ g/L in freshwater (at a hardness of 30 mg CaCO<sub>3</sub>/L) and 15  $\mu$ g/L in marine environment.

# 7.3. Environmental Risk Assessment

The anionic component of the assessed polymer is not expected to reach ecotoxicologically significant concentrations in the aquatic and soil environment. The anionic component of the assessed polymer has a low potential for bioaccumulation and is likely to biodegrade slowly in surface waters or soils.

The contribution of the assessed polymer as an anthropogenic source of zinc, at the proposed import volume and use pattern, has been compared to Australian water quality guideline limits. At the proposed use patterns the assessed polymer may lead to the maximum predicted environmental concentrations in surface waters of 0.51  $\mu$ g/L zinc which is significantly lower than WQG guideline limit for zinc in surface waters. Background zinc concentrations in Australian surface waters have been reported as 0.9  $\mu$ g/L in fresh water (ANZECC/ARMCANZ, 2000). The release of zinc from the use of the assessed polymer in Australia is not expected to significantly increase the background concentration of this element in environmental waters.

Background zinc concentrations in Australian soils range 1-263 mg/kg, with a calculated median background zinc concentration in soil of 39 mg/kg (Berkman, 1989). At the proposed use pattern, assuming 100% removal rate of zinc by sludge, may lead to < 0.34 mg/kg increase in zinc concentrations in agricultural soils over a 10 year period due to the application of biosolids. This represents a 0.87% increase with respect to the median background concentration. Therefore, the contribution of the assessed polymer as an anthropogenic source of zinc is not expected to result in a significant increase to the concentration of zinc in soils with respect to background values. Similarly, the concentration of zinc in sediment will be dependent on its fate and behaviour in the whole aquatic system including the overlying water and no significant increase in environmental levels of zinc, in sediment is expected.

Therefore, the assessed polymer including its counterions are not considered to pose an unreasonable risk to the environment, based on the assumed low environmental hazard of the polymer and the Australian water quality guidelines for zinc.

# **APPENDIX A: PHYSICAL AND CHEMICAL PROPERTIES**

| Density           | 479 kg/m <sup>3</sup> (bulk density)<br>720 kg/m <sup>3</sup> (tapped density, 4,000 taps)   |  |
|-------------------|--|--|
| Method            | In house method.   |  |
| Remarks           | Density is calculated as mass/volume and obtained by adding a known mass of chemical powder to a graduated cylinder. Tapped density is obtained by tapping a graduated cylinder containing the powder sample until little further volume change is observed. |  |
| Test Facility     | P & G (done on 22 April 2020)  |  |
| Particle Size     |  |  |
| Method            | In house method.   |  |
|                   | Range (µm) Mass (%)  |  |
|                   | < 100 100  |  |
|                   | < 10 41.3  |  |
| Volume weighted 1 | mean diameter = $13.013 \ \mu m$   |  |
| Remarks           | Laser light scattering on Malvern 2000 particle sizer was used.  |  |
| Test Facility     | P & G (2019)   |  |
| Explosive Prope   | rties 200-250 g/m <sup>3</sup> (Minimum Explosible Concentration)  |  |
| Method            | In house method  |  |
| Remarks           | Remarks Determination of explosive properties by using the Dust Explosibility Classification Test.   |  |

| Determination of explosive properties by using the Dust Explosibility Classification Test. |
|--|
| The material was further evaluated in terms of Ignition Sensitivity included Minimum       |
| Ignition Temperature (MIT) determinations.   |
| Dekra Insight (2017)   |
|  |

# **APPENDIX B: TOXICOLOGICAL INVESTIGATIONS**

# B.1. Plasma Zinc Following Oral Application of Denture Adhesive

| TEST SUBSTANCE               |  | Fixodent denture adhesive cream (containing 16.67 mg zinc/g cream)  |
|------------------------------|--|---|
| Metho<br>Rer                 | DD<br>narks – Method                         | Eleven out of 13 healthy male adult subjects completed the study after receiving a single oral dose of 3 g or 6 g of Fixodent denture adhesive cream containing approximately 50 mg and 100 mg of zinc, respectively. Subjects received Galzin (zinc acetate containing 50 mg zinc) as a positive control. In addition to plasma zinc, plasma copper and serum ceruloplasmin were analysed. Pharmacokinetic parameters for plasma zinc included area under the plasma concentration versus time curve (AUC <sub>0-24</sub> ), maximum plasma concentration ( $C_{max}$ ) and time at which maximum plasma concentration was noted ( $t_{max}$ ). Plasma zinc was analysed using both baseline uncorrected and baseline corrected data. Baseline uncorrected data were plasma measurements including both the endogenous levels of plasma zinc and exogenous contributions to plasma zinc. Baseline corrected data accounted and corrected for endogenous levels of plasma zinc, to allow for the accurate evaluation of changes in plasma zinc due to treatments. |
| RESULTS<br>Remarks – Results |  | There were no mortalities and no serious adverse events reported during the study. No changes were observed in test subjects for plasma copper or serum ceruloplasmin, compared to the baseline values.<br>The $t_{max}$ for both denture adhesive cream and zinc acetate occurred at   |
|                              |  | approximately 2 h. Fifty mg zinc as denture adhesive cream showed a $C_{max}$ that was 12% that of 50 mg zinc as zinc acetate. The dose of 100 mg zinc as denture adhesive cream showed a $C_{max}$ that was 17.6% of 50 mg zinc as zinc acetate. The relative $C_{max}$ would be 8.8% considering that 100 mg zinc as denture adhesive cream contained double the amount of zinc as the zinc acetate control.  |
|                              |  | Fifty mg of zinc as denture adhesive cream showed an $AUC_{0.24}$ that was 12.6% of 50 mg zinc as zinc acetate. The dose of 100 mg zinc as denture adhesive cream showed an $AUC_{0.24}$ that was 16.8% of 50 mg zinc as zinc acetate. The relative bioavailability would be 8.4% considering that 100 mg zinc as denture adhesive cream contained double the amount of zinc as the zinc acetate control.   |
|                              |  | The time of maximum zinc concentration $(t_{max})$ was similar between the Fixodent groups (3 g and 6 g) and zinc acetate, approximately 2 hours after application. The systemic exposures to zinc from Fixodent 6 g were not much greater than Fixodent 3 g even though the 6 g product had twice the amount of elemental zinc (100 mg versus 50 mg) relative to the 3 g product.  |
| CONCL                        | USION  | Lower systemic exposure to zinc from both doses of Fixodent product relative to Galzin after a single oral application was reported.  |
| TEST F.                      | ACILITY                                      | CL 2009110 (2010)   |
|                              | Clinical Study to Asso<br>Denture Population | ess Denture Fit and Adhesive Consumption Habits among Complete  |

METHOD

| Remarks – Method  | Kapur method for scoring denture retention and stability was used among 375 subjects of adult denture adhesive users (at least 3 days per week). Only 300 subjects who met all inclusion/exclusion criteria and completed the study. Subjects were given denture adhesive product and written instructions for use at home for two weeks. The weight of the denture adhesive tube was recorded before and after use. Kapur score was from 0 to 3 where sum score is poor for < 3, fair for 3-4 and good for > 4. Results were measured for all subjects (314), including subjects with maxillary and mandibular dentures (167) and subjects with only maxillary dentures (143). |  |  |  |
|---|---|--|--|--|
| RESULTS   |   |  |  |  |
| Remarks – Results   | The mean (median) amount of denture adhesive used per day was $1.34 (1.12)$ g among all study participants (314), with 1.54 (1.33) g among those with both maxillary and mandibular dentures (167) and 1.14 (0.94) g among participants with maxillary dentures only (143).   |  |  |  |
|   | The mean (median) number of adhesive applications per day was 1.33 (1.0) times among all study participants, with 1.44 (1.1) times among those with both maxillary and mandibular dentures and $1.20 (1.0)$ times among participants with maxillary dentures only.  |  |  |  |
|   | The mean (median) amount of denture adhesive used per application was $1.10$ (0.93) g among all study participants, with $1.18$ (1.02) g among those with both maxillary and mandibular dentures and $1.02$ (0.85) g among participants with maxillary dentures only.   |  |  |  |
| CONCLUSION  | The denture adhesive was found to be well tolerated.  |  |  |  |
| TEST FACILITY   | CS 2010068 (2010)   |  |  |  |
| B.3. Study to Assess the In-Situ Retention of a Marketed Cream Denture Adhesive |   |  |  |  |

# TEST SUBSTANCEFixodent denture adhesive cream (containing Zn at 1.74%)METHOD<br/>Remarks – MethodFifty adult denture wearers having complete maxillary and mandibular dentures<br/>were regular adhesive users (at least three times a week up to five days per week<br/>and up to 13 hours usage per day) for this study. Subjects used the product five<br/>times over the course of 5 days. At the completion of each product usage, the<br/>subjects' maxillary and mandibular dentures were removed and any retained<br/>denture adhesive was collected from both the dentures and the subjects' denture<br/>bearing area. The collected denture adhesive was weighed and analysed for zinc.<br/>Denture fit was determined using the Kapur scale method.

| Weight of Adhesive Applied (mg) Summary |              |             |             |  |
|---|--------------|-------------|-------------|--|
| Measure                                 | Overall      | Maxillary   | Mandibular  |  |
| Mean $\pm$ SD                           | $917\pm 648$ | $509\pm380$ | $404\pm295$ |  |
| MinMax.                                 | 51 - 3,902   | 11-2,420    | 40 - 1,747  |  |
| Median                                  | 756          | 414         | 318         |  |

Percent of soluble zinc recovered was calculated from the dentures and the denture bearing surfaces, using the following formula:  $100\% \times (zinc concentration of recovered sample \times weight of adhesive recovered) divided by (zinc concentration of applied adhesive \times weight of applied adhesive).$ 

# RESULTS

Remarks – Results

The dry weight of recovered denture adhesive was 543 mg, 426 mg, 366 mg, 305 mg and 267 mg at 1 h, 4 h, 7 h, 10 h, and 13 h post-denture insertion

|               | respectively for maxillary and mandibular dentures combined. The percent of recovered denture adhesive out of applied dose was 62.0%, 46.8%, 37.8%, 28.8% and 25.9% at 1 h, 4 h, 7 h, 10 h, and 13 h post-denture insertion respectively for maxillary and mandibular dentures combined. |
|---------------|--|
|               | The percent of soluble zinc recovered from the denture adhesive was 64.7%, 53.3%, 44.3%, 33.7% and 30.7% at 1 h, 4 h, 7h, 10 h, and 13 h post-denture insertion respectively for maxillary and mandibular dentures combined.   |
| CONCLUSION    | There were no adverse events reported during the study.  |
| TEST FACILITY | CL 2010065 (2011)  |
|               |  |

# B.4. Systemic availability of Zinc from 6 grams of Fixodent Denture Adhesive

| TEST SUBSTANCE               | Fixodent Free denture adhesive (containing 16.67 mg zinc/g cream)   |
|------------------------------|---|
| METHOD<br>Remarks – Method   | Nineteen out of 20 healthy men and postmenopausal women subjects completed the study after receiving a single oral application of 6 g of Fixodent denture adhesive relative to a 25 mg zinc acetate capsule as Galzin. There were 2 application periods with one washout, 7 days apart. All subjects received a diet with a calculated value of less than 10 mg of zinc and less than 1 mg copper per day.  |
|                              | Subjects provided blood samples for Pharmacokinetics (PK) analysis of zinc plasma levels at the following time points in each dosing period:  |
|                              | <ul> <li>Day -1: approximately 24 hours prior to dosing on day 1 (time 0 on day -1) and 0.5, 1, 1.5, 2, 2.5, 3, 4, 5, 6, 7, and 8 hours following time 0;</li> <li>Day 1: pre-dose (time 0 on Day 1) and 0.5, 1, 1.5, 2, 2.5, 3, 4, 5, 6, 7, and 8 hours following dosing.</li> <li>The following PK parameters for both baseline uncorrected and baseline corrected zinc were calculated using non-compartmental analysis in WinNonlin v5.1.1:</li> <li>Area under the plasma concentration versus time curve (AUC<sub>0-8</sub>);</li> <li>Maximum plasma concentration (C<sub>max</sub>);</li> <li>Time at which maximum plasma concentration being noted (t<sub>max</sub>);</li> <li>Descriptive statistics were calculated for zinc concentrations (both baseline uncorrected and baseline corrected) by time and treatment. Maximum concentration (C<sub>max</sub>) and time to maximum concentration (t<sub>max</sub>) were obtained by direct observation. AUC<sub>0-8</sub> was obtained by linear trapezoidal approximation of the concentration-time data. In addition, individual subject PK parameter ratios for C<sub>max</sub> and AUC<sub>0-8</sub> were calculated for each subject to evaluate exposures from the Fixodent treatment relative to the zinc acetate treatment.</li> </ul> |
| RESULTS<br>Remarks – Results | There were no mortalities, serious adverse events or withdrawals due to an adverse event during the period of the study. All events reported were assessed as mild in severity by the study authors.  |
|                              | There were no adverse events reported based on clinical laboratory or clinically significant changes in laboratory evaluations.   |
| Conclusion                   | The dose-adjusted relative systemic availability of zinc based on AUC0 <sub>-8</sub> was 19.3% (baseline uncorrected) and 9.8% (baseline corrected) for Fixodent 6 g containing 100 mg elemental zinc relative to Galzin. The mean time to  |

maximum concentration  $(t_{max})$  for zinc was about 2-3 hours across both treatments for both baseline uncorrected and baseline corrected zinc.

The results from the current study were consistent with the study 2009110 and showed low systemic availability for zinc from the Fixodent product relative to Galzin after single oral doses.

TEST FACILITY

CL 2010123 (2011)

# **BIBLIOGRAPHY**

- ANZECC & ARMCANZ (Australian and New Zealand Environment and Conservation Council and Agriculture and Resource Management Council of Australia and New Zealand) (2000). *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*.
- ASTDR (2005), ToxGuide for Zin, U.S. Department of Health and Human Services Public Health Service Agency for Toxic Substances and Disease Registry, August 2005. https://www.atsdr.cdc.gov/toxguides/toxguide-60.pdf
- Berkman, D. A. (Donald Alexander) & Australasian Institute of Mining and Metallurgy (1989). *Field geologists'* manual (3rd ed). Australasian Institute of Mining and Metallurgy, Parkville, Vic. Boethling, RS & Nabholz VJ (1997) Environmental Assessment of polymers under the U.S. Toxic Substances Control Act. In: Hamilton, JD Sutcliffe R ed. Ecological Assessment of Polymers Strategies for Product Stewardship and Regulatory Programs, 1<sup>st</sup> ed. New York, Van Nostrand Reinhold, pp 187-234.
- Boethling, RS & Nabholz VJ (1997) Environmental Assessment of polymers under the U.S. Toxic Substances Control Act. In: Hamilton, JD Sutcliffe R ed. Ecological Assessment of Polymers Strategies for Product Stewardship and Regulatory Programs, 1<sup>st</sup> ed. New York, Van Nostrand Reinhold, pp 187-234.
- P&G CL2010068 (2010) A Clinical Study to Assess Denture Fit and Adhesive Consumption Habits Among Complete Denture Population, Final Report (Study Number 2010068, July, 2010). Mason Business Center, 8700 Mason-Montgomery Road, Mason, OH USA 45040, The Procter & Gamble Company, 12 July 2010.
- P&G CL2010065 (2011) A Study to Assess the In-Situ Retention of a Marketed Cream Denture Adhesive, Final Report (Study Number 2010065, April, 2011). Mason Business Center, 8700 Mason-Montgomery Road, Mason, OH USA 45040, The Procter & Gamble Company, 20 April 2011.
- P&G CL2010123 (2011), A Randomized, Open-label, Single-dose, 2-period, Crossover Study to Assess the Bioavailability of Zinc from 6 grams of Fixodent Denture Adhesive Relative to a 25 mg Zinc Acetate Capsule Administered as a Single Oral Bolus Dose in Healthy Volunteers, Final Report (Study Number 2010123, April, 2011). Mason Business Center, 8700 Mason-Montgomery Road, Mason, OH USA 45040, The Procter & Gamble Company, 11 April 2011.
- P&G CL2009110 (2010) A Randomized, Open-label, Single-dose, Controlled, Three-period Study to Assess Plasma Zinc Following Oral Dosing of Denture Adhesive Containing 50 mg or 100 mg Zinc Compared to Zinc Acetate in Healthy Male Subjects, Final Report (Study Number 2009110, July, 2010). Mason Business Center, 8700 Mason-Montgomery Road, Mason, OH USA 45040, The Procter & Gamble Company, 16 July 2010.
- Council for Responsible Nutrition (CRN) (2014), Zinc. Vitamin and Mineral Safety 3rd Edition (2014) CouncilforResponsibleNutrition(CRN)www.crnusa.orghttps://www.crnusa.org/sites/default/files/files/resources/CRN-SafetyBook-3rdEdition-2014-fullbook.pdf
- Dekra (2017) Ignition Sensitivity and Dust Cloud Explosion Testing (study Number PR19380RP, June 2017). Chilworth Technology, Inc., 113 Campus Drive, Princeton, NJ 08540, DEKRA Insight (Unpublished report submitted by the applicant).
- Expert Group on Vitamins and Minerals (EVM), Committee on Toxicity (2003). Safe Upper Levels for VitaminsandMinerals.London:FoodStandardsAgencyPublications,see<a href="https://cot.food.gov.uk/sites/default/files/vitmin2003.pdf">https://cot.food.gov.uk/sites/default/files/vitmin2003.pdf</a>.
- FDA (2018), Denture Adhesives. U.S. Food and Drug Administration (9 April 2018). https://www.fda.gov/medical-devices/dental-devices/denture-adhesives
- IoM (2001), Food and Nutrition Board, 2001. Dietary ReferenceIntakes for Vitamin A, Vitamin K, Arsenic, Boron, Chromium,Copper, Iodine, Iron, Manganese, Molybdenum, Nickel, Silicon,Vanadium, and Zinc. Standing Committee on the Scientific Evaluation of Dietary Reference Intakes. Food and Nutrition Board, Institute of Medicine, 2001. National Academy Press, Washington, DC, USA, <u>see</u> <u>https://www.ncbi.nlm.nih.gov/books/NBK222310/</u>.
- Joint FAO/WHO Expert Committee on Food Additives (2006). Safe upper intake levels for vitamins and minerals, 26.09.2006, <u>see</u> https://apps.who.int/iris/bitstream/handle/10665/41546/WHO\_TRS\_683.pdf;jsessionid=C49B3A491DAE4C

https://apps.who.int/iris/bitstream/handle/10665/41546/WHO\_TRS\_683.pdf;jsessionid=C49B3A491DAE4C A13DCA374D33A54887?sequence=1.

- Scientific Committee on Food (SCF) Opinion (EU) (2003). Safe Upper Intake Levels for Vitamins and Minerals. SCF (2003). Adopted 5 March 2003. https://ec.europa.eu/food/sites/food/files/safety/docs/labelling\_nutrition-supplements-responses-denmark\_annex2\_en.pdf
- United Nations (2009) Globally Harmonised System of Classification and Labelling of Chemicals (GHS), 3rd revised edition. United Nations Economic Commission for Europe (UN/ECE), see <a href="http://www.unece.org/trans/danger/publi/ghs/ghs">http://www.unece.org/trans/danger/publi/ghs/ghs</a> rev03/03files e.html
- US EPA (2005), Zinc and Compounds. Integrated Risk Information System (IRIS) U.S. Environmental Protection Agency. 08 March 2005. <u>see</u> <u>https://cfpub.epa.gov/ncea/iris/iris\_documents/documents/subst/0426\_summary.pdf</u>
- WHO (World Health Organization) (2001) Environmental Health Criteria 221 Zinc. Geneva, World Health Organization. Available at http://www.who.int/ipcs/publications/ehc/en/221\_Zinc\_Part\_1.pdf.
- WHO (World Health Organization) (2004) Vitamin and mineral requirements in human nutrition Geneva, World Health Organization. Available at https://apps.who.int/iris/bitstream/handle/10665/42716/9241546123.pdf.