



WOMEN'S VOICES FOR THE EARTH

OUR HEALTH. OUR FUTURE. TOXIC FREE.

December 2, 2020

To the CIR,

Please accept these comments on the safety assessment of **acetyl Hexapeptide-8 Amide** from Women's Voices for the Earth.

The CIR's safety assessment of acetyl Hexapeptide-8 Amide appears to be missing a discussion of a major cosmetic use of acetyl Hexapeptide-8 Amide. There is no mention in the document of acetyl Hexapeptide-8 Amide as the active ingredient in anti-wrinkle serums, which are cosmetic products (available at popular retailers) which contain significantly higher concentrations of this chemical than the assessment states. We are concerned that the Discussion states that concern over the lack of systemic toxicity and detailed genotoxicity data was mitigated by the fact that this chemical has a low maximum use concentration of .005% in leave-on cosmetic products (as reported in the VCRP). It is well-known that wrinkle serums frequently contain 10-30% concentrations of acetyl Hexapeptide-8 Amide.

One of the most popular uses of acetyl Hexapeptide-8 Amide in cosmetics (more popularly known by its trade name Argireline) is anti-wrinkle serums – frequently advertised as a Botox alternative (most famously by Dr. Oz). This ingredient is commonly written up in fashion/beauty articles and blogs as an effective wrinkle reducer.

Here are some articles that demonstrate this:

“Argireline Is the Anti-Aging Skincare Ingredient You Didn't Know You Needed. It's nicknamed “Botox in the jar.”

<https://www.health.com/beauty/the-ordinary-argireline-serum>

“Dermatologists Say Argireline Basically Performs Just Like Botox: In case you'd rather avoid needles.”

<https://www.byrdie.com/argireline-for-skin-4771349>

“Does Argireline Work? We Asked Skin Experts About This 'Botox in a Jar'”

<https://sa1s3.patientpop.com/assets/docs/46054.pdf>

Examples of wrinkle serums which contain high concentrations of acetyl Hexapeptide-8 Amide:

Argireline serum (10% concentration) sold by Ulta Beauty:

<https://www.ulta.com/argireline-solution-10?productId=pimprod2009237>

The same product also sold at Sephora:

<https://www.sephora.com/product/argireline-solution-10-P442753>

Here's a product claiming 30% concentration of Argireline sold at Walmart:

<https://www.walmart.com/ip/iQ-Natural-Argireline-Wrinkle-Fine-Line-Serum-30-Lipotec-Argireline-Matrixyl-3000-Hyaluronic-Acid-Plump-Lines-Relax-Deeper-Facial-Wrinkles-Induce-Col/643838653>

Here's one with 20% concentration of Argireline available from Amazon:

<https://www.amazon.com/Ultimate-Facelift-Argireline-Matrixyl-Collagen/dp/B0117R8VQO>

In the CIR report under "Clinical Studies" there are descriptions of two studies measuring the effects of topical application of 10% Acetyl hexapeptide-8 amide (one which found it was effective at reducing wrinkles). It doesn't make sense for the CIR to claim this ingredient is only used in products at no more than .005%, when it acknowledges that there are manufacturers conducting studies of its impact in products with a 10% concentration. Given the popularity and availability of these products, and the claims being made by their manufacturers, the CIR should address this issue in their assessment.

Thanks for your consideration of these comments.

A handwritten signature in black ink, appearing to read "Alexandra Scranton". The signature is written in a cursive style and is positioned above the typed name.

Alexandra Scranton
Director of Science and Research
Women's Voices for the Earth