# SOT FDA Colloquia on Emerging Toxicological Science Challenges in Food and Ingredient Safety



Alternative Toxicological Approaches for Process-Formed Constituents in Food

January 17, 18, or 19, 2023



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### **Next Generation Systemic Toolbox**

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### **Conflict of Interest Statement**

- The research described in this session was supported by an entity that manufactures and/or distributes a material that is the subject of this session.
- Mention of specific products does not constitute an endorsement of those products





- To introduce one approach to non-animal safety decision making
- To explain the International Cooperation on Cosmetics Regulation Principles of Next Generation Risk Assessment
- To describe some of the tools that can be used and how a decision can be reached



#### What is Next Generation Risk Assessment?

A Strategic Roadmap for Establishing New Approaches to Evaluate the Safety New Approaches and Medical Products

An exposure-led, hypothesis driven risk assessment approach that incorporates one or more NAMs to ensure that chemical exposures do not cause harm to consumers

Dent et al., (2018) Comp Tox 7:20-26



# **Principles of NGRA**

#### • Main overriding principles:

- The overall goal is a human safety risk assessment
- The assessment is exposure led
- The assessment is hypothesis driven
- The assessment is designed to prevent harm

#### • Principles describe how a NGRA should be conducted:

- Following an appropriate appraisal of existing information
- Using a tiered and iterative approach
- Using robust and relevant methods and strategies

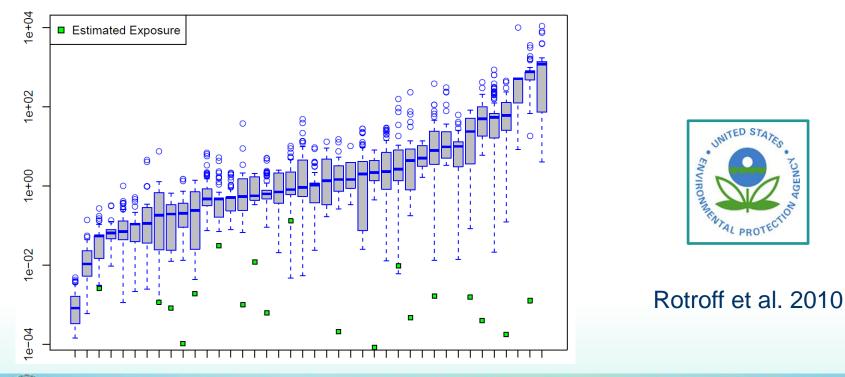
#### • Principles describe how a NGRA should be documented:

- Sources of uncertainty characterized and documented
- The logic of the approach transparent and documented

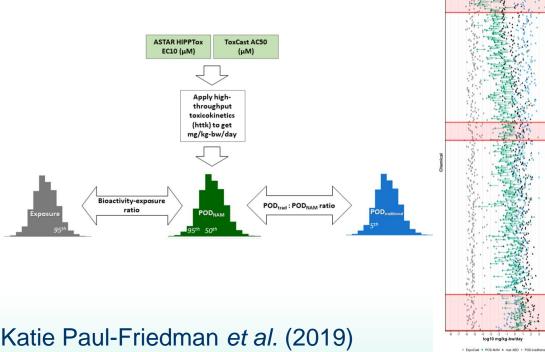


### **"Protection not Prediction"**

**Distributions of Oral Equivalent Values and Predicted Chronic Exposures** 



### EPA, NTP, HC, A\*STAR, ECHA, EFSA, JRC, RVIM...

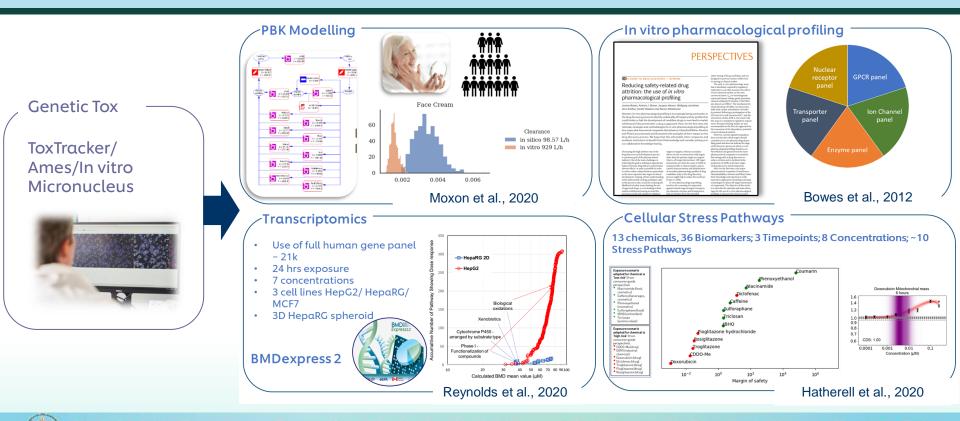


414/448 chemicals = 92% of the time this naïve approach appears conservative

#### Katie Paul-Friedman et al. (2019)



## The core NAMs in our systemic NGRA toolbox



### **Example NGRA: Hexylresorcinol**

- HR uses include as an approved food additive in the EU
  - Prevention of melanosis in shrimp
  - Scientific Opinion on the re-evaluation of 4-hexylresorcinol (E 586) as a food additive (wiley.com)
- How would you use the NGRA toolbox instead of the animal data to assess this use?



## **Tiered Approach to Exposure Estimation**

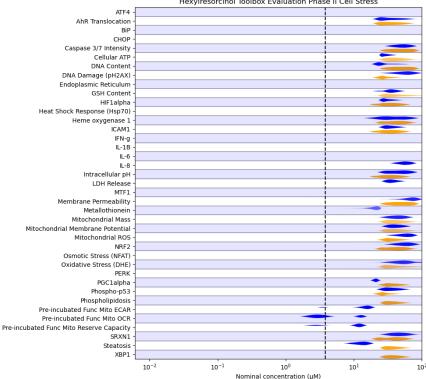
- Level 0: Characterize Exposure Scenario
  - Maximum Permitted Level in EU is 2 mg /kg shrimp
  - 95<sup>th</sup> %ile intake (consumers only) 3.3 µg/kg/day (Adults, 18-64 y)
- Level 1: PBK model built with *in silico* parameters only
  - Predicted plasma  $C_{max} = 0.007 \ \mu M$
- Level 2: PBK model built with in vitro parameters
  - Predicted plasma  $C_{max} = 0.006 \ \mu M$
- Level 3: PBK model improved with in vivo data
  - N/A: none available for HR

Moxon et al., 2020



# **Bioactivity Data (1/3)**

#### Cell Stress Global Point of Departure = $3.8 \mu M$



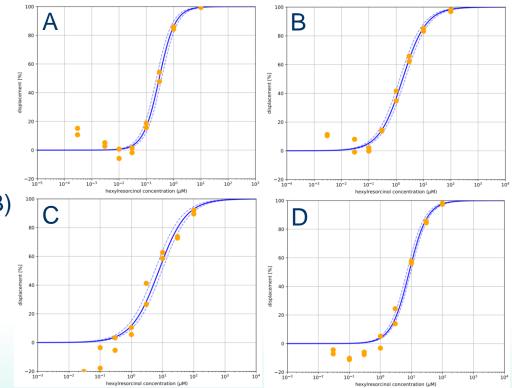
Hexylresorcinol Toolbox Evaluation Phase II Cell Stress

#### Middleton et al. (2022)

TOA.

# **Bioactivity Data (2/3)**

- IPP dose response for
  - A: PTGS1 (COX-1), 95% C.I.(IC50) =  $[0.2\mu M, 0.4\mu M]$
  - B: PTGS2 (COX-2), 95%
    C.I.(IC50) = [1.4µM, 2.1µM]
  - C: HTR2B (serotonin receptor 2B)
    95% C.I.(IC50) = [5.7µM, 9.6µM]
  - D: SLC6A2 (norepinephrine transporter), 95% C.I.(IC50) = [7.3µM, 9.5µM]





## **Bioactivity Data 3/3**

• High throughput transcriptomics data analysed using 2 methods:

- BIFROST (Bayesian inference for region of signal threshold): Minimum effect concentration across all genes.
- Benchmark Dose Lower Confidence Interval (BMDL<sub>10</sub>)

Cell Line	Global PoD (µM)	Minimum Pathway BMDL (µM)
HepaRG	8.1	53
HepG2	7.3	27
MCF7	0.8	15

Middleton et al. (2022)

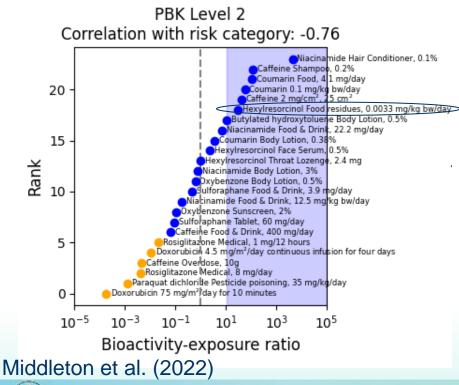


### **Bioactivity: Exposure Ratio**

- Ratio of lowest PoD and Exposure
- 2.5<sup>th</sup>, 50<sup>th</sup>, 97.5<sup>th</sup> percentile BERs: 2.5 51 1100 Hexylresorcinol, Oral, Food residues, 0.0033 mg/kg bw/day - $10^{-5}$   $10^{-4}$   $10^{-3}$   $10^{-2}$  $10^{-1}$ 10<sup>0</sup> 10<sup>1</sup> 10<sup>2</sup> 10<sup>3</sup> 104 10<sup>5</sup> Bioactivity exposure ratio

#### Middleton et al. (2022)

# **Toolbox evaluation (pilot phase)**



Are NAM-based assessments protective? What BER is needed to assure safety?

Yellow: High Risk Exposure Scenarios Blue: Low Risk Exposure Scenarios



#### **Next Steps**



Further iterations to ensure the toolbox is protective and useful

Identify additional or redundant NAMs





- The ICCR Principles provide a guide to help apply NAM-based approaches to cosmetics risk assessment, but are also applicable to foods
- A 'Protection not Prediction' approach provides a conservative safety decision, assuming relevant bioactivities are covered
- The NGRA toolbox needs to be broadly applicable to different chemistries, including food contaminants



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