Livestock

Ide	ntification of Petit	tioned Substance
	07	
Chemical Names:	27	Trada Namaa
Mineral oli	28	Trade Names:
Othern Manager	29	Drakeol®
Other Names:		CASNembarra
		CAS Numbers:
Light mineral oil		04/42-4/-0 8042-47 E
Heavy mineral oil		0042-47-5 2012 0F 1
Mineral oil, high viscosity		8012-90-1 8000 82 E
Paraffin oil		0020-03-3 64740 EE 8
Liquid paraffin		04742-55-0
Light liquid paraffin		04742-30-9 64742 6E 0
Paraffinum liquidium		04/42-03-0
Liquid petrolatum		72023-04-0
Light liquid petrolatum		72020-00-0 70602 87 1
Paraffinum parliquidum		72020-07-1 8010 05 1
Food grade mineral cil		8042 47 5
Food grade white ail		0042-47-5
Ploo		92002-55-0
P70 P70H		Other Codes:
N70, N70H		RTECS No. $PV8047000$
P15 P15H		RTECS No. PY8030000
N15 N15H		KIEC5 NO. 1 10030000
1110,111011	Summary of Pot	titioned Use
	Summary of Fet	ittorieu Ose
The U.C. Demonstrates of Aprillaria (I	(ICDA) National O	And the second the second the second field of
The U.S. Department of Agriculture (USDA) National Organic Program (NOP) has approved the use of		
intertinal composition prohibited for a	nowed for use in t	researt" in Title 7 of the Code of Federal
Regulations (CER) Part 205 603 The N	IOP has also appr	aved the use of mineral oil "for tonical use and as a
hubricant" in § 205.602	101 has also appro	sved the use of himeral on tor topical use and as a
lubricant 111 § 205.005.		
The National Organic Standards Boar	d (NOSB) request	ad this tachnical report to undate the provious
technical reports on mineral oil with	a focus on uses for	intestinal compaction in support of the uncoming
support roviow for the substance (USD		5) This report will focus on the veterinary
applications of mineral oil as a treatm	ent of intestinal co	mpaction within organic livestock production
applications of milleral on as a reading	ent of intestinui co	inpaction whill organic investock production.
Char	acterization of Pet	titioned Substance
Composition of the Substance		
Mineral oil is not a single substance by	ut is composed of	a mixture of hydrocarbons isolated from crude petrol
oil (EPA 2007, EESA 2012, LARC 2012)	Mineral oil com	rises three main types of compounds: saturated
paraffins, napthenes, and aromatics (F	EFSA 2012, IARC 2	2012). Saturated paraffins (alkanes) are linear and
branched hydrocarbons that include c	nly single honds t	broughout their chemical structures (FFSA 2012
Timberlake 2016). Saturated nanthene	s also include only	v single bonds within their chemical structures but u
paraffins, they also include rings (EES	A 2012). Nanthene	es may include one or multiple rings and may also
include alkyl groups (hydrocarbons) e	extending from the	ese ringed structures (EFSA 2012). Unlike paraffins ar
napthenes, aromatics are cyclic hydro	carbons that inclu	de carbon-carbon double bonds (EFSA 2012, Timber)

54 2016). However, aromatic compounds that are present in mineral oils have double bonds that are limited to the 55 aromatic ring portions of the chemical structure (EFSA 2012). Like napthenes, the aromatic compounds found in

56 mineral oil may include multiple aromatic rings and alkyl groups extending from these ringed structures (EFSA

57 2012). Figure 1 below shows some examples of the three classes of compounds found in mineral oil, with "R"

- 58 representing one or more alkyl groups (EFSA 2012).
- 59 60

61

Figure 1. Compound classes within mineral oil



62



The exact composition of compounds within mineral oil is based on the petroleum source and the refining 65 conditions, as shown by the many CAS numbers that classify mineral oil (EFSA 2012, IARC 2012). Initial crude oils' compositions are generally classified by their source regions below in Table 1.

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Table 1. Compositions of petroleum crude oil by region

Tuble 1. Compositions of perfoream crude on by region		
Region sourced	Physical appearance	Composition
North Sea	transparent liquid	high concentrations of
		paraffins and napthenes
Eastern Asia	solid	high concentrations of
(e.g., China, Indonesia)		paraffins and napthenes
Arabian	dark brown	medium concentrations of
	high viscosity liquid	paraffins and napthenes
Nigerian	dark brown	high concentrations of
-	high viscosity liquid	napthenes and aromatics
South American	black solid	high concentrations of
		napthenes and aromatics

Source: EFSA 2012

78 79

77

80 While mineral oil formulations vary based on the petroleum crude oil and refining methods used, the mineral oil

81 pertaining to veterinary applications is highly refined and known in the literature as "white mineral oil"

82 (although "mineral oil" is also used interchangeably) (EPA 2009, EFSA 2012, IARC 2012). White mineral oil is

used in food and medical applications and undergoes greater refinement to remove aromatic compounds,

84 including polycyclic aromatic hydrocarbons (PAHs) (EPA 2009, EFSA 2012). Since only highly refined mineral oil

is used in veterinary applications, the use of mineral oil throughout the remainder of this report refers to highly

86 refined (i.e., white) mineral oil unless otherwise specified. As with less refined products, the exact composition of

87 mineral oil varies, although paraffins are generally a major component and the remaining components are

88 napthenes (IARC 2012).

89

90 Source or Origin of the Substance:

91 Mineral oil is named according to the mineral sources (fossil fuels) from which it derives and is isolated as

a product from crude oil. Mineral oil is isolated from crude oil through a variety of refining processes,

93 including atmospheric and vacuum distillation, dewaxing, acid treatment (oleation), and hydro-treatment

94 (EPA 2009, EFSA 2012, IARC 2012). These processes remove heavy metals, oxygen, nitrogen, sulfur organic

compounds, aromatic compounds, and other impurities (EFSA 2009, EFSA 2012). Evaluation Question 2 of

96 this report discusses these processes in more detail.

97

98 **Properties of the Substance:**

99 The properties of mineral oil vary based on its composition, which is determined by the petroleum source

100 and refining methods used (described previously in the "Composition of the Substance" section). General

101 properties of mineral oil – including less refined mineral oils – are displayed below in Table 2.

102

103

Table 2	2.	Pro	perties	of	mineral	oil
I ubic 4	-•	110	perties	UI.	miniciai	UI1

Property	Mineral oil
CAS Nos.	64742-47-8, 8042-47-5, 8012-95-1, 8020-83-5,
	64742-55-8, 64742-56-9, 64742-65-0, 72623-84-8,
	72623-86-0, 72623-87-1, 8012-95-1, 8042-47-5
Physical appearance	clear/pale yellow liquid
Odor	odorless, odor of lanolin
Molecular weight	28.2-843.6 g/mol
Number of carbon atoms	C9-C60
Melting point	< 0 °C
Boiling point	150–894 °C
Flash point	168.33 °C
Specific gravity	0.79–0.94 at 15.6 °C
Vapor pressure	<0.1 kPa at 20 °C, <1mmHg at 20 °C
Solubility	insoluble in water,
	soluble in ethanol and hydrocarbons

Sources: PC 2017a, PC 2017b, SL 2005, EPA 2007, EPA 2009, EFSA 2009, EFSA 2012, Geritrex 2014, APS 2015

106 Specific Uses of the Substance:

- 107 Mineral oil is used in many applications across a variety of industries, including metal work and
- 108 fabrication, lubricants, pesticides, cosmetics, food processing, and pharmaceuticals (EFSA 2012, IARC
- 109 2012). The highly refined mineral oils that are the focus of this report are used as a laxative for both
- 110 humans and animals (EFSA 2012, MP 2019).
- 111

112 In livestock production, mineral oil is used to treat colic, constipation, ruminal bloat, and impaction or

- 113 compaction within the digestive tract (White and Dabareiner 1997, Lopes et al. 1999, Costello 2005, El-
- shafaey 2007, Athar et al. 2011). Mineral oil is used to treat large colon impactions, which are the leading
- cause of colic (Lopes et al. 1999, Blikslager 2005). When used for large colon impactions, mineral oil is
- administered in doses from 0.5–1.0 gallon (Blikslager 2005). Laxatives, including mineral oil, can be used in early stage colic treatments in ruminants to remove digestive tract blockages that cause colic. The use of
- mineral oil or other laxatives are often combined with intravenous saline infusions and analgesics (ACVS,
- 119 White and Dabareiner 1997).
- 120

121 Mineral oil can also be used as a preventative measure against colic in horses, and it may be added to the

- abomasum cavity of ruminants to treat rare abomasal impactions (White and Dabareiner 1997, Blikslager
- 123 2005, Shafaey 2007, Athar et al. 2011). Mineral oil is used as a lubricant for esophageal tubes to relieve
- 124 pressure from trapped gas in cases of ruminal bloat (Costello 2005). Mineral oil is also used to treat ileal
- impactions in horses as an alternative to surgery (Hanson et al. 1996), and it is administered in equine ileal
- impactions when the combination of IV fluids and analgesics fails to promote a gastral reflex (Hanson et al.1996). While mineral oil is generally administered orally, it may also be administered rectally or directly
- 12. The function of the generally definitistered of any, it may also be administered feetally through surgical access points during some procedures (El-shafaey 2007, Athar et al. 2011).
- 129

130 Approved Legal Uses of the Substance:

The USDA NOP lists mineral oil as a "synthetic substance allowed for use in organic livestock production,
for treatment of intestinal compaction, prohibited for use as a dust suppressant" and "for topical use and as
a lubricant" in 7 CFR 205.603.

133

The United States Food and Drug Administration (FDA) allows mineral oil to be used as a component in animal feeds, provided that it "not exceed 3.0 percent in mineral supplements, nor shall exceed 0.06 percent of the total ration when present in feed or feed concentrates," as stipulated in 21 CFR 573.680. Mineral oil may be used as an animal feed ingredient:

- 139 "to reduce dustiness of feeds or mineral supplements."
- "to serve as a lubricant in the preparation of pellets, cubes, or blocks and to improve resistance to moisture of such pellets, cubes, or blocks."
 - "to prevent segregation of trace minerals in mineralized salt."
 - "to serve as a diluent carrier in the manufacture of feed grade biuret in accordance with good manufacturing practice."
- 144 145 146

142

143

"for the removal of water from substances intended as ingredients in animal feed."

147 The FDA also allows the use of mineral oil in animal drugs, including the following:

- as a component of bambermycins accounting for up to 1.00% (21 CFR 668.95)
- as a component of fenbendazole accounting for up to 1.00% (21 CFR 558.258)
- as a component of lasalocid accounting for up to 1.05% (21 CFR 558.311)
- 150 151

148 149

152 The FDA, as stipulated in 21 CFR 369.20, requires mineral oil laxatives to bear the following warning: 153 "*Caution* – Take only at bedtime. Avoid prolonged use. Do not administer to infants or young children, in 154 pregnancy, or to bedridden or aged patients unless directed by a physician." The FDA allows the use of 155 mineral oil in several over the counter medicines for human use including the following:

mineral oil in several over-the-counter medicines for human use, including the following:

- as a skin protectant active ingredient (21 CFR 347.10) (when used in skin protection formulations, the warning "for external use only" must be applied to the label, unless "oral use of the product is also provided," as stipulated in 21 CFR 347.50)
- in either mineral oil or light mineral oil forms in ophthalmic emollients, with the limitation of "up to 50 percent in combination with one or more other emollient agents" (21 CFR 349.14)

161 162	• as a protective active ingredient in anorectal drugs (21 CFR 346.14)
162 163 164	The FDA has designated white mineral oil as a substance that "may be safely used in food" in 21 CFR 172.878. The FDA lists many food applications for white mineral oil in § 172.878, including as a "release
165 166	agent, binder, or lubricant" in many food applications, as a "defoamer," and as a dust control agent in food processing. The FDA allows mineral oil to be used as an ingredient in food-grade biuret with a 0.5%
167 168	maximum in 21 CFR 573.220.
169	The FDA allows the use of mineral oil and white mineral oil in several components of food and drug
170	packaging, including in 21 CFR 175.105, § 175.210, § 176.200, CFR 176.210, § 173.340, § 177.1310, and §
171	177.1620, § 177.2260, § 177.2600, § 177.2800, § 176.170, § 175.230, § 175.300, § 173.340, § 177.1200, and §
172	178.3740. The FDA allows the use of mineral oil in several applications as an "indirect food additive,
173	adjuvant, production aid, and sanitizer," including in § 178.3570, § 178.3620, § 178.3910, and § 178.3910.
174	The EDA normits the use of technical white mineral oil "wherever mineral oil is permitted for use as a
175	component of ponfood articles complying with 21 CER Parts 175 105, 176 200, 176 210, 177 2260, 177 2600
170	177 2800 178 3570 and 178 3910" in 21 CFR 178 3570
178	177.2000, 170.0070 and 170.0070 in 21 CIR 170.0070.
179	The United States Environmental Protection Agency (EPA) lists mineral oil and white mineral oil as an
180	"inert ingredient[s] permitted in minimum risk pesticide products" for "pesticides of a character not
181	requiring FIFRA regulation" in 40 CFR 152.25.
182	
183	The United States Animal and Plant Health Inspection Service allows the use of mineral oil as a lubricant
184	"that is applied to the limbs of a horse sorely for protective and lubricating purposes while the horse is
185	being shown or exhibited at a horse show, horse exhibition, horse sale or horse auction" in 9 CFR 11.1.
186 187	Action of the Substance
188	The organic livestock applications of mineral oil are due to its lavative properties. The lavative nature of
189	mineral oil is due to its low absorption and bioavailability, causing it to remain within the digestive tract
190	until excretion, usually in feces (EPA 2009, EFSA 2009, EFSA 2012). Since mineral oil is poorly absorbed
191	and metabolized, it lines the walls of the digestive tract and acts as a lubricant, which is its primary mode
192	of action (Flomenbaum et al. 2002, Blikslager 2005, EPA 2009, Athar et al. 2011, HMHW 2014). The
193	lubricating nature of mineral oil is used to treat blockages within the digestive tract, ranging from fecal
194	matter, to undigested roughage and feeds, to foreign objects (Blikslager 2005, El-shafaey 2007, Athar et al.
195	2011). The poor water solubility of mineral oil also acts as a barrier for water movement, which prevents
196	the loss of water from fecal matter, preventing stools from hardening. Mineral oil has been reported to
197	further soften fecal matter in the colon prior to excretion (El-shafaey 2007).
198	Combinations of the Substance
199 200	<u>Combinations of the Substance.</u> When mineral oil is used as a laxative for the treatment of constinution and digestive blockages, it is
200	generally administered alone and in its pure form (>99%): however, some reports indicate that it has been
202	given as a water emulsion (El-shafaev, 2007, Athar et al. 2011).
203	
204	When used to treat colic and ileal impactions in horses and ruminants, mineral oil is typically administered
205	in combination with analgesics (e.g., flunixin meglumine) and intravenous (IV) delivery of saline or other
206	fluids (ACVS, Hanson et al. 1996, Lopes et al. 1999). Mineral oil is co-applied with IV fluids and analgesics
207	because of the complimentary nature of the three treatments (White and Dabareiner 1997, Bilkslager 2005).
208	IV fluid treatments provide hydration to digestive blockages, which are often dry matter. Hydration of the
209	blockage promotes structural change and allows it to change shape and exit the digestive tract (White and

- 210 Dabareiner 1997, Lopes et al. 1999, Athar et al. 2011). Analgesics are used primarily to relieve the pain that
- 211 accompanies impactions and colic. The pain associated with these conditions is related to intestinal spasms
- 212 and contractions around the blockage, which can cause intermittent pain (White and Dabareiner 1997,
- 213 Bilkslager 2005).
- 214

Status

216217 Historic Use:

215

Mineral oil has been recognized for its laxative effects in both human and animal treatments. Mineral oil is 218 a common treatment for a variety of livestock digestive blockages and impactions as well as colic (Lopes et 219 220 al. 1999, Costello 2005, El-shafaey 2007, Athar et al. 2011). Mineral oil is allowed in organic livestock 221 production to treat intestinal compaction and for use as a topical lubricant in 7 CFR 205.603. Mineral oil has 222 also been used in conventional agricultural production as an animal feed additive and as a dust 223 suppressant (EFSA 2009, EFSA 2012). 224 225 **Organic Foods Production Act, USDA Final Rule:** 226 Mineral oil is not listed in the Organic Foods Production Act of 1990. The USDA NOP lists mineral oil as a 227 "synthetic substance allowed for use in organic livestock production, for treatment of intestinal 228 compaction, prohibited for use as a dust suppressant" and "for topical use and as a lubricant" in 7 CFR 229 205.603. 230 231 International: 232 233 Canada - Canadian General Standards Board Permitted Substances List 234 Mineral oil is listed in the Canadian General Standards Board Permitted Substances List in Table 5.3 as a "Health care product and production aid" and is permitted "for external use." 235 236 237 CODEX Alimentarius Commission, Guidelines for the Production, Processing, Labelling and Marketing 238 of Organically Produced Foods (GL 32-1999) 239 Mineral oil is listed in Table 2 of the CODEX as a "substance for plant, pest and disease control" under the subcategory "traps." Paraffin oil is also listed in Table 2 of the CODEX in the subcategory "mineral." 240 241 242 European Economic Community (EEC) Council Regulation, EC No. 834/2007 and 889/2008 243 Mineral oil is listed in EC No. 889/2008 as an insecticide and fungicide that is limited for use "only in fruit 244 trees, vines, olive trees and tropical crops (e.g., bananas)." Paraffin oil is also listed in EC No. 889/2008 as 245 an insecticide and aracnacide. 246 247 Japan Agricultural Standard (JAS) for Organic Production Mineral oil is not listed in the JAS. 248 249 250 International Federation of Organic Agriculture Movements (IFOAM) Mineral oil is listed in the IFOAM in Appendix 3 as a "crop protectant and growth regulator." 251 252 253 Evaluation Questions for Substances to Be Used in Organic Crop or Livestock Production 254 255 256 Evaluation Question #1: Indicate which category in OFPA that the substance falls under: (A) Does the 257 substance contain an active ingredient in any of the following categories: copper and sulfur compounds, 258 toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, 259 vitamins and minerals; livestock parasiticides and medicines and production aids including netting, 260 tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the 261 substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern 262 (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which 263 is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? 264

A) Mineral oil is a medicine that is used in organic livestock production, primarily for its laxative
 properties. When mineral oil is used for veterinary purposes, it is highly refined to remove crude oil

267 contaminants and potentially hazardous aromatic compounds (EPA 2009, EFSA 2009, EFSA 2012).

- 268 Additionally, mineral oil is used in conventional agriculture as a parasiticide for mite control, primarily in 269 poultry production. 270 271 B) Mineral oil in the form of "white mineral oil (petrolatum) 8042-47-5" is on the EPA List 4 inerts. 272 Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the 273 274 petitioned substance. Further, describe any chemical change that may occur during manufacture or 275 formulation of the petitioned substance when this substance is extracted from naturally occurring plant, 276 animal, or mineral sources (7 U.S.C. § 6502 (21)). 277 278 Mineral oil is a substance that is produced by refining petroleum crude oil (EPA 2007, EFSA 2012, IARC 279 2012). The final composition of mineral oil is determined by the source of the crude oil as well as the 280 specific refining conditions used (EFSA 2012, IARC 2012). Prior to the refining process, the petroleum 281 crude oil is desalted and fractionated to various boiling points (EFSA 2009, EFSA 2012, Wright 2012). In the 282 desalting process, crude oil is washed with water to remove salts, minerals, and heavy metals that may be 283 present in the crude oil (EFSA 2009, Wright 2012). The salts (ionic compounds) are more soluble in water 284 than in the hydrophobic hydrocarbon crude oil mixture, enabling their migration from the crude oil into 285 the water washes (EFSA 2009, Timberlake 2016). 286 287 After the desalting process, the crude oil is fractionated by heating from 350–380 °C, at or around 288 atmospheric pressure, to allow for separation of groups of compounds based on their boiling points (EFSA 289 2009, EFSA 2012, IARC 2012, Wright 2012). The desalting process removes water soluble salts, 290 predominantly sodium chloride (NaCl) and magnesium chloride (MgCl₂). Salt removal prevents corrosion 291 of refining equipment and improves crude oil purity (Abdul-Wahab et al. 2006). The fractionating process 292 uses a large fractional distillation column to allow for many evaporation and condensation cycles, known 293 as theoretical plates, which enhances the separation process (Timberlake 2016). The fractionating process 294 effectively separates crude oil into hydrocarbons with similar sizes, as the size of the carbon chain directly 295 influences the boiling point of each substance (Wright 2012, Timberlake 2016). Mineral oil is produced from 296 relatively heavy distillates, typically varying between 9 and 40 carbons (EPA 2009, EFSA 2012). Once the 297 distillate has been isolated from the crude, it undergoes the deasphalting process (Wright 2012). In this 298 process, propane is used as an extraction solvent to remove any tar from the distilled fraction (Wright 299 2012). In some refining processes, tars are removed from vacuum distillation processes, rather than 300 through deasphalting (EFSA 2009, EFSA 2012). 301 302 Once the base of compounds that make up mineral oil are separated from the crude oil by the desalting 303 and fractionating processes, they are refined to produce the final product. The general refining process is 304 discussed below, although specific refining processes and conditions vary between producers and mineral 305 oil formulations (EFSA 2012). 306 307 Mineral oil was traditionally refined through solvent extractions followed by the oleation process (EFSA 308 2012, Wright 2012). In the solvent extraction process, the fractionated distillate is extracted with various 309 solvents, including phenol, furfural, or sulfur dioxide, to remove aromatic compounds (Wright 2012).
- Following the removal of these compounds, the remaining substance is primarily composed of paraffin
- and napthene compounds (Wright 2012). While the solvent extraction removes most of the aromatic
- 312 compounds, as much as 20% may remain in the mineral oil at this stage (EFSA 2012, Wright 2012).
- 313
- 314 In traditional refining, solvent extraction is followed by oleation, or acid refining. Oleation is the treatment
- of the extracted substances with fuming sulfuric acid (EFSA 2009, IARC 2012, Wright 2012). The
- 316 concentrated acid treatment is used as a means of hydrogenation, converting compounds with carbon-
- carbon double bonds into saturated hydrocarbons (EFSA 2009). The oleation process is not often used for
- the production of modern mineral oil due to the large quantities of acid sludge byproducts formed in the
- 319 process (EFSA 2009, Wright 2012). These byproducts pose an environmental hazard and must be properly
- 320 treated for disposal (Wright 2012).

322 In modern mineral oil production, the refining process often includes a second distillation process to 323 remove any impurities that may have been carried by the distillate from neighboring fractions. Unlike the 324 initial fractionating process, additional distillations are typically performed under vacuum to reduce the 325 temperatures required in the process (IARC 2012). 326 327 Modern refining of mineral oil may still include the use of a solvent extraction step for the removal of 328 aromatic compounds (EFSA 2012, Wright 2012). However, in these modern mineral oil production, solvent 329 extraction is followed by further refining to eliminate aromatic compounds to trace levels (EFSA 2012, 330 IARC 2012, Wright 2012). These additional refining steps may include dewaxing, which removes more viscous compounds and waxes, as well as the majority of remaining aromatic substances (EFSA 2012, 331 332 Wright 2012). 333 334 Most refining processes replaced the oleation process with hydrocracking in the 1960s (EFSA 2009, IARC 335 2012). In the hydrocracking process, the mineral oil is subjected to high temperatures (300-420 °C) under 336 high pressures of hydrogen gas (3000 psi) in the presence of a metallic or zeolite catalyst (EFSA 2009, EFSA 337 2012, Wright 2012). The extreme conditions of hydrocracking processes hydrogenate unsaturated 338 compounds, and convert aromatic compounds and napthenes to saturated hydrocarbon chains (EFSA 2009, 339 EFSA 2012, Wright 2012). After the completion of hydrocracking processes, aromatic compounds have 340 been reduced to trace levels, and paraffins have become the primary component of the mineral oil (EFSA 341 2009, EFSA 2012, Wright 2012). 342 343 The final step in most mineral oil refinement is hydrotreating. This process is similar to hydrocracking, 344 although under less extreme conditions. In hydrotreating processes, the mineral oil is subjected to 345 hydrogen gas and metallic catalysts to ensure complete saturation (EFSA 2009, EFSA 2012, IARC 2012, Wright 2012). This process is important due to the extreme conditions associated with hydrocracking. The 346 347 high pressures and temperatures of hydrocracking break apart the ring structures of aromatic compounds 348 and napthenes, and carbon – carbon double bonds may be formed in the process (Wright 2012). 349 Hydrotreating ensures that any points of unsaturation introduced during the refining process are 350 hydrogenated to give complete chemical saturation (Wright 2012). 351 352 Evaluation Question #3: Discuss whether the petitioned substance is formulated or manufactured by a 353 chemical process, or created by naturally occurring biological processes (7 U.S.C. § 6502 (21)). 354 As described in Evaluation Question 2, mineral oil is a synthetic substance that is manufactured by refining 355 crude oil. Some of the compounds in mineral oil exist in crude oil, while others are produced in the refining 356 357 process. The refining process isolates a mixture of hydrocarbons in crude oil based on their physical 358 properties (e.g., vapor pressure, boiling point, solubility) (EFSA 2009, EFSA 2012, IARC 2012). During the 359 isolation process, organic compounds that include oxygen, nitrogen, sulfur, and other impurities are 360 removed through various purifications processes or reactions (EFSA 2009, EFSA 2012). During the refining process, the isolated hydrocarbons undergo a hydrogenation process to replace any existing multiple 361 bonds with additional carbon - hydrogen single bonds to produce the completely saturated compounds 362 363 that make up mineral oil (EFSA 2009, EFSA 2012).

364

365Evaluation Question #4: Describe the persistence or concentration of the petitioned substance and/or its366byproducts in the environment (7 U.S.C. § 6518 (m) (2)).

367

At the time of this report, the author did not find environmental studies on highly refined mineral oil. The EPA has reported that mineral oil has a short environmental lifetime of 2–3 days in aquatic environments

370 (EPA 2007). The low vapor pressure and water solubility of mineral oil makes it unlikely to migrate within

the environment (EPA 2007). The low solubility and volatility of mineral oil makes it most likely to be

found in the soil or other terrestrial environments, where it is broken down through metabolic processes

373 (EFSA 2012). Mineral oil has a longer environmental lifetime in soil, where it undergoes slow

biodegradation (EPA 2007, EFSA 2012). The environmental persistence of mineral oil metabolites are not

375 quantifiable due to the variety of possible compounds and their ubiquitous nature within the environment,

376 but are not thought to bioaccumulate (EFSA 2012).

377

- 378 Sodium and magnesium chlorides are the predominant solutes in desalting effluents (Abdul-Wahab et al.
- 2006). Both sodium and magnesium chloride salts are prevalent in nature and can be found in mineral
 formations and seawater (Atkins et al. 2008). Given the ubiquitous presence of these salts in nature, their
- 381 environmental concentrations from desalting crude oil are not readily quantifiable.
- 382

383 Aromatic molecules are cyclic hydrocarbons that are thermodynamically stable due to their delocalized pi-384 electrons, which dramatically reduce their reactivity (Baird and Cann 2008, Timberlake 2016). The identity 385 of aromatics in crude oil is variable based on the region of origin (discussed above in the "Composition of 386 the Substance" section) (EFSA 2012, IARC 2012, Serio and Levine 2015). Aromatic compounds are likely to 387 undergo oxidation in the environment, converting to more polar aromatic derivatives including quinones and phenolic compounds. Aromatic compounds and their oxidized derivatives can be further degraded 388 389 into small hydrocarbon metabolites by microorganisms (Serio and Levine 2015). Aromatic molecules pose a 390 hazard to aquatic environments due to their long environmental lifetimes. The stability of aromatic 391 molecules in aquatic environments may result in their bioaccumulation in fish and other marine animals 392 (Baird and Cann 2008).

393

As discussed in Evaluation Question 2, most modern refining processes have replaced oleation due to environmental concerns related to acidic byproducts. Oleation processes use fuming sulfuric acid to

- 395 environmental concerns related to actuc by products. Oreation processes use running surfuric actu to 396 hydrogenate unsaturated hydrocarbons. Sulfuric acid is a strong acid that can lower the pH of water and
- terrestrial systems if not properly neutralized (Atkins et al. 2008, Baird and Cann 2008). Because of the
- highly reactive nature of sulfuric acid, it is readily converted to more stable hydrogen sulfate (HSO₄·) and
- sulfate ions (SO_4^2). Hydrogen sulfate and sulfate ions are found in many biological molecules and are
- 400 prevalent in the environment (Baird and Cann 2008).
- 401

402 <u>Evaluation Question #5:</u> Describe the toxicity and mode of action of the substance and of its breakdown 403 products and any contaminants. Describe the persistence and areas of concentration in the environment 404 of the substance and its breakdown products (7 U.S.C. § 6518 (m) (2)).

- As described above in Evaluation Question 4, mineral oil undergoes slow biodegradation in terrestrial and
 soil environments, although the substance has a short aquatic lifetime of two to three days (EPA 2007).
 Mineral oil is generally non-toxic in the environment (EPA 2007, EFSA 2012). The EPA has stated that
 mineral oil is not hazardous to mammals, birds, honey bees, and aquatic life, with a few exceptions (EPA
 2007). Mineral oil metabolites have also been designated as non-toxic and form a variety of compounds
 that are biologically ubiquitous (EPA 2007, EFSA 2012).
- 412

Mineral oil is non-toxic to mammals and birds, except in cases where it is applied directly to bird eggs
(EPA 2007). In these cases, mineral oil may have a hazardous effect by preventing airflow through the
eggshell (EPA 2007). Mineral oil is non-toxic to fish, shrimp, and other marine invertebrae (EPA 2007). One
study reported that fish can survive a 50/50 mixture of mineral oil and water (EFSA 2012). However,
mineral oil may be hazardous to oysters, as it may disrupt their ability to metabolize nutrients (EPA 2007).
Mineral oil may also be hazardous to water fleas (*Daphina magna*), which may be suffocated when coated in
mineral oil; coating is the mode of action of pesticides and parasiticides against mites and mosquitos (EPA

- 420 2007, EFSA 2012).
- 421

There have been previous reports of mineral oil phytotoxicity; however, these reports predate industry changes to mineral oil refining (EPA 2007). Some PAHs and other aromatic compounds have been reported to have phytotoxic properties, but these are generally removed in modern mineral oil formulations through additional refining steps (EPA 2007, EFSA 2009, EFSA 2012, IARC 2012). In an EPA evaluation of mineral oil for pesticide use, the agency stated that it "does not have concerns for phytotoxicity." They cited the heavy application of mineral oil in pesticides without adverse effects since the general changes in

- 428 manufacturing have resulted in aromatic compounds being removed or decreased to trace amounts (EPA
- 429 2007, EFSA 2012).
- 430

431 Since mineral oil is poorly absorbed in mammals, it is likely to be excreted in the manure of treated 432 livestock (EPA 2009). As described in Evaluation Question 4, mineral oil is unlikely to migrate from the 433 manure into other environments (EPA 2007). The highly refined mineral oil used in veterinary applications 434 does not contain aromatic compounds and would not be expected to contribute to environmental contamination (EPA 2007, EPA 2009, EFSA 2012). 435 436 437 Evaluation Question #6: Describe any environmental contamination that could result from the 438 petitioned substance's manufacture, use, misuse, or disposal (7 U.S.C. § 6518 (m) (3)). 439 440 As described in Evaluation Questions 4 and 5, mineral oil and its metabolites may have relatively long 441 environmental lifetimes but are generally non-toxic. The EPA has approved mineral oil for direct application to both terrestrial and aquatic systems as a pesticide (EPA 2007, EFSA 2012). The EPA has 442 classified mineral oil as having low acute toxicity to plants and animals within the environment and stated 443 444 that it is unlikely to migrate from its initial place of application (EPA 2007). The highly refined mineral oil 445 used in veterinary applications is even less likely to be a source of environmental contamination because in 446 this application, potentially harmful aromatic compounds are completely removed (EPA 2007, EPA 2009, 447 EFSA 2012). 448 449 Environmental contamination may occur during extraction and transportation of the crude oil through 450 accidental releases (e.g., oil spills, contamination from fracking) (EIA 2020). As discussed in Evaluation 451 Question 2, the refining process may involve harsh chemicals (e.g., fuming sulfuric acid), the byproducts of which must be carefully handled to prevent environmental contamination (EPA 2009, EFSA 2009, IARC 452 453 2012, Wright 2012). Aromatic compounds that are removed from crude oil during refining processes pose 454 water pollution risks and may bioaccumulate in fish and other marine animals. Accumulation of aromatic 455 compounds has been reported to produce liver lesions and tumors in some fish (Baird and Cann 2008). The 456 refining process is the third largest producer of greenhouse gases and other atmospheric pollutants, 457 including carbon dioxide (CO₂), methane (CH₄), and reactive nitrogen oxides (e.g., nitric oxide [NO], 458 nitrous oxide [N₂O]) (EPA 2013). 459 460 Evaluation Question #7: Describe any known chemical interactions between the petitioned substance 461 and other substances used in organic crop or livestock production or handling. Describe any environmental or human health effects from these chemical interactions (7 U.S.C. § 6518 (m) (1)). 462 463 464 There have been some reports that the administration of mineral oil to humans may prevent the proper absorption of nutrients such as vitamins and minerals (Weinstein 2001, Gal-Ezer and Shaoul 2006, EPA 465 2009, HMHW 2014). However, these reports have been controversial, and possible interactions between 466 mineral oil and nutrients are disputed in the literature (Gal-Ezer and Shaoul 2006, EPA 2009). Despite the 467 disputed nature of these claims, it is recommended that mineral oil laxatives for humans be administered 468 469 between meals or before bedtime to prevent potential interference with nutrient absorption (Baker et al. 470 1999, Weinstein 2001, Gal-Ezer and Shaoul 2006). Based on the current literature, it is possible that mineral 471 oil may interfere with nutrient absorption in livestock that are undergoing active mineral oil treatment.

472

473Evaluation Question #8: Describe any effects of the petitioned substance on biological or chemical474interactions in the agro-ecosystem, including physiological effects on soil organisms (including the salt475index and solubility of the soil), crops, and livestock (7 U.S.C. § 6518 (m) (5)).

476

As described in Evaluation Questions 4 and 7, mineral oil is unlikely to have meaningful interactions with

the agro-ecosystem. Mineral oil is unlikely to migrate from the manure of treated animals (EPA 2007, EFSA
2012). The chemical saturation of the compounds that make up mineral oil are generally unreactive and are

2012). The chemical saturation of the compounds that make up mineral oil are generally unreactive and areunlikely to promote chemical and biological processes other than their metabolism (Timberlake 2016).

481 Mineral oil is generally non-toxic to both plants and animals and is unlikely to have effects on crops (EPA

482 2007). As detailed in Evaluation Question 7, mineral oil my interfere with absorption of nutrients by the

483 treated livestock, although this requires further research for verification (Weinstein 2001, Gal-Ezer and

484 Shaoul 2006, EPA 2009). Mineral oil has a laxative effect in mammals, although this effect is therapeutic

485 and is the purpose of its administration to livestock.

486	
487	Evaluation Question #9: Discuss and summarize findings on whether the use of the petitioned
488	substance may be harmful to the environment (7 U.S.C. § 6517 (c) (1) (A) (i) and 7 U.S.C. § 6517 (c) (2) (A)
489	(i)).
490	
491	As described in Evaluation Questions 4–8, mineral oil may be relatively long-lived, but it has a low acute
102	toxicity in the environment. The highly refined form of mineral oil used for veterinary applications has no
402	aromatic compounds and has limited use in relatively small quantities (EDA 2007 EDA 2000 EESA 2000
493	EEG (2012) Civen the level of mineral ail number its uses and its new toyic nature, it scores unlikely to be
494	EFSA 2012). Given the level of himeral on purity, its uses, and its non-toxic nature, it seems uninkery to be
495	the source of environmental contamination when used for veterinary applications (EFSA 2012).
496	
497	Evaluation Question #10: Describe and summarize any reported effects upon human health from use of
498	the petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (1), 7 U.S.C. § 6517 (c) (2) (A) (1)) and 7 U.S.C. § 6518
499	(m) (4)).
500	
501	Mineral oil is generally not absorbed by humans, although absorbed mineral oil is metabolized to fatty
502	acids and components of lipid compounds or acidic compounds that are excreted in urine (Gal-Ezer and
503	Shaoul 2006, EPA 2009, EFSA 2009, EFSA 2012). Mineral oil has laxative effects in humans, although this
504	effect is often therapeutic and the purpose of the mineral oil product (HMHW 2014). Mineral oil used in
505	laxative formulations is generally made up of larger and less bioavailable compounds, which prevents
506	absorption and improves the laxative effect (EFSA 2012).
507	
508	As described in Evaluation Ouestion 7, mineral oil has been reported to interfere with the absorption of
509	nutrients. While the veracity of these interactions is debated in the literature, mineral oil laxatives are
510	recommended to be taken between meals or before bedtime (Baker et al. 1999, Weinstein 2001, Gal-Ezer
511	and Shaquil 2006 FPA 2009)
512	
512	Aspiration of mineral oil dronlets is a rare but serious and notentially fatal risk (Weinstein 2001)
514	Aspiration may occur when the airway is not clear or when mineral oil mists are encountered and have
515	heen reported to cause lippid pnoumonitis and pnoumonia (Wainstain 2001, Cal Ezer and Shaqul 2006
515	LIMETAL 2014 MD 2010)
510	11011100 2014, 1011 2019).
517	
518	The highly refined mineral oil discussed in this technical report has shown no signs of mutagenicity,
519	carcinogenicity, or the potential to cause other adverse effects (IARC 1987). Highly refined mineral oil has
520	been designated as a group 3 substance, which are "not classifiable as to their carcinogenicity to humans"
521	by the International Agency for Research on Cancer (IARC) (IARC 1987).
522	
523	Highly refined mineral oils are included in a range of food and pharmaceutical products with long-term
524	doses of up to 100 mL/day without causing adverse effects in humans (EFSA 2012). A case of long-term
525	human overdose with no adverse effect has been reported at 400 mL daily over the course of 5 months
526	(Gal-Ezer and Shaoul 2006). This daily dosage dramatically exceeded the recommended daily dose by 100-
527	400X without the patient showing adverse effects or disruption to nutrient absorption (Gal-Ezer and
528	Shaoul 2006).
529	
530	Crude and less refined mineral oils have been designated as group 1 substances and designated as
531	"carcinogenic to humans" by the IARC, likely due to the PAHs that remain within mineral oils with limited
532	refinement (IARC 1987, IARC 2012). Most cancer cases linked to mineral oil with limited refining are skin
533	and scrotal cancer (IARC 1987, IARC 2012) These cancer cases are predominantly linked to industrial
534	lubricant applications where the mineral oil is aerosolized (IARC 2012). However, these cases often include
535	the inhalation of other notantially carcinogenic substances, making the role of mineral oil lubricants
536	difficult to conclude (LARC 2012)
530	
529	Evaluation Augstion #11. Describe all natural (non eventhetic) substances or products which many ba
538 539	used in place of a petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (ii)). Provide a list of allowed

540 substances that may be used in place of the petitioned substance (7 U.S.C. § 6518 (m) (6)).

541

There are a variety of natural substances that may provide laxative and digestive lubricating effects. The 542 543 most similar substances to mineral oil have similar chemical compositions but are derived from natural, 544 plant-based sources. These include vegetable oil, olive oil, and other agricultural oils, which, like mineral 545 oil, act to line the digestive tract to provide lubrication for blockages (Berry 2018). However, these substances differ in structure from mineral oil as they are not necessarily chemically saturated (Timberlake 546 547 2016). The points of chemical unsaturation found in the presence of carbon-carbon double bonds in the structure make these compounds more reactive and more easily metabolized (Timberlake 2016). The more 548 549 rapid metabolism of these compounds will likely shorten their environmental lifetimes and further reduce 550 the potential for bioaccumulation from the already-low levels in mineral oil. However, the metabolic 551 activity of these alternative oils are also likely to make them less effective as a digestive lubricant due to

- 552 their higher bioavailability.
- 553

Castor oil is a natural alternative to mineral oil for laxative applications. Castor oil is produced as a vegetable oil pressed from castor beans. Unlike the oils described above, the laxative effects of castor oil are based on the production of a metabolite, ricinoleic acid (Williams 2012). Ricinoleic acid acts as an intestinal stimulant, which promotes gastric reflexes (Williams 2012). Like mineral oil, castor oil may reduce the absorption of nutrients, including vitamins A, D, E, and K (CC 2021).

559

560 The USDA NOP has also approved the use of flunixin as "synthetic substances allowed for use in organic 561 livestock production" in 7 CFR 205.603. Flunixin meglumine is a non-steroidal analgesic with noted 562 anti-inflammatory and antipyretic activity (USDA 2007). Flunixin is administered for treatment of equine 563 colic as a pain reliever and to prevent gastric rupture (USDA 2007). While flunixin meglumine is a possible alternative to mineral oil for treatment of colic in horses, it is often used in combination with mineral oil, as 564 565 the substances have different effects (Hanson et al. 1996, Lopes et al. 1999). Additionally, flunixin 566 meglumine does not offer an alternative to mineral oil for laxative applications in the treatment of 567 constipation, ruminant bloat, and some digestive blockages. 568

569 The USDA NOP has also approved the use of magnesium sulfate as a "synthetic substances allowed for use in organic livestock production" in 7 CFR 205.603. Magnesium sulfate is an alternative to mineral oil for 570 laxative applications in livestock and is typically mixed with water and administered orally (Blikslager 571 572 2005, USDA 2011). Magnesium sulfate is a more potent laxative than mineral oil and works through a different mode of action (Blikslager 2005). Rather than acting as a digestive lubricant, magnesium sulfate 573 574 softens fecal matter by increasing water absorption within the fecal blockage (Blikslager 2005). Magnesium 575 sulfate is also associated with electrolyte imbalances, including hypermagnesemia, and requires more 576 careful dosing than mineral oil (Blikslager 2005).

578 <u>Evaluation Question #12:</u> Describe any alternative practices that would make the use of the petitioned 579 substance unnecessary (7 U.S.C. § 6518 (m) (6)). 580

581 Compaction of the digestive tract may occur for many reasons but has been reported to be closely linked to 582 quality of animal feeds. Literature reports cite ingestion of feeds or roughage that are high in undigestable 583 materials (e.g., lignin, sand) as potential reasons for impaction or compaction (Hanson et al. 1996, Athar et 584 al. 2011). The source of the undigestable material may be the vegetation/pasture of the animal or 585 contamination due to improper storage or harvesting of animal feeds (Hanson et al. 1996, Lopes et al. 1999). 586 Given the link between the presence of undigestable materials and digestive compaction and impaction, 587 one alternative practice is to ensure that feeds have low quantities of indigestible material and are free from 588 potential contaminants.

589

577

In some cases, compaction is not related to animal feeds, or feed alternatives may not be readily available.
In these cases, there are relatively few alternative practices, as administration of mineral oil is a standard

treatment for colic, compaction, and impaction (Lopes et al. 1999, Athar et al. 2011). A study by Lopes

- 593 found that endermal fluid treatments of either water or saline solutions had similar success to traditional
- 594 mineral oil and was more effective in cases of fecal hydration (Lopes et al. 1999). Endermal fluid treatments
- 595 for colic consisted of warm tap water (35 °C), with doses that varied between 85-350 mL/kg (Dabareiner

596 597 598 599	and White 1995, Lopes et al. 1999). IV treatments with water and saline solutions have also been reported as potential treatments for colic and digestive impactions (Lopes et al. 1999, Blikslager 2005). Endermal and IV fluid treatments may provide an alternative to mineral oil for other livestock as well.
600 601 602 603 604 605 606	The most common alternative to mineral oil is the manual surgical removal of blockages (e.g., fecal matter, undigested food) (Hanson et al. 1996, Athar et al. 2011). Surgery is also the veterinary approach following unsuccessful mineral oil treatment, as colic, impaction, and compaction may be fatal (Lopes et al. 1999, Athar et al. 2011). However, in some surgical alternatives, mineral oil is added to the digestive component after the manual removal of the blockage to remove any remaining material in other digestive cavities (Athar et al. 2011).
607 608 609 610	A large needle may be used as an alternative to mineral oil lubricants in cases of ruminal bloat (Costello 2005). Like with other surgical treatments, needle puncture to alleviate gas build-up is also used when the mineral oil treatments are unsuccessful, as severe ruminal bloat may be fatal (Costello 2005).
611	Report Authorship
612 613 614 615	The following individuals were involved in research, data collection, writing, editing, and/or final approval of this report:
616 617	 Philip Shivokevich, Visiting Assistant Professor of Chemistry, University of Massachusetts Amherst
618 619 620	 Samantha Olsen, Technical Editor, Savan Group Catherine Canary, Technical Editor, Savan Group
621 622 623	All individuals are in compliance with Federal Acquisition Regulations (FAR) Subpart 3.11—Preventing Personal Conflicts of Interest for Contractor Employees Performing Acquisition Functions.
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