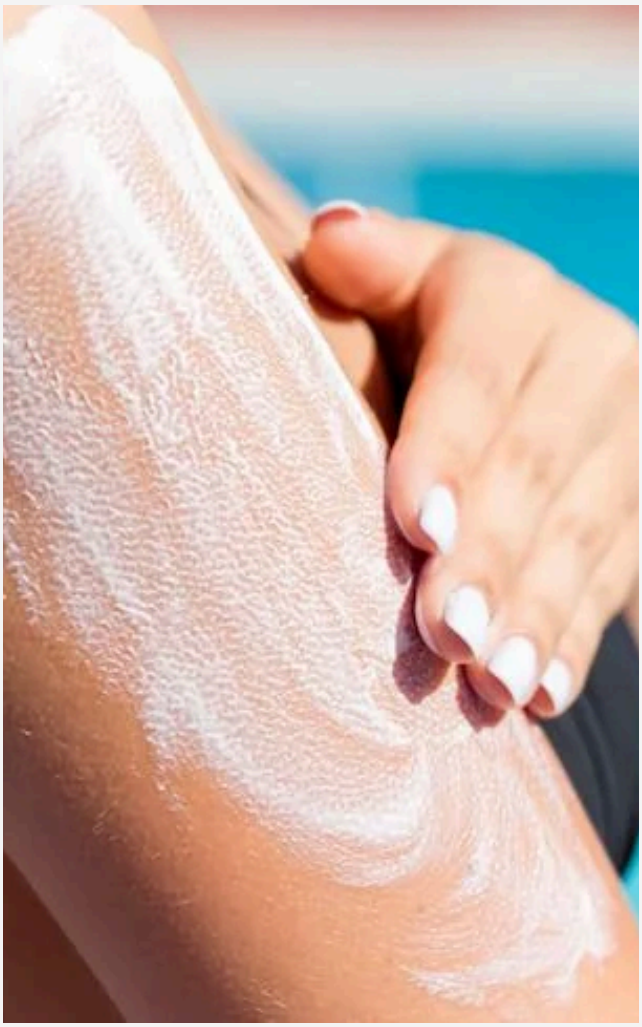
OFFICIAL STATEMENT ON SPF RETESTING, MEDIA REPORTS, AND RECENT MISINFORMATION

Princeton Consumer Research (“PCR”) is issuing this statement following recent media activity and online commentary concerning zinc-based sunscreen formulations and selective retesting conducted by a third-party laboratory. We wish to provide clarity, reinforce the accuracy of our clinical work, and correct several false and misleading claims now circulating publicly.

PCR stands fully and confidently behind every SPF study conducted in our global laboratories.

PCR operates one of the most experienced clinical research networks in the world, with over 30 years of continuous clinical and regulatory testing expertise. We were lucky enough to be involved with the very first COLIPA meetings in Brussels some 30+ years ago and have been involved in SPF testing since then. Our global facilities are independently certified to ISO 9001:2015 for the safety and efficacy testing of cosmetics and OTC drug products, including in vivo SPF studies, UVA/UVAPF testing, water-resistance verification, and comprehensive clinical dermatology assessments.



PCR does not manufacture products and has no financial stake in whether a sunscreen passes or fails.

Our only duty is scientific accuracy and regulatory compliance. It is important to note that the data provided on any study is based on the sample provided for testing and any change to INCI lists can affect synergies between different active ingredients which can and does affect the efficacy of the final product formulation.

Zinc-based formulations require specialised expertise due to zinc oxide's density, rheology, and extreme sensitivity to film thickness and application technique.

PCR employs:

- Full 10-subject ISO-compliant panels (not 1–3 subject indicative screens)
- Technicians specifically trained in high-mineral formulations
- Verified mass-application procedures
- Film-uniformity checks appropriate for zinc oxide
- Calibrated UV dose ladders capable of detecting SPF50+ performance
- Testing strictly on original, labelled packaging (ISO requirement)

Our laboratories have repeatedly achieved high, reproducible SPF50+ results for mineral sunscreens when properly formulated and supplied in their final marketed condition. Recent retesting cited in the media was methodologically flawed and cannot be compared to PCR's results.

Critical issues with the retesting include:

- Only 1–3 subjects were used
- Not ISO-compliant and not statistically valid
- Not acceptable to regulators for SPF substantiation
- No verified film-thickness measurement
- Zinc oxide tested using methods that cannot visualise its film uniformity
- Use of UV dose ladders too low to detect SPF50 behaviour
- Decanting product into unlabelled containers, altering its performance
- Results contradicting the same laboratory's own prior SPF50 findings for the identical formula as was the case with Dermatest/Eurofins.

The Therapeutic Goods Administration (TGA) itself states:
"It would be necessary to retest the product several times and obtain consistently low mean results before any conclusion could be drawn about the labelled SPF being unjustified."
No such multi-study evidence exists. Therefore, these preliminary results are not valid, not regulatory compliant, and should not have been used publicly.

Over the past two years, several Australian manufacturers, mainly due to cost pressures and supply disruptions, have shifted to lower-grade, non-monograph zinc oxide that does not meet:

- USP
- BP
- Ph.Eur
- or Cosmetics Pharmacopoeia standards

These inferior grades have:

- Poor purity
- Heavy-metal contamination
- Incorrect particle-size distribution
- Weak dispersibility
- Instability under UV exposure

And crucially:
They produce highly unstable SPF performance, even under controlled testing.

This is not speculation, multiple TGA submissions and international studies have highlighted these issues. PCR's clients overwhelmingly use pharmacopoeial-grade zinc oxide, which is why their results are stable, repeatable, and scientifically consistent across accredited labs.
The media narrative has incorrectly attributed SPF variability to "testing differences," when in reality, raw material quality has been a major and unreported factor in inconsistent SPF outcomes discovered in some Australian products along with testing capabilities at some Australian labs. PCR has, over many years, had clients come to us, after testing with the lab in question, after getting unreliable testing results that do not match other testing they did. In fact, one of the products tested that did not pass on the choice test, was in fact tested by the same lab Dermatest/Eurofins in 2021. This alone shows the inconsistency with the testing at this lab alone. This context is critical, and absent from public reporting.

When examined together:

- PCR's ISO-compliant, 10-subject studies remain reliable
- PCR's results match other accredited labs globally
- The competitor retesting was methodologically insufficient
- Poor-quality zinc oxide in parts of the Australian market has caused SPF instability

The inconsistencies do not originate from PCR but can be seen because of potentially Inferior raw materials, and scientifically invalid retesting methods.

PCR is also aware of recent online comments made by an individual Brian Ecclefield who briefly worked for PCR nearly a decade ago and is now operating a small commercial enterprise Validated Claim Support positioned as a competitor in the testing space.

To be absolutely clear:
His statements are false, scientifically unsupported, and do not reflect PCR in any capacity. PCR's 30 Years of expertise vs. the source of these claims is clear:
PCR's leadership includes decades of:

- Clinical study design
- Protocol development
- SPF and UVAPF methodology
- Regulatory submissions
- Large-scale clinical operations

The individual making these claims (Brian Ecclefield):

- Held a business development role, in a team of 5 business development managers, not a scientific position
- Had no involvement in clinical research, SPF testing, protocol design, or laboratory method development in any way whatsoever. He was not, and is not, qualified to design clinical studies in anyway whatsoever. He has never worked on clinical studies or had any formal training in protocol design or hands-on clinical experience.
- Did not possess clinical training, regulatory expertise, or scientific credentials
- Worked for PCR for approximately nine months, almost ten years ago
- Relied entirely on clinical staff to produce technical material
- Left PCR due to professional conduct concerns overstepping his abilities

Following his departure from PCR, this same individual attempted to run an SPF testing business, within his small clinical unit based in a shopping mall in NJ. He employed clinical technicians from his previous company AMA, which closed under a cloud, but due to inconsistent results for several international clients and the inability to explain international standards correctly, he closed down the SPF testing side of his operation. This alone reinforces the substantial expertise and infrastructure required to operate in this field and clearly demonstrates that he did not possess this.

His attempt to publicly portray himself as a, “16-year expert in clinical protocol design”, is entirely inconsistent with his actual employment history and experience. His commentary does not meet any reasonable threshold of technical credibility.

PCR will not allow false narratives to undermine scientific integrity. Our reputation has been built over three decades, across thousands of audited clinical studies. Unsupported statements made by individuals with no scientific background do not reflect PCR’s methods, quality, or history. Professionally, it is clear that this outburst was a last ditched attempt to discredit a former employer, almost 10 years after leaving, and to promote his own company. Instead, he has shown how unprofessional an organisation he is running and highlighted his own inadequacies by claiming to be something he clearly is not, an expert.

In the meantime, PCR remains committed to:

- **Scientific accuracy**
- **Absolute regulatory compliance**
- **Transparent communication**
- **Protecting consumers and brands from misinformation**

PCR’s Scientific Leadership & Global Reputation:
The PCR team is a well-published, internationally recognised group of scientific professionals with more than 30 years of documented research and clinical publishing experience. Our staff have worked alongside many of the world’s largest cosmetics and pharmaceutical companies, contributing to the development, validation, and regulatory approval of countless global products. For decades, PCR has been regarded as an industry leader in clinical testing procedures, methodological expertise, and regulatory understanding. Our long-standing relationships with clients reflect not only our technical capability, but our consistency, integrity, and scientific reliability across every study we conduct.

PCR encourages regulators, brands and media to rely on qualified, accredited laboratories and valid ISO-compliant data, not preliminary 1–3 subject results or commentary from unqualified sources.

Princeton Consumer Research

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