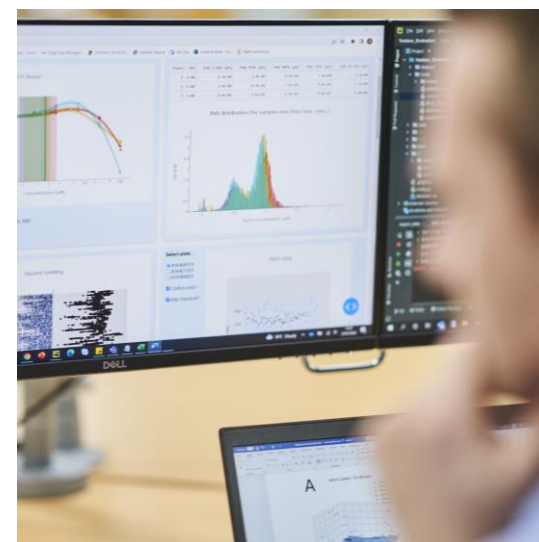
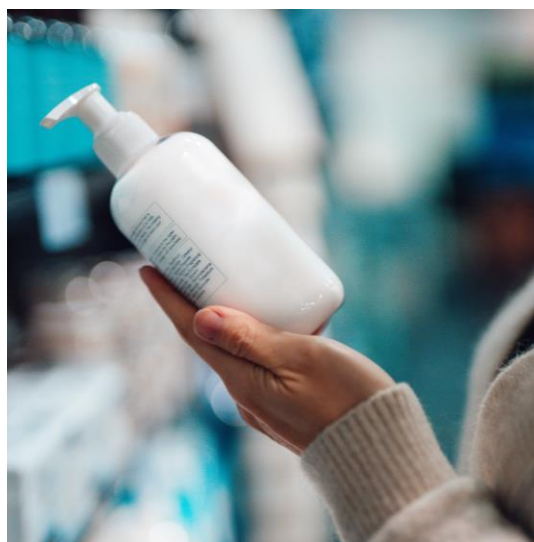


# Non-animal methods for systemic toxicity

Matt Dent, Unilever Safety and Environmental Assurance Centre, UK



## What is next generation risk assessment (NGRA)?

*“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

# Is NGRA even possible for systemic toxicity?

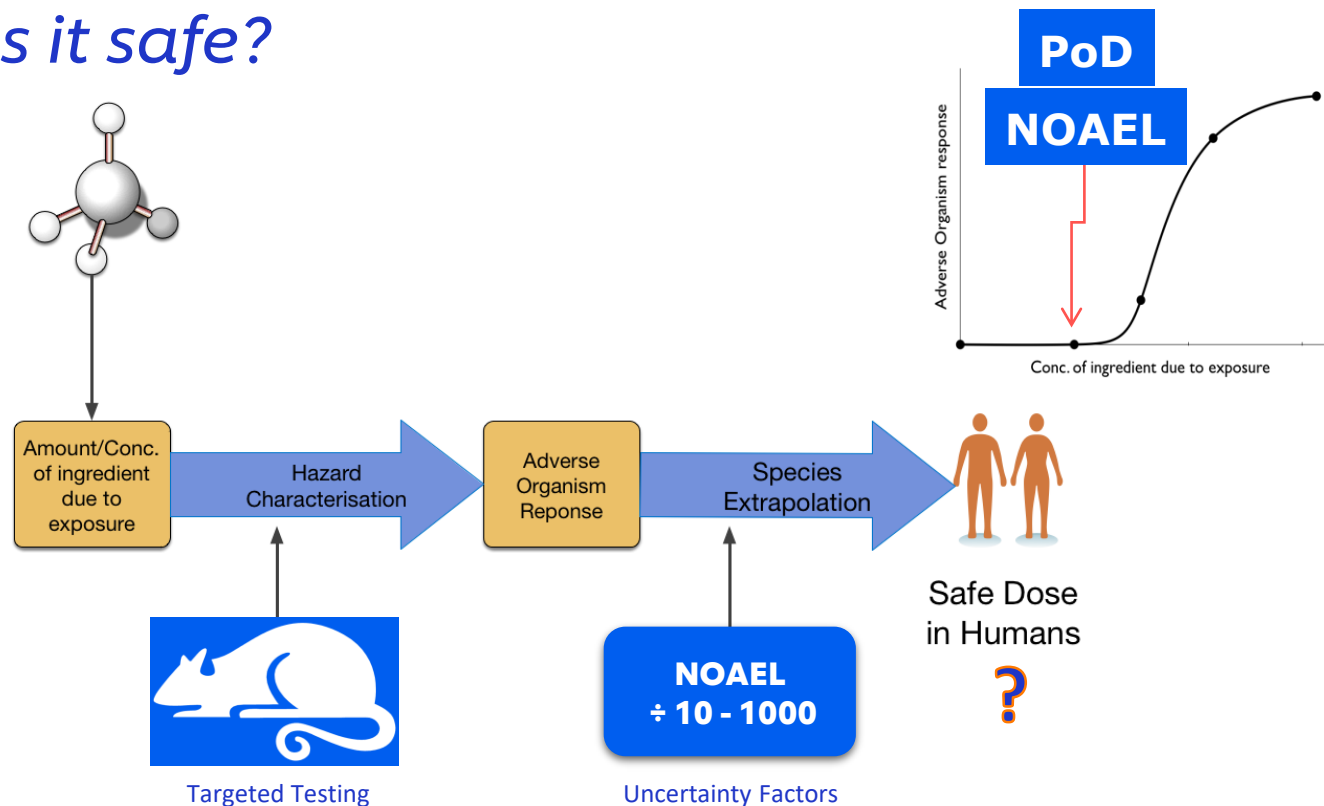
Systemic toxicity isn't like local toxicity

Many possible adversities

ADME considerations


Homeostasis

*Is it safe?*



# Tiered, exposure-led NGRA means we can make robust safety decisions today

- Many tools available ([exposure-based waiving](#), read across, [history of safe use](#))
- Increasing recognition that *in vitro* bioactivity is a part of this tiered approach (e.g. [Health Canada](#), [SCCS](#))
- Our knowledge will never be complete, but we know enough to start, and to ensure animal testing is only ever used as a last resort

<p style="text-align: center;"><b>Science Approach Document</b></p> <p style="text-align: center;"><b>Bioactivity Exposure Ratio: Application in Priority Setting and Risk Assessment</b></p> <p style="text-align: center;"><b>Health Canada</b></p> <p style="text-align: center;"><b>March 2021</b></p>	<p style="text-align: center;"><b>Use: NAM Insurance</b></p> <p><i>able<sup>1</sup>, Stella Cochran Carl Westmoreland ook, Bedfordshire, UK; <sup>2</sup></i></p> <p>the experimental animal gh regulatory adoption ertify systemic safety e essments (NGRA).</p> <p>and associate form toxicity ucts founded on <i>in</i> tribe changes in co</p>	<p style="text-align: right;">SCCS/1647/22</p> <div style="text-align: center;">  <p><b>Scientific Committee on Consumer Safety</b> <b>SCCS</b></p> <p><b>THE SCCS NOTES OF GUIDANCE FOR THE TESTING OF COSMETIC INGREDIENTS AND THEIR SAFETY EVALUATION</b> <b>12<sup>TH</sup> REVISION</b></p> </div>
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# Principles of NGRA from ICCR

## 4

### **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**

## 3

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

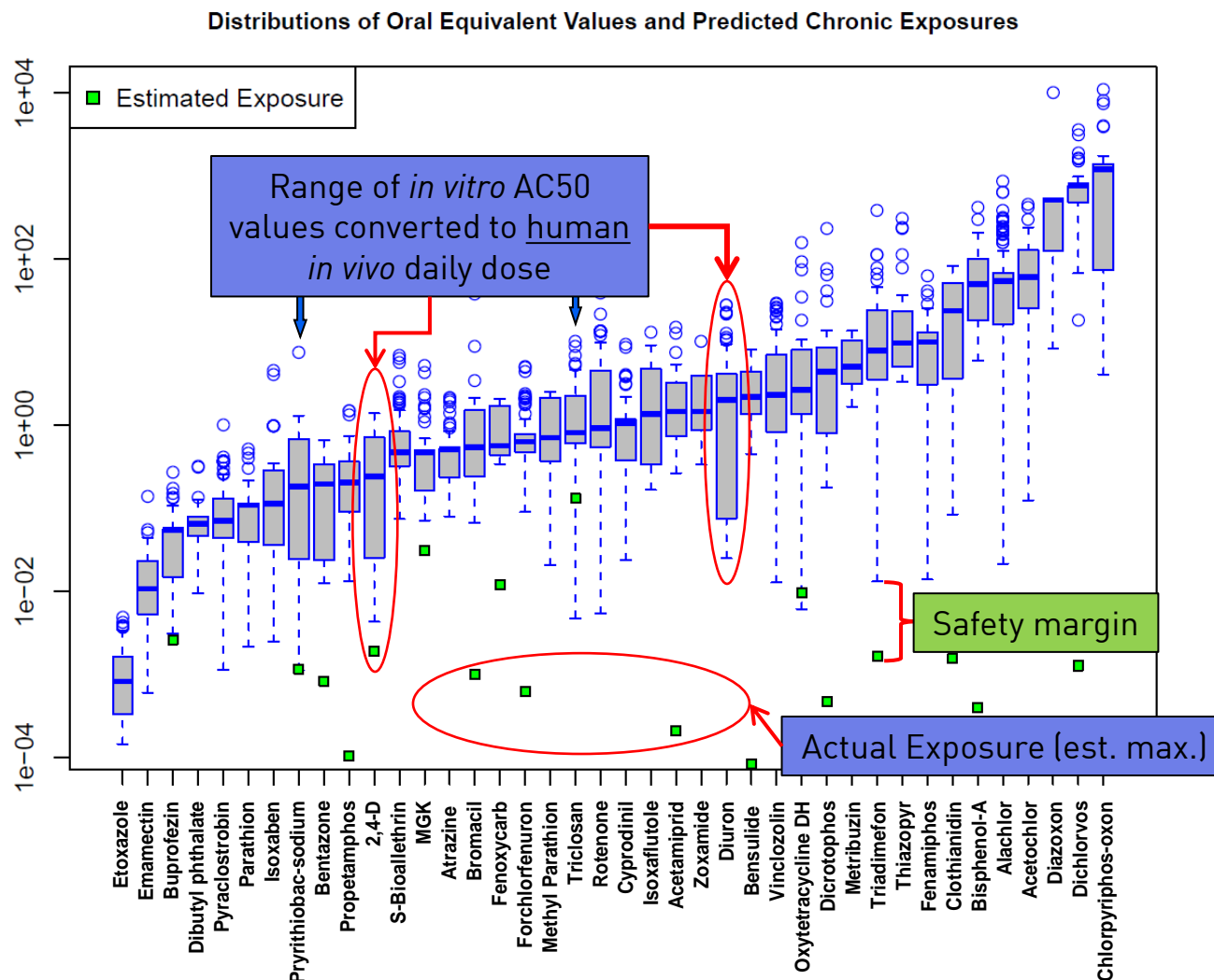
- **Following an appropriate appraisal of existing information**
- **Using a tiered and iterative approach**
- **Using robust and relevant methods and strategies**

## 2

### **Principles for documenting NGRA:**

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

# Paradigm shift for systemic safety - Protection not Prediction



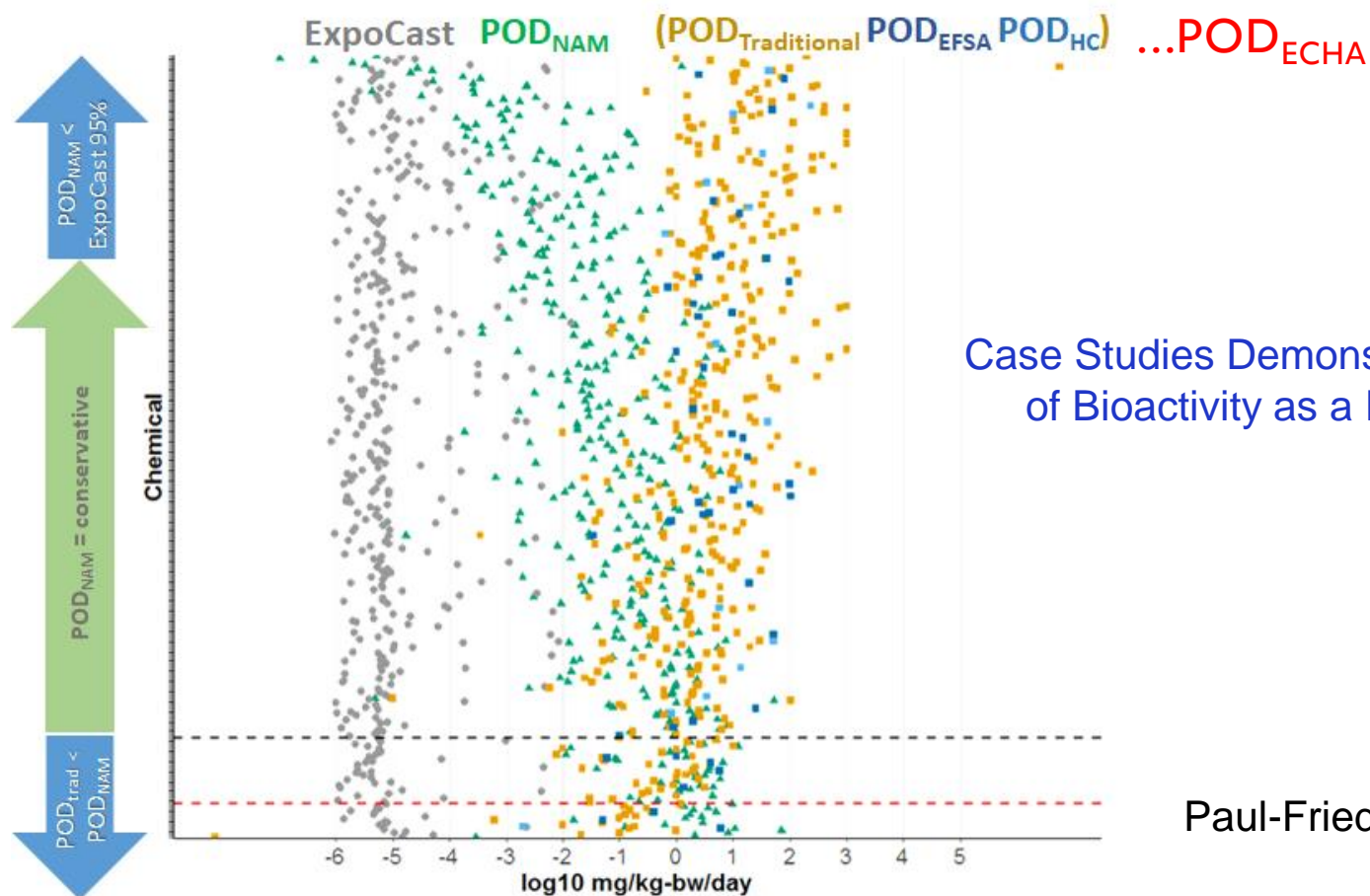
The hypothesis underpinning this type of NGRA is that **if there is no bioactivity observed at consumer-relevant concentrations, there can be no adverse health effects.**

Rotroff, *et al.* *Tox.Sci* 2010



Graphic from Dr Rusty Thomas, EPA, with thanks

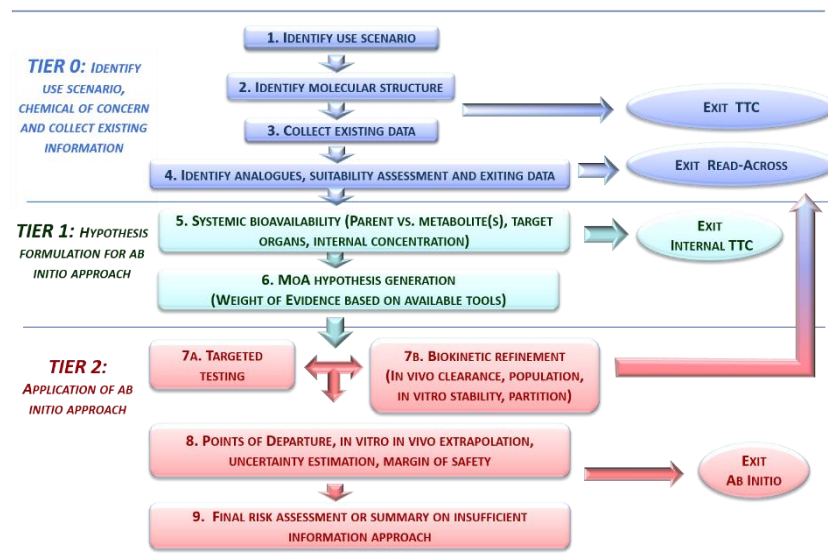
# Points of Departure from NAMs can be protective



Case Studies Demonstrating Application of Bioactivity as a Protective POD

Paul-Friedman et al., 2020

# Guiding principles for the *ab initio* NGRA applied to the Benzophenone-4 case study



Computational Toxicology 7 (2018) 20–26



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Computational Toxicology

journal homepage: [www.elsevier.com/locate/comtox](http://www.elsevier.com/locate/comtox)



Principles underpinning the use of new methodologies in the risk assessment of cosmetic ingredients

Matthew Dent<sup>a,\*</sup>, Renata Teixeira Amaral<sup>b</sup>, Pedro Amores Da Silva<sup>b</sup>, Jay Ansell<sup>c</sup>, Fanny Boisleve<sup>d</sup>, Masato Hatao<sup>e</sup>, Akihiko Hirose<sup>f</sup>, Yutaka Kasai<sup>g</sup>, Petra Kern<sup>h</sup>, Reinhard Kreiling<sup>i</sup>, Stanley Milstein<sup>j</sup>, Beta Montemayor<sup>k</sup>, Julcemara Oliveira<sup>l</sup>, Andrea Richarz<sup>m</sup>, Rob Taalman<sup>n</sup>, Eric Vaillancourt<sup>o</sup>, Rajeshwar Verma<sup>i</sup>, Nashira Vieira O'Reilly Cabral Posada<sup>l</sup>, Craig Weiss<sup>p</sup>, Hajime Kojima<sup>f</sup>



SOT | Society of Toxicology  
academic.oup.com/toxsci

TOXICOLOGICAL SCIENCES, 176(1), 2020, 236–252

doi: 10.1093/toxsci/taaa048  
Advance Access Publication Date: April 10, 2020  
Research article

## A Next-Generation Risk Assessment Case Study for Coumarin in Cosmetic Products

Maria T. Baltazar,<sup>1</sup> Sophie Cable, Paul L. Carmichael, Richard Cubberley, Tom Cull, Mona Delagrang, Matthew P. Dent, Sarah Hatherell, Jade Houghton, Predrag Kukic, Hequn Li, Mi-Young Lee, Sophie Malcomber, Alistair M. Middleton, Thomas E. Moxon, Alexis V. Nathanail, Beate Nicol, Ruth Pendlington, Georgia Reynolds, Joe Reynolds, Andrew White, and Carl Westmoreland



Organisation for Economic Co-operation and Development

ENV/CBC/MONO(2021)35

Unclassified

English - Or. English

27 October 2021

ENVIRONMENT DIRECTORATE  
CHEMICALS AND BIOTECHNOLOGY COMMITTEE

Case Study on use of an Integrated Approach for Testing and Assessment (IATA) for Systemic Toxicity of Phenoxyethanol when included at 1% in a body lotion



# Benzophenone-4 (BP-4) case study



EN English

Search

## Newsroom

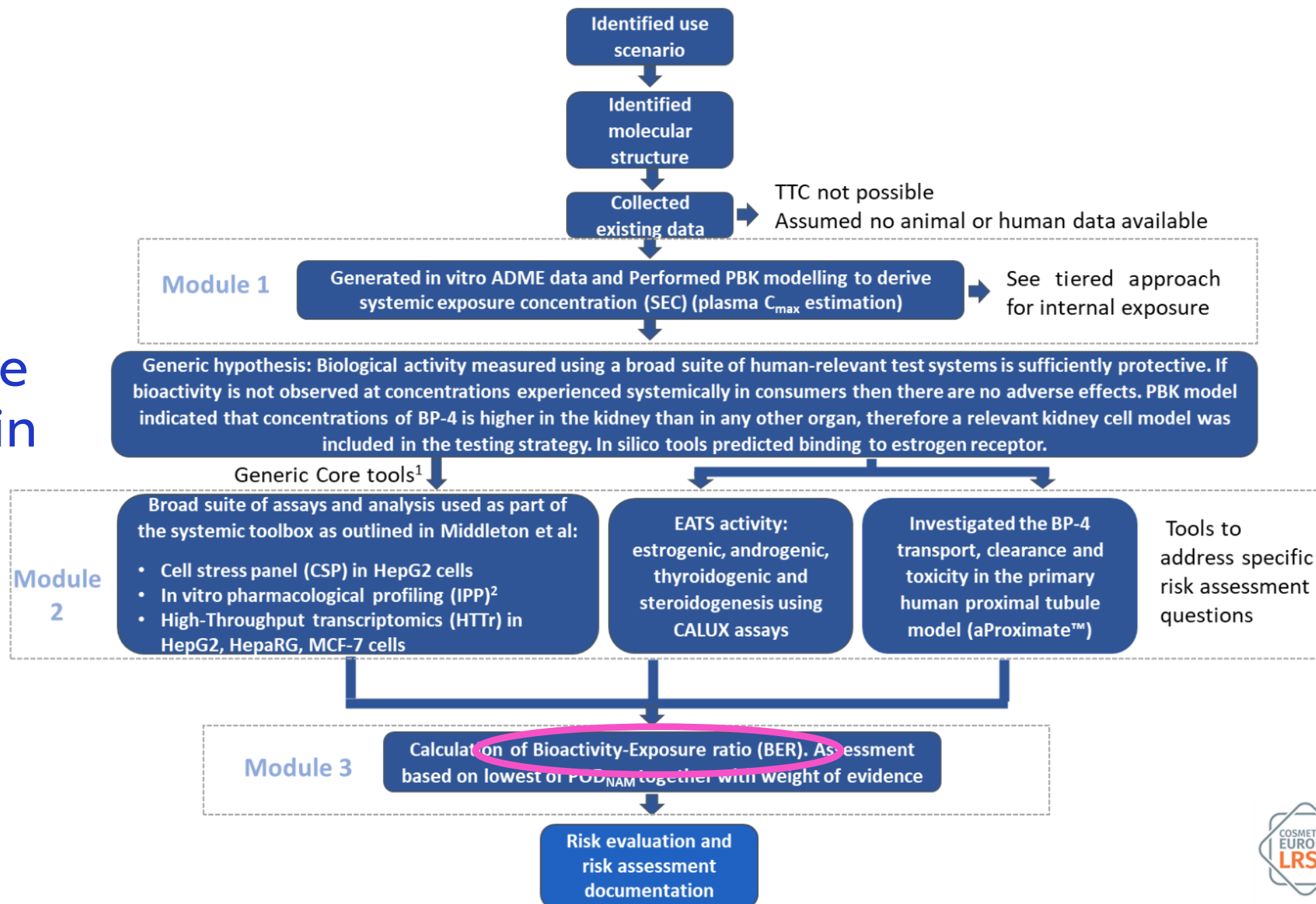
Growth | Topics ▾ | Archives

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**Call for data on ingredients with potential endocrine-disrupting properties used in cosmetic products**

Is a tiered NGRA approach is sufficiently protective and useful to answer a real-life question?

# Approach based on previous case studies and in accordance with ICCR Principles



# Tiered approach for Exposure estimation

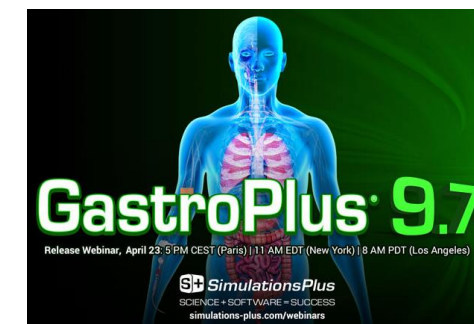
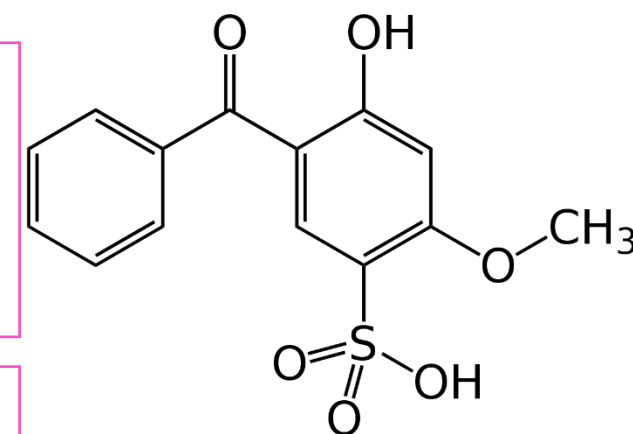
## Level 0: Characterise exposure scenario

- 5% in Sunscreen product,
- 18g/day, two times, 9g/application,
- On body and face 17500cm<sup>2</sup> (total body area)

## Level 1: PBK model built with in silico parameters only & sensitivity analysis

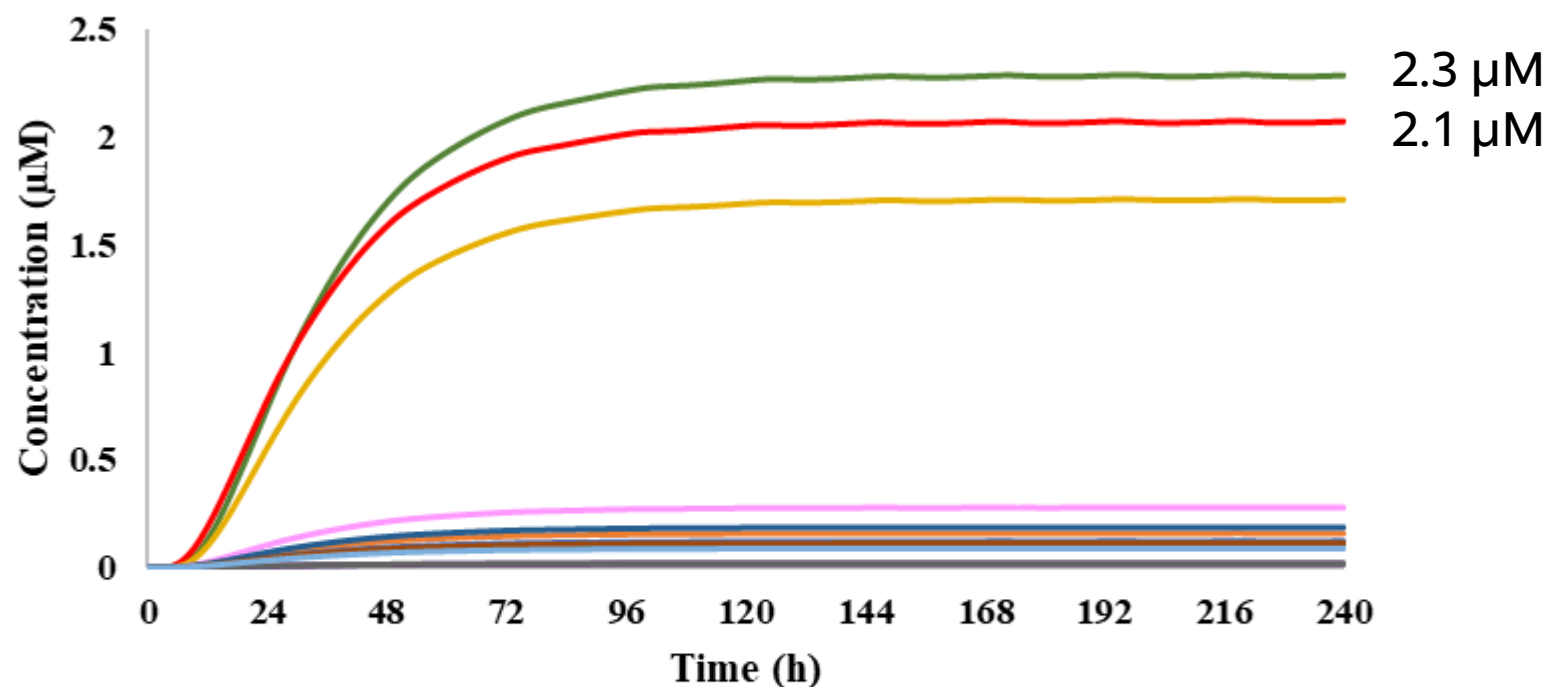
- Predicted sensitive parameters
- Fup (Fraction unbound in plasma)
- Liver CL<sub>int</sub> (intrinsic clearance)
- Dermis water partition coefficient
- Dermis diffusivity

## Level 2: PBK model built with vitro parameters



# PBK model simulation of $C_{max}$

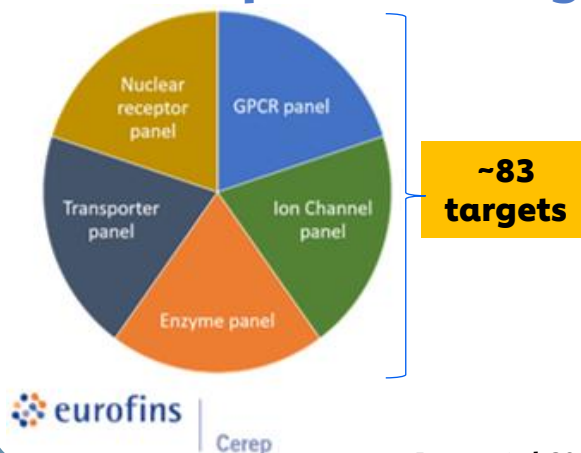
## BP4-Systemic Exposure-repeat



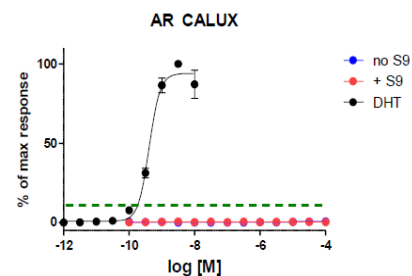
BP-4 concentrations in plasma and different tissues after repeated exposure of body lotion 18g/day, i.e., 9g twice per day for a period of 10 days, with 5% BP-4, on the whole body.

# Key bioactivity NAMs

## In vitro pharmacological profiling



CALUX bioassays and binding assays: TTR-TR $\beta$ - and hTPO

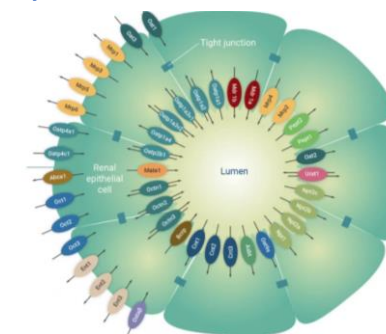


Bowes et al. 2012. *Nat Rev Drug Discov* 11(12): 909-22  
Sonneveld et al. 2005. *Toxicol Sci* 83(1): 136-48

## Renal Toxicity

Nephrotoxicity (3 donors, duplicate per donor), 8 concentrations, 24h and 72h timepoints:

- KIM-1
- NGAL
- Clusterin
- TEER (Day 0 and Day 3)
- ATP
- LDH

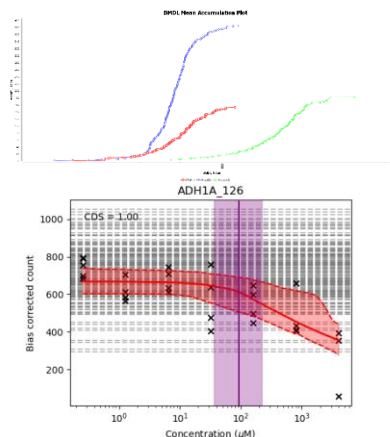


Newcells aProximate™ platform

Piyush Bajaj et al. 2020. *Toxicology*. 442, 152535

## High-Throughput transcriptomics

- TempO-seek technology – full gene panel
- 24hr exposure
- 7 concentrations
- 4 cell models: HepG2, MCF7, HepaRG and aProximate cells
- Dose-response analysis using BMDExpress2 and BIFROST model



Reynolds et al. 2020. *Comp Tox* 16: 100138  
Baltazar et al. 2020. *Toxicol Sci* 176(1): 236-252

## Cell stress panel (CSP)

- 36 biomarkers covering 10 cell stress pathways
- HepG2
- 24hr exposure
- 8 concentrations
- Dose-response analysis using BIFROST model

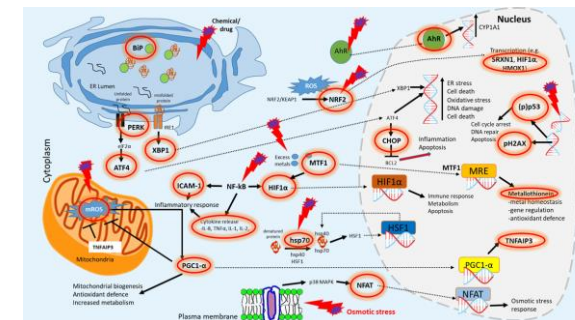
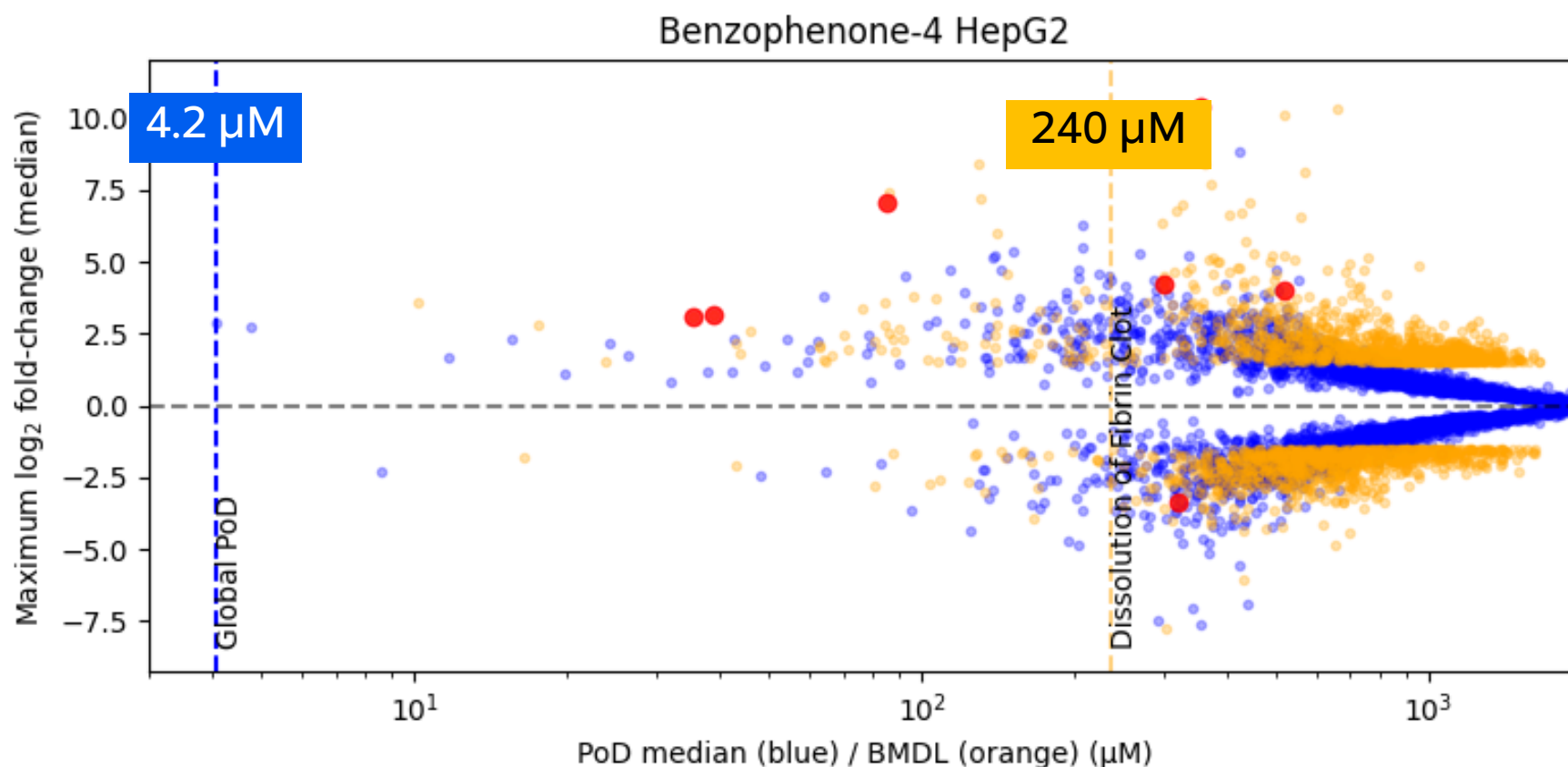


Image kindly provided by Paul Walker (Cyprotex)

Hatherell et al. 2020. *Toxicol Sci* 176(1): 11-33

# Results from the key NAMs- Deriving Points of Departure (PoDs)

Very little bioactivity: high throughput transcriptomics in HepG2 cells gave the lowest point of departure



Bioactivity:Exposure Ratios

$$\text{Gene level} = \frac{4.2}{2.3} = 2$$

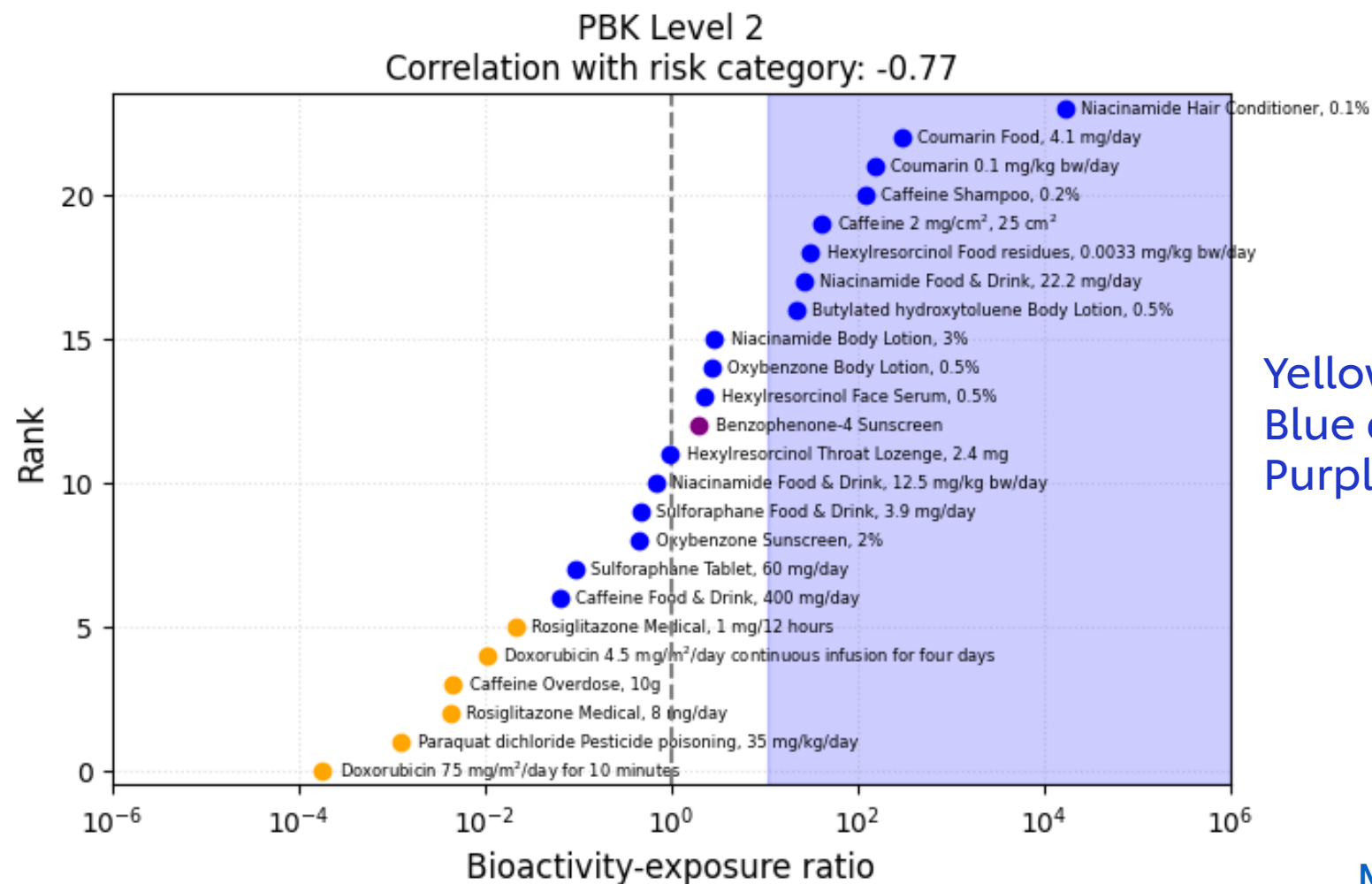
$$\text{Pathway} = \frac{240}{2.3} = 114$$

# Acceptable BER?

**Conceptually, with the following assumptions a  $BER > 1$  indicates a low risk of adverse effects in consumers following use of the product:**

- a) The in vitro measures of bioactivity provide appropriate biological coverage**
- b) There is confidence that the test systems are at least as sensitive to perturbation as human cells in vivo**
- c) The exposure estimate is conservative for the exposed population**

# Benchmarking to determine a low-risk BER



Yellow dots: high risk benchmarks  
Blue dots: low risk benchmarks  
Purple dot: case study



# Conclusion

- Use of tiered, exposure-led approaches allows safety decisions to be made for systemic effects without animal test data
- The ICCR Principles help to formulate the problem and direct the assessment.
- 'Early tier' in vitro screening tools show promise for use in a protective rather than predictive capacity.

# Acknowledgements

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**BioClavis**

**Cyprotex**

**SOLVO**

**BioDetection Systems**

**NewCells**

# Thank You



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