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4 **Reflection paper on the use of methyl- and propylparaben**  
5 **as excipients in human medicinal products for oral use.**  
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7 **DRAFT**  
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## 31 **1. Introduction**

32 The European Commission has decided to revise the “Guideline on excipients in the label and package  
33 leaflet of medicinal products for human use (CPMP/463/00 Rev.1)” and a concept paper on the need  
34 for such revision has been published in 2012 (EMA/CHMP/SWP/888239/2011). Parabens used in  
35 medicinal products is one of the priorities among excipients under revision.

36 Parabens are currently listed in the guideline on excipients in the label and package leaflet of medicinal  
37 products for human use (CPMP/463/00 Rev.1) for their allergic potential. Further safety concerns have  
38 been raised during the last decade by the scientific community, regulatory agencies and the general  
39 public as a consequence of possible endocrine-disrupting effects (Darbre et al, 2004).

40 Parahydroxybenzoate esters and their sodium salts, usually named parabens, have been used for  
41 many decades as antimicrobial preservative in cosmetics, food products and pharmaceutical  
42 formulations. Parabens are effective over a wide pH range with a broad spectrum of antimicrobial  
43 activity, and are also effective against yeasts and molds. Antimicrobial activity increases with  
44 increasing alkyl chain length for the commonly used methyl, ethyl, propyl, and butyl parabens, and  
45 synergy between parabens has been reported (Charnock and Finsrud, 2007). In oral pharmaceutical  
46 formulations, combinations of methylparaben and propylparaben are applied with concentrations  
47 generally ranging from 0.015 to 0.2% for methylparaben and 0.02% to 0.06% for propylparaben  
48 (Rowe et al, 2006). Other parabens are also used in pharmaceuticals to a lesser extent, such as  
49 ethylparaben and butylparaben. The latter is predominantly used in pharmaceutical formulations for  
50 the cutaneous route.

51 The current reflection paper addresses methyl- and propylparaben, as those are the parabens  
52 predominantly used in oral pharmaceutical formulations. Given the public concerns referred to above,  
53 the focus of this document is on possible endocrine-disrupting effects in humans.

54 After finalisation of this reflection paper, the EMA may propose an updated wording of parabens in the  
55 next revision of the “Guideline on Excipients in the Label and Package Leaflet of Medicinal Products for  
56 Human Use (CPMP/463/00).

## 57 **2. Discussion**

### 58 ***2.1. Absorption, Distribution, Metabolism and Excretion (ADME)***

#### 59 **Animal data**

60 In a recent study (Aubert et al, 2012), the absorption (plasma area under the curve) of methylparaben  
61 and propylparaben was studied following a single oral administration to the rat at a dosage of 100  
62 mg/kg. Following oral administration, the two substances showed a peak concentration in the blood  
63 between 30 min and 1 h post-dosing and the absorption was shown to be almost complete (88 to  
64 95%). The absorption was higher in females than males. Moreover, the absorption was shown to be  
65 dependent upon the length of the paraben ester chain, thus the relative absorption of propylparaben  
66 constituted 83% of the absorption of methylparaben.

67 In addition, the ADME profile of parabens has been determined in rats, dogs and rabbits (Jones et al,  
68 1956, Tsukamoto and Terada, 1964, Kiwada et al, 1980). Parabens appear to be very rapidly  
69 metabolized since only negligible levels of the parent compounds are detected in the blood within  
70 minutes after oral administration and paraben metabolites can be detected in the urine within an hour  
71 post-dosing. Irrespective of the species studied, the metabolism of parabens resulted in hydrolysis to

72 the principal metabolite para-hydroxybenzoic acid (PHBA). PHBA may be conjugated with glycine,  
73 glucuronic acid and sulfate to form para-hydroxyhippuric acid, PHBA-glucuronide or para-  
74 carboxyphenyl sulfate. Excretion is principally urinary and fast with more than 90% of the dose  
75 excreted within 24 h post-dosing.

## 76 **Human data**

77 The few human oral studies available generated similar results to those of the laboratory animal  
78 studies (Jones et al, 1956). Oral administration of methylparaben gives rise to fast absorption and  
79 marked and fast metabolism. The parent compound is found at negligible levels in the blood and PHBA  
80 is detected 3 minutes post-dosing. PHBA predominates among the urinary metabolites where it  
81 constitutes more than 50% of the administered dose 12 h after dosing. Data from biomonitoring  
82 studies showed (summary in SCCS/1446/11) that only small proportions of free parabens were  
83 detected whereas conjugates of parabens consisting of glucuronides and sulfate esters predominated  
84 both in serum and in urinary samples of adults. Higher proportions of free parabens were determined  
85 in urinary spot samples from preterm infants compared to adults.

86 Various types of esterases are responsible for the metabolism of parabens and glucuronides and  
87 sulphonate esters are formed subsequently, via involvement of various enzymes (based on data from  
88 dermal exposure, summary in SCCS/1446/11).

## 89 **2.2. Oestrogenic activity**

90 It has been demonstrated that parabens bind to oestrogen receptors with an affinity that is 10,000-,  
91 30,000-, 150,000- and 2,500,000-fold weaker (for butyl, propyl, ethyl and methylparaben,  
92 respectively) than that of the natural ligand, 17  $\beta$ -oestradiol (Routledge et al, 1998). Hence, the  
93 binding affinity measured increased with chain length (methyl < ethyl < propyl < butylparaben). This  
94 study showed also that the metabolite PHBA had no affinity for the oestrogen receptors. Another in  
95 vitro study showed that parabens display similar affinity for the 2 types of human oestrogen receptors  
96 (ER $\alpha$  and ER $\beta$ ) (Okubo et al, 2001, Blair et al, 2000). Whereas these receptor binding tests do not  
97 enable to differentiate agonist and antagonist activities, further studies tested the transactivating  
98 potency of parabens and showed that methyl-, ethyl-, propyl- and butylparaben exerted an agonistic  
99 effect on the oestrogenic receptor (Routledge et al, 1998). However, the effect occurred at paraben  
100 concentrations 10,000- to 1,000,000-fold greater than those of oestradiol. Yeast cells transfected with  
101 the human oestrogen receptor alpha, butyl-, propyl-, ethyl- and methylparaben showed relative  
102 responses which were 4000, 8000, 30,000, 200,000 and 3,000,000-fold weaker than 17  $\beta$ -oestradiol,  
103 respectively (Miller et al, 2001). Similarly, parabens stimulated the proliferation of a breast tumour cell  
104 line over-expressing oestrogen receptors (MCF-7) but the potency was 10,000- to 10,000,000-fold  
105 lower than for 17  $\beta$ -oestradiol (Okubo et al, 2001).

106 In order to test the ability of parabens to induce an oestrogen-type response in an organ sensitive to  
107 oestrogen stimulation, uterotrophic assays were performed in immature or ovariectomized female  
108 rodents (reviewed by Boberg 2010). Ethylparaben, propylparaben, isopropylparaben, butylparaben and  
109 isobutylparaben gave rise to oestrogenic activity (increased uterus weight) whereas methylparaben  
110 induced variable responses. The metabolite PHBA was devoid of effects following subcutaneous  
111 administration. In the immature mouse, PHBA had an oestrogenic effect, in contrast to what was  
112 observed in the rat. Methylparaben and butylparaben induced variable responses in immature mice  
113 whereas ethylparaben, propylparaben, butylparaben and isobutylparaben increased uterus weight. The  
114 oestrogenic activity occurred after administration of paraben doses 1,000- to 6,000-fold greater than  
115 the oestradiol-17  $\beta$  dose.

116 Another finding indicating that parabens possess some oestrogenic activity is that parabens have been  
117 shown to inhibit human cytosolic sulfotransferases (SULTs). SULTs are involved in the sulfonation of  
118 17- $\beta$  oestradiol causing oestradiol inactivation hence inhibition of sulfonation induces an increase in  
119 the quantity of active oestradiol (Harris et al, 2005). The results showed that the potency of SULT  
120 inhibition increased as the paraben carbon chain length increased. Butylparaben was found to be the  
121 most potent of the parabens in skin cytosol, yielding an IC50 value of 37  $\mu$ M (Prusakiewicz et al,  
122 2007).

123 The metabolite PHBA is a common metabolite for all parabens and therefore cannot be accountable for  
124 any significant endocrine disrupting effect given the large differences in effects between parabens of  
125 increasing ester chain length in various in vitro and in vivo models (SCCS/1446/11). Downstream  
126 metabolites consist of various glucuronides and sulfate esters, and also those are not considered likely  
127 to have any endocrine disrupting effects.

128 To conclude, parabens have been associated with oestrogenic activity in in vitro and in vivo models  
129 with the potency increasing with paraben carbon chain length. Still, the reported oestrogenic activities  
130 were considerably lower (1000 – 10,000,000-fold) than observed for the reference compound 17- $\beta$   
131 oestradiol.

### 132 **2.3. Developmental toxicity in males**

#### 133 **Methylparaben**

134 No effect on reproductive organ weight, spermatozoid count, or plasma luteinising hormone (LH),  
135 follicle stimulating hormone (FSH) or testosterone concentrations was observed when juvenile male  
136 rats were exposed via the diet for 8 weeks to methylparaben at approximate dose levels of 10 and  
137 1000 mg/kg/day (Oishi, 2004). Recently, a Good Laboratory Practice (GLP) compliant study, confirmed  
138 that methylparaben had no effect on male reproductive organs in the rat (Hoberman et al, 2008).

#### 139 **Propylparaben**

140 A 4-week repeat-dose study conducted on 21 days old juvenile Wistar rats exposed at doses of 0.01,  
141 0.1 or 1% propylparaben in the diet showed an effect on spermatogenesis. A decrease in the testicular  
142 and epididymal quantity of spermatozooids was observed with a lowest-observed adverse effect level  
143 (LOAEL) of 0.01% corresponding to an average propylparaben intake of 12.4  $\pm$  3 mg/kg/day. A dose-  
144 dependent decrease in serum testosterone concentration was significant at a dose of 1%,  
145 corresponding to 125  $\pm$  30 mg/kg/day propylparaben (Oishi, 2002b).

146 Recently, another GLP compliant study has been undertaken with a similar but more extensive design.  
147 Propylparaben was given by oral gavage to 4 main groups of 20 male Wistar rats at nominal doses of  
148 3, 10, 100 or 1000 mg/kg/day for 8 weeks starting from post natal day (PND) 21. A control group of  
149 20 males received the vehicle. One sub-group of 10 animals per group was necropsied at the end of  
150 the dosing period and the other after a 26-week treatment-free period. The following endpoints were  
151 assessed: morbidity/mortality, clinical condition, body weight, sexual maturation, LH, FSH and  
152 testosterone levels, organ weights, gross and microscopic pathology and sperm quality. Blood samples  
153 were taken from additional satellite animals at specific time-points after dosing on PND 21 and PND 77  
154 for toxicokinetics. There were no unscheduled deaths and no remarkable clinical changes in any group  
155 throughout the study. Similarly, there were no compound-related organ weight, macroscopic or  
156 microscopic changes in the testes and epididymides, and no evidence of an effect on sexual  
157 maturation, hormone levels, sperm count or motility, in any group at the end of the treatment and  
158 treatment-free periods. The toxicokinetic data showed that the duration of exposure between dosing

159 intervals was short; non-conjugated propylparaben was detected up to at the most 1 h (after 8 weeks  
160 dosing) - 4 h (data after first dose) after dosing in the highest dose group. If total concentrations (non-  
161 conjugated and a sulphoconjugate of propylparaben) are considered, exposure was evident for up to 4  
162 h (after 8 weeks dosing) - 8 h (data after first dose). The nominal dose of 1000 mg/kg/day was the no  
163 observed effect level (Gazin V. et al, submitted for publication).

## 164 **2.4. Developmental toxicity in females**

165 In a recent non-GLP study, the potential for parabens to affect reproductive parameters in female  
166 juvenile rats was evaluated (Vo et al, 2010). Female rats were treated orally (gavage) with 62.5, 250  
167 and 1000 mg/kg of either methyl-, ethyl-, propyl-, isopropyl-, butyl-, or isobutylparaben from PND 21  
168 to 40. Vo and co-workers demonstrated *in vitro* that the relative binding affinity to the ER $\alpha$  and ER $\beta$   
169 receptors increased with increasing paraben carbon chain length and branching, although the paraben  
170 showing the highest affinity (isobutyl), was at least 500 fold less potent than ethinylestradiol.  
171 However, this finding was not clearly translated to oestradiol-like effects in the *in vivo* setting for most  
172 parameters studied. The exception was effects on myometrial thickness and on the number of corpora  
173 lutea, where parabens with longer ester chain induced some changes in a dose related manner. No  
174 effect was observed with methylparaben. For propylparaben, increased myometrial hypertrophy was  
175 observed at 1000 mg/kg, while no significant effect was observed on the number of corpora lutea. In  
176 conclusion, no consistent effects were observed with methylparaben whereas propylparaben seemed to  
177 induce myometrial hypertrophy without any effect on uterus weight with a NOEL of 250 mg/kg.

178 Studies of the embryo-foetal development with methylparaben in the rat, mouse, hamster and rabbit  
179 indicated no effects up to the highest dose levels tested, i.e., 300 (rabbit) and 500 (rodent) mg/kg/day  
180 (EFSA review, 2004). Similar studies with propylparaben are lacking.

## 181 **3. Risk assessment**

### 182 *Background*

183 Risk assessments on parabens have been performed by several European expert panels including the  
184 European Food Safety Authority (EFSA) and the Scientific Committee on Consumer Safety (SCCS).  
185 EFSA established a full-group acceptable daily intake (ADI) of 0-10 mg/kg body weight for the sum of  
186 methylparaben, ethylparaben and propylparaben. The EFSA opinion dated July 2004 considered that  
187 propylparaben should not be included anymore in this group ADI due to effects on the male  
188 reproductive organs observed in juvenile rats and the lack of a clear NOAEL. As a consequence, from  
189 year 2006, propylparaben was no longer allowed for use as a food additive within the European Union  
190 (Directive 2006/52/EC).

191 Parabens are currently authorised in cosmetics at a maximum use concentration of 0.4% (acid) for a  
192 single and 0.8% for a mixture of parabens, respectively (directive 76/768/EEC). The SCCS opinion  
193 dated March 2011 proposes to modify these levels, considering the use of propylparaben and  
194 butylparaben in cosmetics as safe to the consumer, as long as the sum of their individual  
195 concentrations does not exceed 0.19%. This value is derived from a rat neonatal study where no  
196 effects were observed on testis (Fisher et al, 1999).

### 197 *Methylparaben*

198 Based on *in vitro* data, methylparaben does not display a significant activity at the oestrogenic  
199 receptors. Moreover, methylparaben has not been associated with adverse effects on the male  
200 reproductive organs in juvenile rats (applying doses up to 1 g/kg) or in embryo-foetal development  
201 studies conducted in rodents and non-rodents. Both studies in juvenile rats (Oishi, 2004 and Hoberman

202 et al, 2008) have been criticized for various reasons (see SCCS/1348/10), including the fact that safety  
203 margins cannot be calculated due to the lack of plasma exposure data. However, based on the totality  
204 of the *in vitro* and *in vivo* data, it can be concluded that methylparaben seems to be devoid of adverse  
205 effects on reproduction and development.

206 EFSA has established a full-group ADI of 0-10 mg/kg body weight for the sum of methyl and ethyl  
207 parabens and their sodium salts (Directive 2006/52/EC). This limit is considered applicable also for  
208 medicinal products and precludes the need for another (PDE) calculation based on ICH Q3C. The use of  
209 methylparaben of up to 0.2% as excipient in medicinal products is consistent with this limit.

#### 210 *Propylparaben*

211 Reduced spermatogenesis and serum testosterone level were observed following 4 weeks dietary  
212 dosing with 0.01, 0.1 and 1% propylparaben in the diet to PND 21 rats (Oishi, 2002b). The lowest-  
213 observed adverse effect level (LOAEL) detected in this study was 0.01% corresponding to 12.4  
214 mg/kg/day.

215 Such effects were not reproduced in a recent GLP-compliant study (Gazin et al), the design of which is  
216 more extensive. Hence, no effects on male reproduction parameters were seen following 8 weeks daily  
217 oral administration of doses up to 1000 mg/kg, to male rats from 3-11 weeks of age.

218 Different oral administration methods were applied in the Oishi (2002b) study and the recently  
219 conducted study; via the diet and gavage, respectively. From the Oishi (2002b) study, there are no  
220 data on the systemic exposure of the animals, which is a major limitation. Toxicokinetic data from the  
221 recently conducted study showed that the duration of exposure between dosing intervals was short.  
222 There are no adequate human data on the pharmacokinetic profile of orally administered  
223 propylparaben, e.g., following intake of a propylparaben containing pharmaceutical. However, based  
224 on data available, it can be anticipated that the systemic exposure to propylparaben following oral  
225 intake, at least in adults, is short. In addition, the metabolites are not considered likely to have  
226 endocrine disrupting properties, and consequently, the exposure to propylparaben is the main focus.  
227 While it is likely that dietary administration of propylparaben, as in the Oishi study, could have resulted  
228 in a more prolonged and even systemic exposure to propylparaben, gavage administration, as in the  
229 recently conducted study, more closely mimics the clinical setting following oral administration of a  
230 medicinal product. In addition due to the design and GLP conditions of the Gazin et al study, its results  
231 are considered to be more reliable. Thus, for oral administration of those pharmaceuticals which result  
232 in short (hour) daily (but repeated) exposure to propylparaben, the data from the newly conducted  
233 juvenile toxicity study provide reassurance regarding lack of risk for endocrine disrupting effects for  
234 propylparaben.

235 Regarding effects on female reproductive system development, a juvenile study using female rat  
236 showed limited effects of parabens. Propylparaben seemed to induce myometrial hypertrophy at 1000  
237 mg/kg with a NOEL of 250 mg/kg.

#### 238 *Administration of propylparaben containing medicine to children*

239 In the propylparaben study described by Gazin et al dosing of rats started on PND 21 and lasted for 8  
240 weeks. This treatment period corresponds to a human developmental period from approximately 2  
241 years up towards early adulthood, and includes critical development steps i.e. postweaning androgen  
242 secretion, prepubertal testosterone surges, development of secretory activity of seminal vesicles,  
243 decline in FSH responsiveness, replication of Leydig cells and initiation of spermatogenesis (Klonisch et  
244 al, 2004; Marty et al, 2003). This prepubertal period is considered as a sensitive period for studying  
245 potential effects on the male reproductive system development (Cortes et al, 1987; Müller et al, 1992).  
246 Although not addressing the neonatal period, there is support from the scientific literature that the

247 male reproductive system is not more sensitive in children below 2 years of age. Thus, in terms of the  
248 exposure during critical periods of development, the data from this study can be considered relevant  
249 also for children below 2 years of age at equivalent exposures.

250 However, a more extended exposure to propylparaben cannot be excluded after daily oral  
251 administration in very young children such as neonates, since they are anticipated to have less  
252 developed metabolic capacity of key enzymes involved in the metabolism of propylparaben, compared  
253 to adults. For these youngest children, adequate information regarding exposure to propylparaben  
254 after oral intake of a medicinal product containing propylparaben appears to be lacking. Thus, it is not  
255 possible to conclude that the data from the new study are fully reassuring for this low age group.  
256 Regarding estimation of an acceptable amount of propylparaben that can be included in an oral  
257 medicinal product, margins cannot be estimated based on toxicokinetics, given the lack of adequate  
258 human data.

259 On basis of a NOEL for propylparaben of 250 mg/kg/d derived in the Vo et al study (2010), a permitted  
260 daily exposure (PDE) for adults and metabolically mature children can be calculated according to the  
261 method outlined in ICH Q3C<sup>1</sup>. The following uncertainty factors are used: F1=5 (rat), F2=10  
262 (interindividual variation), F3=1 (exposure that covers juvenile period), F4=1 (lack of severity) and  
263 F5=1 (NOAEL available). This calculation gives rise to a PDE for propylparaben in adults and  
264 metabolically mature children of 5 mg/kg/d (250 mg/kg/d/ 5x10).

## 265 **4. Conclusion**

### 266 **General considerations**

267 The CHMP article 5(3) scientific opinion on 'The Potential Risks of Carcinogens, Mutagens and  
268 Substances Toxic to Reproduction When These Are Used as Excipients in Medicinal Products for Human  
269 Use' states under section 4. "Any risk identified for an excipient and in particular a CMR substance,  
270 would be acceptable only on condition that this excipient cannot be substituted with a safer available  
271 alternative, or that the toxicological effects in animal models are considered not relevant for humans  
272 (e.g. species specific, very large safety ratio) or where the overall benefit/risk balance for the product  
273 outweighs the safety concern with the product" .

274 As an antimicrobial preservative, the EMA Guideline on Excipients in the dossier for application for  
275 Marketing Authorisation of a Medicinal Product (EMEA/CHMP/QWP/396951/2006) states in its  
276 introduction: "Antimicrobial preservatives are normally added to prevent microbial proliferation arising  
277 under in use conditions. These properties are due to certain chemical groups which are usually harmful  
278 to living cells and might therefore be associated with certain risks when used in humans. Thus  
279 inclusion of antimicrobial preservatives or antioxidants in a medicinal product needs special  
280 justification. Wherever possible the use of these substances should be avoided, particularly in case of  
281 paediatric formulations. The concentration used should be at the lowest feasible level ."

### 282 **Specific considerations**

283 In oral pharmaceutical formulations, combinations of methylparaben and propylparaben are applied  
284 with concentrations generally ranging from 0.015 to 0.2% for methylparaben and 0.02% to 0.06% for  
285 propylparaben. Based on the current posology of medicines containing propylparaben, a concentration  
286 of 0.06% would correspond to a maximal oral intake of propylparaben of approximately 50 mg/day (or  
287 1 mg/kg/day when based on a patient weighing 50 kg).

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<sup>1</sup> ICH Topic Q3C Guideline for Residual Solvents defining the Permitted Daily Exposure PDE as the maximal dose level without any toxicity in the animal divided by safety/uncertainty factors:  $PDE = NOAEL / F1 \times F2 \times F3 \times F4 \times F5$  with F1 = inter-species extrapolation, F2 for inter-individual variability, F3 for adequacy of exposure period/duration of animal study, F4 for severity of the toxicity, An additional factor F5 = 10 is applied when only LOAEL has been determined.

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288 Methylparaben has not been associated with adverse effects on the male and female reproductive  
289 organs in juvenile rats or in embryo-foetal development studies. This allows concluding that the use of  
290 methylparaben in oral formulations up to 0.2% of the product (as within the recommended effective  
291 concentrations as a preservative) is not a concern for humans including the paediatric population  
292 whatever the age group.

293 Regarding propylparaben, certain oestrogenic activity has been seen in various experimental settings,  
294 but with approximately more than 10,000 fold lower activity than oestradiol in *in vitro* pharmacological  
295 models. The *in vivo* effects on sperm counts described in the study by Oishi in a juvenile rat model was  
296 not replicated in a more recent, well conducted toxicological study in juvenile rats of the same age as  
297 in the Oishi study. This study showed an absence of toxicological effects on the maturation of the male  
298 reproductive system, up to the highest dose of 1000 mg/kg/d of propylparaben, thus not indicating  
299 any endocrine disrupting potential. Based on the published results on the female reproductive system,  
300 a conservative NOEL of 250 mg/kg has been determined for propylparaben.

301 For children below 2 years a PDE for propylparaben cannot be determined because of uncertainty  
302 related to the maturation of the enzymes that metabolize propylparaben as well as the limitation of the  
303 available animal data corresponding to the youngest children. However safety margins identified in  
304 adults and children older than 2 years are currently reassuring. Nevertheless, for children below 2  
305 years further exposure data for propylparaben are needed. The use of a propylparaben containing  
306 formulation for the very young could be justified on a case-by-case basis from a benefit/risk  
307 perspective, weighting the need for treatment against the potential risk. This assessment should take  
308 into account several factors such as the posology and concentration of propylparaben, the treatment  
309 duration, the severity of the disease and availability of alternative treatments.

310 A PDE value of 5 mg/kg/day can be calculated for the use of propylparaben in adults and children older  
311 than 2 years with mature metabolic capacity.

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