

[REDACTED]

**EVALUATION OF SUN PROTECTION BY SPF DETERMINATION (FDA 2011)**  
**STATIC AND WATER RESISTANT (40 Minutes)**

[REDACTED]

**Date:** November 3, 2021

**Sponsor:** Supergoop! / Taylor James, LLC  
200 East Grayson Street, Suite 112  
San Antonio, TX 78215

**1.0 Objective:**

This panel has been convened to evaluate the effectiveness of a test material as a sunscreen product by determining the static and water resistant (40 minutes) Sun Protection Factor (SPF) on human skin. This study is defined by the U.S. Food and Drug Administration in "Sunscreen Drug Products For Over-The-Counter Human Use; Final Monograph", 21 CFR Parts 201 and 310, Subpart D (Federal Register / Vol.76, No. 117 / Friday, June 17, 2011; Docket number FDA-1978-N-0018.) A xenon arc solar simulator was used as the UV source. This test was conducted prior to and immediately following an immersion experiment which was carried out under controlled conditions [Water resistant (40 minutes) Testing] as described in the above mentioned monograph.

**2.0 Sample Description:**

On August 4, 2020, one test sample labeled (Re)Setting Refreshing Mist SPF 40, [REDACTED] was received from [REDACTED] and assigned [REDACTED]

**3.0 Test Material Handling:**

Upon arrival at [REDACTED] the test material was assigned a unique laboratory code number and entered into a daily log identifying the lot number, sample description, sponsor, date received and test(s) requested.

Samples are retained for a minimum period of three months beyond submission of final report unless otherwise specified by the sponsor. If the sample is known to be in support of governmental applications, samples are kept a minimum of two years beyond final report submission. Sample disposal is conducted in compliance with appropriate federal, state and local ordinances.

#### 4.0 Panel Composition:

Healthy volunteers over eighteen years of age were recruited for this study. A trained technician performed a physical examination of the panelist's back to determine if study eligibility criteria were satisfied. The panel consisted of fair-skin individuals with skin types I, II or III, based on the first 30 to 45 minutes of sun exposure after a winter season of no sun exposure, defined as follows: (Federal Register / Vol.76, No. 117 / Friday, June 17, 2011).

Type I - Always burns easily; never tans (sensitive)

Type II - Always burns easily; tans minimally (sensitive)

Type III - Burns moderately; tans gradually (light brown) (normal)

#### 4.1 Standards for Inclusion in the Study:

- a. Individuals eighteen years of age or older.
- b. Individuals free of any dermatological or systemic disorder which would have interfered with the results, at the discretion of the investigator.
- c. Individuals free of any acute or chronic disease that might have interfered with or increased the risk of study participation.
- d. Individuals with skin type I, II, and III only, as described above.
- e. Individuals with no uneven skin tones, pigmentation, scars, or other irregularities in test site areas that would have interfered with SPF determination.
- f. Individuals who have completed a preliminary medical history form mandated by [REDACTED] and were in general good health.
- g. Individuals, who have read, understood and signed an informed consent document relating to the specific type of study to which they were subscribing.
- h. Individuals who were able to cooperate with the investigator and research staff, willing to have test materials applied according to the protocol, and complete the full course of the study.
- i. Individuals who were willing to refrain from using sunscreen products, sunbathing or tanning bed use on the test sites, twenty four hours prior to study initiation and the entire duration of the study.
- j. Individuals with excessive hair on their back who were willing to clip.

#### 4.2 Standards of Exclusion from the Study:

- a. Individuals who were currently under a doctor's care.
- b. Individuals who were taking any medication (topical or systemic) that may have masked or interfered with the test results.
- c. Individuals with a history of any form of skin cancer, melanoma, lupus, psoriasis, connective tissue disease, diabetes or any disease that would have increased the risk associated with study participation.
- d. Individuals diagnosed with chronic skin allergies.
- e. Individuals with a history of adverse effects upon sun exposure.
- f. Female volunteers who indicated that they are pregnant or nursing.
- g. Individuals with blemishes, nevi, sunburn, suntan, scars, moles, active dermal lesions or uneven pigmentation in the test sites.
- h. Individuals with known hypersensitivity to any sunscreen products.

**4.3 Informed Consent and Medical History Forms:**

Each panelist completed an extensive medical history form and was assigned a permanent identification number. An informed consent was obtained from each volunteer describing the reasons for the study, possible adverse effects, associated risks and potential benefits of the treatment and their limits of liability. Panelists signed and dated the informed consent document to indicate their authorization to proceed and acknowledge their understanding of the contents. These forms are only available for inspection on the premises of [REDACTED]

**4.4 Panel Demographics:**

Number of panelists enrolled.....	10
Number of panelists completed study.....	10
Age Range.....	46 – 67
Sex.....	Male..... 2
	Female..... 8
Race.....	Caucasian..... 5
	Hispanic..... 2
	Asian..... 0
	African American..... 3

**5.0 Institutional Review Board (IRB):**

The annual IRB of [REDACTED] consists of five or more individuals from diverse backgrounds. They are chosen from the local community to review and approve clinical study documents like protocols, SOPs, ICFs, AE/SAE procedures, reports, etc. that are presented to them. A few members from within the company are also present for technical expertise only to answer questions, if any and do not participate in the voting process. The outcome of the IRB, list of members etc. is kept on file at [REDACTED] and is available for inspection during the hours of operation.

Reference: CFR Title 21 Part 56, Subparts A, B, C, and D.

**6.0 Artificial Light Source:**

The light source employed is a 150 watt Xenon Arc Solar Simulator (Solar Light Co., Philadelphia, Pennsylvania, Model 14S, 15S or Model 16S) having a continuous emission spectrum in the UVA and UVB wavelength range from 290 to 400nm. Xenon arc is selected on the basis of its black body radiation temperature of 6000K which produces continuous UV spectra (all wavelengths) substantially equivalent to that of natural sunlight.

This device is equipped with a dichroic mirror (which reflects all radiation below 400nm) and works in conjunction with a 1mm thick Schott WG-320 filter (which absorbs all radiation below 290nm) to produce simulation of the solar UVA-UVB spectrum. A 1mm thick UG 11 filter (black lens) was added to remove reflected (infra-red, greater than 700 nm) heat and remaining visible radiation. UVB radiation was monitored continuously during exposure using a Model DCS-1 Sunburn UV Meter/Dose Controller System (Solar Light Co.) formerly known as the Robertson-Berger Sunburn Meter (R-B meter). Measurements were taken at a position within 8mm from the surface of the skin. The solar simulator was allowed a warm up time of at least fifteen minutes before use and power supply output was recorded.

Realignment and certification of the Light Sources and calibration of the sunburn meters are conducted annually by independent certification facilities and more often as necessary at the discretion of the operating technician or investigator. The spectral analysis of the solar simulators used in this study is in compliance with the above mentioned monograph.

## 7.0 Procedure:

The procedure for this study is outlined in the Federal Register / Vol.76, No. 117 / Friday, June 17, 2011. The infrascapular area of the back to the right and left of the midline was used. Within this area, 30cm<sup>2</sup> rectangular test sites were delineated with a gentian violet surgical skin marker. Each test subsite was a minimum of 0.5cm<sup>2</sup> and separated from each other by at least 0.8cm as per the above mentioned monograph. Sites were observed to ensure uniform pigmentation, skin tone and texture, and absence of warts, moles, nevi, scars, blemishes and active dermal lesions. Any areas that might be expected to produce erratic results were not used for UV exposures.

### 7.1 Static SPF Determination (Including Padimate O/Oxybenzone Standard):

One test site area served to determine each panelist's Minimal Erythema Dose (MED). A minimum of five UV exposures were administered within this site. The individual panelist's MED is the shortest time of exposure that produces minimally perceptible erythema at sixteen to twenty four hours post irradiation.

The Padimate O/Oxybenzone SPF Standard was stirred, weighed in a syringe and applied to the test site using a finger cot. The test material was shaken, weighed in a syringe and applied to the test site using a finger cot. Both standard and test material were dispensed at a final concentration of 2.0mg/cm<sup>2</sup>. Evenness of each application was confirmed under a Wood's Lamp.

The UV exposures for the protected sites were calculated from the previously determined MED and the expected SPF as follows (where x equals the expected SPF of the product):

<b>Padimate O/Oxybenzone Standard (SPF 15):</b>	MED times 0.69x, 0.83x, 1.00x, 1.20x, and 1.44x
<b>S0804-A2 (SPF 40):</b>	MED times 0.76x, 0.87x, 1.00x, 1.15x, and 1.32x

At least fifteen minutes after application, the protected sites received a series of five UV exposures. On the actual day of testing another series of exposures similar to the one given on the previous day was administered to an adjacent untreated site of unprotected skin to re-determine the MED. All immediate responses were recorded after UV radiation exposure from the solar simulator.

### 7.2 Water Resistant (40 minutes) SPF Determination:

This test is employed to determine the substantivity of a test product and its ability to resist water immersion. Following the static test as previously described, one test area measuring 30cm<sup>2</sup> was assigned to serve as the site for test product for water resistant (40 minutes) SPF determination.

The test product was spread uniformly throughout the area at a concentration of 2.0mg/cm<sup>2</sup>, and then allowed a fifteen minute drying period as before. Evenness of application was confirmed under a Wood's Lamp.

Immersion was achieved indoors in a whirlpool tub with circulating water. Each panelist spent twenty minutes in the water, immediately followed by a fifteen minute rest period out of the water until a total of forty minutes in the water was achieved. The whirlpool bath was maintained at an average temperature of 74-89°F at moderate agitation.

After the last immersion, the test site was air dried without towelng for at least fifteen minutes prior to irradiation. The water and air temperatures were recorded. Evenness of the test material was confirmed under a Wood's Lamp after the panelist exited the tub.

After the fifteen minute dry time one test area measuring 30cm<sup>2</sup> was assigned to serve as the site for the Padimate O/Oxybenzone Standard after water immersion. The standard was spread uniformly throughout the area at a concentration of 2.0mg/cm<sup>2</sup>, and then allowed a fifteen minute drying period as before. Evenness of each application was confirmed under a Wood's Lamp.

The second series of test material exposures was administered to the protected areas. The exact series of exposures given was determined by the MED and the expected SPF of the product as before.

## 8.0 Evaluation of Responses:

The panelists were instructed to return to the testing facility sixteen to twenty four hours post exposure for evaluation of delayed erythemic responses. The technician who evaluated the MED did not know the identity of the test product application sites and UV exposures.

Visual grading scale:

- 0 = No Erythema
- ? = Questionable Erythema
- 1 = Minimal Erythema
- 2 = Slight Erythema
- 3 = Well-Defined Erythema
- 4 = Erythema and Edema
- 5 = Erythema and Edema in vesicles

Evaluation of the erythema responses was done in a room which is equipped with warm white fluorescent lighting which provides at least 450 lux of illumination.

## 9.0 Statistical Determination of the SPF:

### 9.1 Calculation of SPF :

The SPF value for each test subject (SPF<sub>i</sub>) was calculated as follows:

$$SPF_i = \frac{\text{Protected MED (MED}_p\text{)}}{\text{Unprotected MED (MED}_u\text{)}}$$

### 9.2 Calculation of the mean SPF:

The mean SPF value ( $\overline{SPF}$ ) as well as the standard deviation (s) was calculated from the SPF<sub>i</sub> values.

### 9.3 Calculation of the Standard Error:

The standard error (SE) was also calculated, where n equals the number of subjects who provided valid results.

$$SE = s/\sqrt{n}$$

### 9.4 Calculation of t Value:

The t value was calculated from the t distribution which corresponds to the upper 5% point with n-1 degrees of freedom.

### 9.5 Determination of the labeled SPF Value:

The labeled SPF value, is equal to the largest whole number less than the  $\overline{SPF} - (t * SE)$ .

To be considered a valid test panel:

- The test panel must include a minimum of ten valid test results. A maximum of 3 subjects may be rejected; therefore a test panel may include up to thirteen total test subjects.
- The SPF value of the Padimate O/Oxybenzone SPF standard should fall within the SE range of the expected SPF (i.e. 16.3 +/- 3.43).

## 10.0 Rejection Criteria:

Panelist's results are rejected and the panelist replaced if:

- a. An exposure series failed to elicit an MED response on either the unprotected or protected test sites. The test was considered a technical failure even if the MED response is observed in the protected site.
- b. The responses on the protected area were randomly absent or inconsistent with the UV doses administered, indicating uneven product spreading, non-constant light irradiance or an unstable product.
- c. All exposures in a series elicit erythematous responses - thus prohibiting any MED calculation.
- d. The test subject is noncompliant.

## 11.0 Adverse Reactions:

Panelists were instructed to promptly report adverse effects to the investigator. The investigator would then determine the need for an interim examination and, if warranted, termination from the study. Any adverse effect(s), spontaneously expressed by the panelist or observed by the investigator or research staff, during or after the study were recorded on an Adverse Effect(s)/Intercurrent Event(s) Report.

## 12.0 Observations:

No adverse effects or unexpected reactions of any kind were observed on any of the panelists.

## 13.0 Results:

Please see attached Table.

**14.0 Archiving and Confidentiality:**

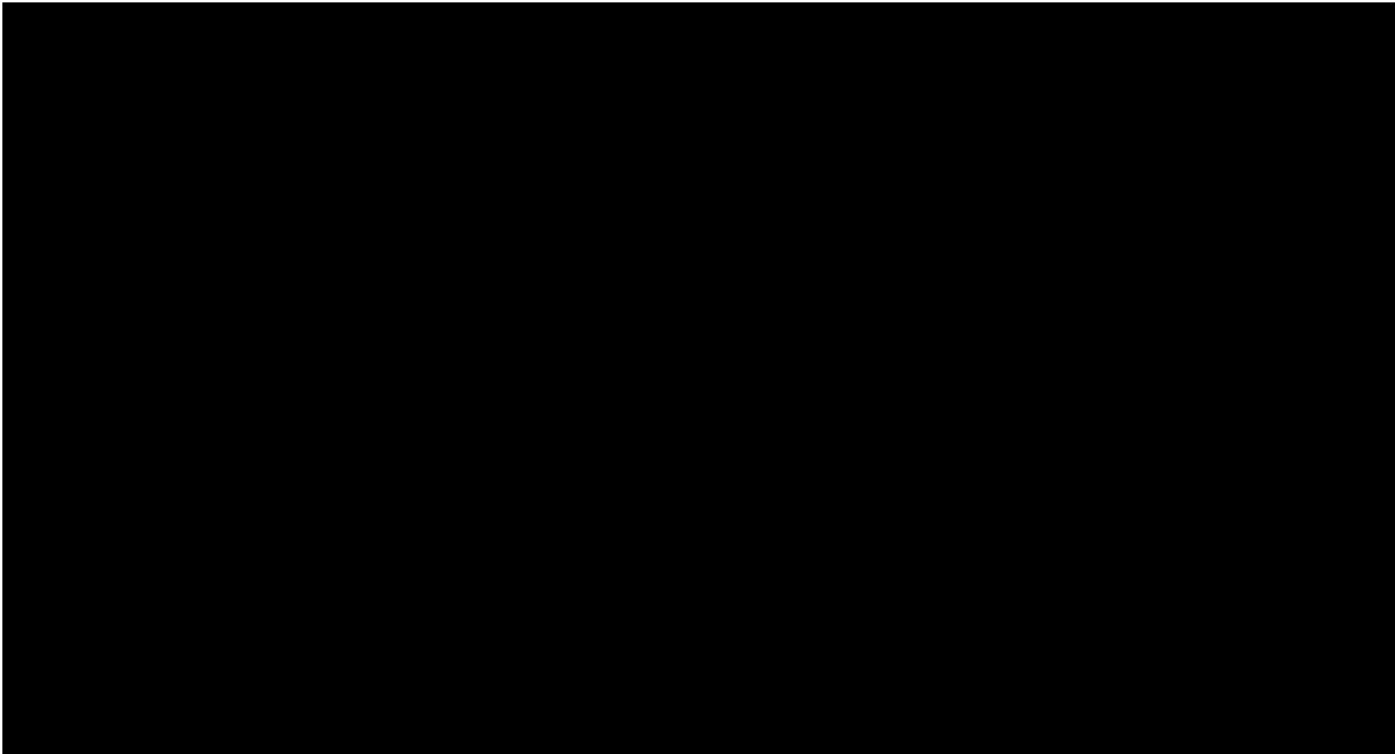
Hard copies of records such as raw data sheets, correspondence between the sponsor and [REDACTED] executed ICFs, IRB approvals, AEs/SAEs associated with the study, etc. are maintained on the premises of [REDACTED] in limited access storage files marked "Archive" for at least five years or more when specified by appropriate regulatory requirements. Electronic backups of reports are done on a secured server and a copy kept in an offsite secure location. Other study related information and documents such as forms, subject database, etc. are stored in a secure place at the lab.

The Principle Investigator (PI) & employees of [REDACTED] will keep the test product, test related information, and the sponsor's identity confidential.

**15.0 Conclusion:**

The Sun Protection Factor (SPF) of the test material [REDACTED] (Re)Setting Refreshing Mist SPF 40, [REDACTED] when tested on ten panelists as described herein under static and water resistant (40 minutes) conditions yielded the mean SPF values of 43.60 and 43.00, respectively. The test material can claim an SPF label of 41 under static conditions and 40 under water resistance (40 minute) conditions, according to the reference.

On the same panel, the mean SPF of the Padimate O/Oxybenzone Standard before water immersion was 16.20 and following water immersion was 15.90.



**EVALUATION OF SUN PROTECTION BY SPF DETERMINATION (FDA 2011)  
STATIC AND WATER RESISTANT (40 Minutes)**

**Table 1**

**Sponsor:** Supergoop! / Taylor James, LLC

**Client No.:** (Re)Setting Refreshing Mist SPF 40, [REDACTED]

**Expected SPF:** 40

Exp. Date	#	Subject					Lamp Output		MEDu (J/M <sup>2</sup> )	SPF Values (MEDp)			
		ID #	Age	Sex	Race	Type	MED/ Hr	I (Amps)		STD (ssMEDp) (B.W.) (A.W.)		Product (tpMEDp) (B.W.) (A.W.)	
9/7	1	03 8467	48	M	AA	III	132.0	7.0	56.69	18.00	18.00	46.00	46.00
9/16	2	03 9169	62	F	C	II	132.0	5.5	46.20	15.00	15.00	40.00	40.00
9/23	3	03 6057	63	F	C	II	131.0	7.5	46.20	15.00	15.00	40.00	40.00
10/5	4	03 9550	46	F	AA	III	132.0	6.5	56.69	18.00	18.00	46.00	46.00
10/6	5	03 9130	59	M	AA	III	130.0	6.5	56.69	18.00	15.00	46.00	46.00
10/7	6	03 9678	49	F	H	II	132.0	6.5	46.20	15.00	15.00	46.00	46.00
10/7	7	03 9374	56	F	C	II	130.0	7.5	46.20	15.00	15.00	46.00	46.00
10/12	8	03 8404	67	F	C	I	131.0	7.5	46.20	15.00	15.00	40.00	40.00
10/12	9	03 9692	53	F	H	II	132.0	6.5	46.20	18.00	18.00	46.00	40.00
10/14	10	03 9354	59	F	C	II	130.0	7.5	46.20	15.00	15.00	40.00	40.00
<b>Mean SPF (x)</b>										<b>16.20</b>	<b>15.90</b>	<b>43.60</b>	<b>43.00</b>
<b>Standard Deviation (s)</b>										<b>1.55</b>	<b>1.45</b>	<b>3.10</b>	<b>3.16</b>
<b>Standard Error (SE)</b>										<b>0.49</b>	<b>0.46</b>	<b>0.98</b>	<b>1.00</b>
<b>Number of Subjects (n)</b>										<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>
<b>Upper 5% t DIST. (t)</b>										<b>2.2622</b>	<b>2.2622</b>	<b>2.262</b>	<b>2.262</b>
<b>Label SPF</b>										<b>15</b>	<b>14</b>	<b>41</b>	<b>40</b>

< Erythema in all subsites

\* Data not included in calculations

- I: Intensity of Light Source
- MED/HR: Minimal Erythema Dose per Hour
- MEDu: Minimal Erythema Dose of Unprotected Skin
- MEDp: Minimal Erythema Dose of Protected Skin
- ssMEDp: Minimal Erythema Dose of Skin Protected by Sunscreen Standard
- tpMEDp: Minimal Erythema Dose of Skin Protected by Test Product
- WR: Water Immersion (40 minutes)
- B.W.: Before Water Immersion
- A.W.: After Water Immersion
- STD: 2011 FDA Standard Padimate O/Oxybenzone

**Study Period:** This study was conducted from September 3, 2020 through October 16, 2020.



**EVALUATION OF SUN PROTECTION BY SPF DETERMINATION (FDA 2011)  
STATIC AND WATER RESISTANT (40 Minutes)**

**Table 2**

**Sponsor:** Supergoop! / Taylor James, LLC

**Client No.:** (Re)Setting Refreshing Mist SPF 40,

Exp. Date	#	Subject ID #	Lamp Output		MEDu (J/M <sup>2</sup> )	Exposure Timings (MEDp)			
			MED/ Hr	I (Amps)		STD (ssMEDp)		Product (tpMEDp)	
						(B.W.)	(A.W.)	(B.W.)	(A.W.)
9/7	1	03 8467	132.0	7.0	56.69	1020.42	1020.42	2607.74	2607.74
9/16	2	03 9169	132.0	5.5	46.20	693.00	693.00	1848.00	1848.00
9/23	3	03 6057	131.0	7.5	46.20	693.00	693.00	1848.00	1848.00
10/5	4	03 9550	132.0	6.5	56.69	1020.42	1020.42	2607.74	2607.74
10/6	5	03 9130	130.0	6.5	56.69	1020.42	850.35	2607.74	2607.74
10/7	6	03 9678	132.0	6.5	46.20	693.00	693.00	2125.20	2125.20
10/7	7	03 9374	130.0	7.5	46.20	693.00	693.00	2125.20	2125.20
10/12	8	03 8404	131.0	7.5	46.20	693.00	693.00	1848.00	1848.00
10/12	9	03 9692	132.0	6.5	46.20	831.60	831.60	2125.20	1848.00
10/14	10	03 9354	130.0	7.5	46.20	693.00	693.00	1848.00	1848.00

< Erythema in all subsites

\* Data not included in calculations

I: Intensity of Light Source  
 MED/HR: Minimal Erythema Dose per Hour  
 MEDu: Minimal Erythema Dose of Unprotected Skin  
 MEDp: Minimal Erythema Dose of Protected Skin  
 ssMEDp: Minimal Erythema Dose of Skin Protected by Sunscreen Standard  
 tpMEDp: Minimal Erythema Dose of Skin Protected by Test Product  
 WR: Water Immersion (40 minutes)  
 B.W.: Before Water Immersion  
 A.W.: After Water Immersion  
 STD: 2011 FDA Standard Padimate O/Oxybenzone

[REDACTED]

**EVALUATION OF IN-VITRO BROAD SPECTRUM TEST**  
**FDA METHOD (2011 FINAL RULE)**

[REDACTED]

**Date:** November 3, 2021

**Sponsor:** Supergoop! / Taylor James, LLC  
200 East Grayson Street, Suite 112  
San Antonio, TX 78215

**1.0 Objective:**

To measure the critical wavelength of a sunscreen product in accordance with the Broad Spectrum Test of 21 FDA CFR Parts 201 and 310; Sunscreen Drug Products for Over-the-Counter Human Use and Labeling and Effectiveness testing. Federal Register, Vol. 76, No. 117, June 17, 2011, using Labsphere's UV-2000S Benchtop Sunscreen Analyzer. Irradiation was done using the Solar Light Xenon Arc Fade Test UV Simulator – Model 16S-300-003 V4.0.

**2.0 Test Material:**

On August 4, 2020, one test sample labeled (Re)Setting Refreshing Mist SPF 40, [REDACTED] was received from [REDACTED] and assigned [REDACTED]

**3.0 Test Material Handling:**

Upon arrival at [REDACTED] the test material was assigned a unique laboratory code number and entered into a daily log identifying the lot number, sample description, sponsor, date received and test(s) requested.

Samples are retained for a minimum period of three months beyond submission of final report unless otherwise specified by the sponsor. If the sample is known to be in support of governmental applications, samples are kept a minimum of two years beyond final report submission. Sample disposal is conducted in compliance with appropriate federal, state and local ordinances.

**4.0 UV Spectrometry:**

**4.1 Light Source:**

The light source employed is a 150 watt Xenon Arc Solar Simulator (Solar Light Co., Philadelphia, Pennsylvania, Model 16S) which has a continuous spectral distribution of UV radiation from 290 to 400nm.

Realignment and certification of the Light Source and calibration of the sunburn meter is conducted annually by independent certification facilities and more often as necessary at the discretion of the operating technician or investigator. The spectral analysis of the solar simulator used in this study is in compliance with the above mentioned monograph.

#### **4.2 Substrate:**

Optical-grade polymethyl methacrylate (PMMA) plates, manufactured by Helioscreen, were used for this test. Plates are designed to be roughened on one side to a three dimensional surface topography measure (Sa) of 6 micrometers (HD 6  $\mu\text{m}$ ). Plates have a rectangular application area of approximately 25 square centimeters (25  $\text{cm}^2$ ).

#### **4.3 Spectrometer:**

Labsphere's UV-2000S measures spectral transmittance across the 250-450 nm wavelength spectrum using an integrating sphere and two spectrometer instruments.

The sample holder (sample stage assembly) is equipped with an X-Y stage for positioning a sample plate with nine specific numbered sites to follow. Five sites are chosen. The stage incorporates a mask to ensure accurate and consistent sample test results.

#### **4.4 Input Optics:**

The UV-2000S optical components are housed in upper and lower optical chambers called the optics head and input optics. The UV-2000S is equipped with an integrating sphere constructed of Spectralon, a highly diffuse reflective material.

#### **4.5 Dynamic range of the spectrometer:**

The UV-2000S is equipped with two diode array spectrometers (Spectrometer No. 1 and Spectrometer No. 2). The spectrometers are identical except that operate one after the other during the scanning process so that data collection from the integrating sphere and lower chamber occurs simultaneously. UVB calculations are performed across the 290-450nm spectrum.

### **5.0 Procedure:**

#### **5.1 Test Material Application to PMMA Plate:**

The test material was applied to the roughened side of three PMMA plates at 0.75 mg per square centimeters (0.75 $\text{mg}/\text{cm}^2$ ) by a trained technician. The test material was evenly spread over each plate using a finger cot. The PMMA plates were then allowed to equilibrate for fifteen (15) minutes in the dark.

Additionally, 15  $\mu\text{l}$  of glycerin (no sunscreen product) was evenly spread on a PMMA plate which was used as a reference plate.

## 5.2 Test Material Pre-Irradiation:

To account for the lack of photostability, the PMMA plates applied with the test material were irradiated with a solar simulator (described in section 4.1) at a fixed dose of UV irradiation of 4 MEDs (Minimal Erythema Dose) which is equivalent to an erythema effective dose of 800 J/m<sup>2</sup> eff.

## 5.3 Calculation of Mean Transmittance Values:

After pre-irradiation the mean transmittance values were determined for each wavelength  $\lambda$  over the full UV spectrum (290 to 400 nm). Transmittance values were measured at 1nm intervals. Measurements of spectral irradiance transmitted for each wavelength through control PMMA plates (no test material applied) were obtained from at least five (5) [C1( $\lambda$ ), C2( $\lambda$ ), C3( $\lambda$ ), C4( $\lambda$ ) and C5( $\lambda$ )] different locations on the plate.

Five (5) measurements of spectral irradiance transmitted for each wavelength through the PMMA plate applied with the test material were similarly obtained after the pre-irradiation of the test material [P1( $\lambda$ ), P2( $\lambda$ ), P3( $\lambda$ ), P4( $\lambda$ ) and P5( $\lambda$ )].

The mean transmittance for each wavelength,  $\overline{T(\lambda)}$ , is the ratio of the mean of the C( $\lambda$ ) values to the mean of the P( $\lambda$ ) values as follows:

$$\overline{T(\lambda)} = \frac{\sum_i^n P(\lambda) / n}{\sum_i^n C(\lambda) / n}$$

## 5.4 Calculation of Mean Absorbance Values:

Mean transmittance values  $\overline{T(\lambda)}$ , are converted into mean absorbance values  $\overline{A(\lambda)}$ , at each wavelength by taking the negative logarithm of the mean transmittance values as follows:

$$\overline{A(\lambda)} = - \log \overline{T(\lambda)}$$

## 5.5 Number of Plates:

Three (3) individual plates were used for each test material. Therefore a total of fifteen (15) measurements were used to determine the mean absorbance values for each test material.

## 5.6 Calculation of the critical wavelength:

The critical wavelength is identified as the wavelength at which the integral of the spectral absorbance curve reaches 90 percent of the integral over the UV spectrum from 290 to 400 nm. A mean critical wavelength of 370 nm or greater is classified as broad spectrum protection.

**6.0 Results:**

Please see attached Table.

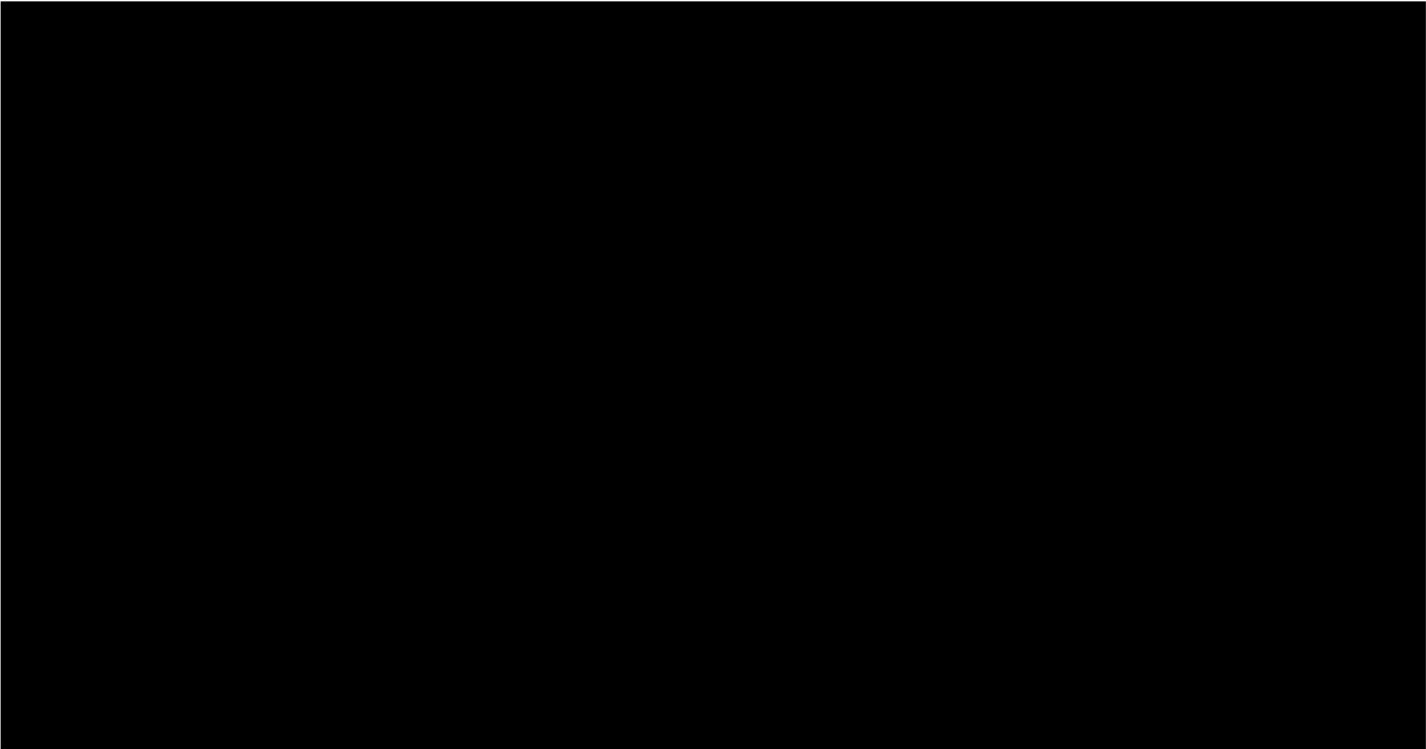
**7.0 Archiving and Confidentiality:**

Hard copies of records such as raw data sheets, correspondence between the sponsor and [REDACTED] etc. are maintained on the premises of [REDACTED] in limited access storage files marked "Archive" for at least five years or more when specified by appropriate regulatory requirements. Electronic backups of reports are done on a secured server and a copy kept in an offsite secure location. Other study related information and documents such as forms, instrumental reports, etc. are stored in a secure place at the lab.

The Principle Investigator (PI) & employees of [REDACTED] will keep the test product, test related information, and the sponsor's identity confidential.

**8.0 Conclusion:**

The test material [REDACTED] Client No.: (Re)Setting Refreshing Mist SPF 40, [REDACTED] when tested on three PMMA plates as described herein using Labsphere's UV-2000S for analysis yielded the mean critical wavelength value of 373.93, which may be classified as **Broad Spectrum Protection**, according to the reference.



EVALUATION OF IN-VITRO BROAD SPECTRUM TEST  
FDA METHOD (2011 FINAL RULE)

Table

Sponsor: Supergoop! / Taylor James, LLC

Client No.: (Re)Setting Refreshing Mist SPF 40,

Plate 1 (avg. 5 sites)	Plate 2 (avg. 5 sites)	Plate 3 (avg. 5 sites)	Mean (avg. 3 plates)	*Pass/ **Fail
374.00	374.00	373.80	373.93	*PASS

\* Pass ( $\geq 370\text{nm}$ )

\*\* Fail ( $< 370\text{nm}$ )

# FDA Method (2011 Final Rule)

## Results Report

Sample: [REDACTED]

Description: (Re)Setting Refreshing Mist SPF 40  
[REDACTED]

Operator: [REDACTED]

Client: Supergoop ! / Taylor James LLC

Comment:

Date: 9/14/2020 10:34:54 AM  
[REDACTED]

### Product Results

Critical Wavelength Mean 373.93

Broad Spectrum Protection Pass

### Substrate Data

	Critical Wavelength	Broad Spectrum Protection
Substrate 1 post-irradiation	374.00	Pass
Substrate 2 post-irradiation	374.00	Pass
Substrate 3 post-irradiation	373.80	Pass

Set Averages

