Assessing the safety of consumer products by integrating new approach methodologies (NAMs) within the next generation risk assessment (NGRA)

Dr Renato Ivan de Ávila

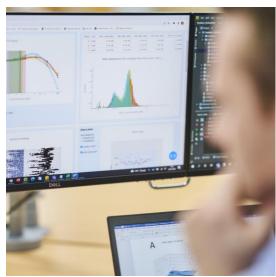
Scientist – Human Safety Unilever Safety and Environmental Assurance Centre (SEAC)













Agenda

- 1. Introduction to Unilever Safety and Environmental Assurance Centre (SEAC)
- 2. Assessing ingredient & product safety without animal testing
- 3. Next-Generation Risk Assessment (NGRA)
- 4. Bioactivity exposure ratio (BER) approach
- 5. NGRA: from principles to application
- 6. Unilever NGRA frameworks for decision-making on human safety
- 7. Concluding remarks



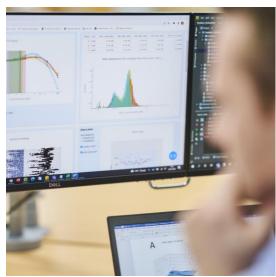


Introduction to SEAC









Unilever's Global Centre of Excellence in Safety & Sustainability Sciences



Unilever's Safety & Environmental Assurance Centre (SEAC)

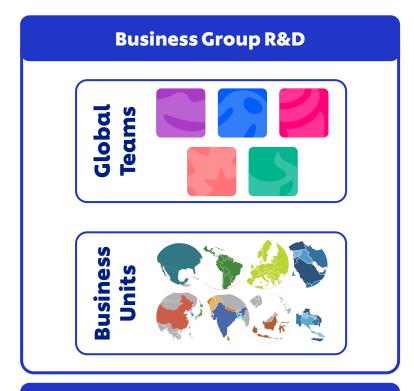


SEAC is Unilever's global centre of excellence in Safety & Sustainability Sciences, part of R&D's Safety, Environment & Regulatory Sciences Capability.

Diverse, multi-disciplinary team of ~150 scientists based at Colworth, UK; ~70 miles north of London

Highly column with or industry, particularly

Highly collaborative, working with over 70 academic, industry, government & NGO partners worldwide







Team SEAC's purpose is to protect people & the environment



SEAC is a diverse, multi-disciplinary team of ~150 scientists covering:

- Cell Biology
- Chemistry
- Computational Modelling
- Environmental Safety
- Environmental Sustainability
- Exposure Science
- Informatics & Data Science
- Mathematics
- Microbiology
- Molecular Biology
- Process Safety
- Statistics
- Toxicology

20+ Nationalities 15+ Languages

- Deploy expertise on higher risk business projects
- Collaborate with leading external research teams to develop & apply new capability
- Leverage science & global networks for consumer trust & freedom to operate

Safety Risk Assessments

- Consumers, Workers, Environment

Life Cycle Assessments

- Environmental Impacts





Team SEAC's purpose is to protect people & the environment by ensuring:



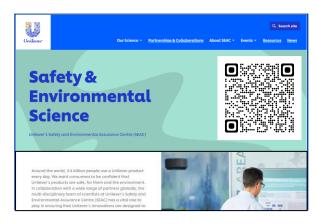


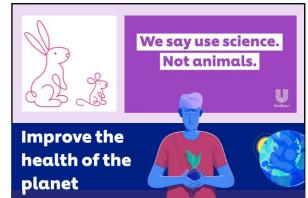
Safety & Env. Sustainability policies & regulations are based on modern science





Much of our strength lies in our shared Values – to be an inclusive, supportive & collaborative Team that is pioneering, transparent & high-performing with a strong focus on learning & wellbeing.







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Can we use a new ingredient safely?

Can we safely use x% of ingredient y in product z?







Risk = Hazard x Exposure



2007 ----





"Advances in toxicogenomics, bioinformatics, systems biology, and computational toxicology could transform toxicity testing from a system based on whole-animal testing to one founded primarily on *in vitro* methods that evaluate changes in biologic processes using cells, cell lines, or cellular components, preferably of human origin."

2008

Brazil Moves Toward the Replacement of Animal Experimentation

Alternatives to Laboratory Animal 2019, Vol. 47(2) 71–81 © The Author(s) 2019 Article reuse guidelines: sagepub.com/journals-permissions DOI: 10.1177/0261192919856806 \$SAGE

Renato Ivan de Ávila and Marize Campos Valadares

Brazilian National Network of Alternative Methods (RENAMA) 10th Anniversary: Meeting of the Associated Laboratories, May 2022

de Ávila et al. Altern. Lab. Anim. (ATLA), article in press, 2023.



Brazil paves the way to end animal testing thro...

To find out more about the state of animal testing in Brazil, Cosmetics Design USA spoke with Dr. Gavin Maxwell, safe...

www.cosmeticsdesian.com

https://www.cosmeticsdesign.com/Article/2023/09/12/brazil-paves-the-way-to-endanimal-testing-throughout-latam

Presidência da República Casa Civil

Subchefia para Assuntos Jurídicos

2008: Lαw no. 11,794/2008 (Lei Aroucα) represents a regulatory milestone in the implementation of alternative methods

LEI Nº 11.794, DE 8 DE OUTUBRO DE 2008.

2012:

RENAMA

Regulamenta o inciso VII do § 1º do art. 225 da Constituição Federal, estabelecendo procedimentos para o uso científico de animais: revoga a Lei nº 6.638, de 8 de maio de 1979; e dá outras providências,

creation of the

Ministério da Ciência, Tecnologia e Inovação

GABINETE DO MINISTRO

PORTARIA Nº 491, DE 3 DE JULHO DE 2012

Institui a Rede Nacional de Métodos Alternativos - RENAMA e sua estrutura no âmbito do Ministério da Ciência, Tecnologia e Inovação - MCTI, que será supervisionada por um Conselho Diretor.

2012: ANVISA publishes the guide for cosmetics safety assessment



Guia para Avaliação de Segurança de Produtos 2º Edicão

Ministério da Ciência, Tecnologia e Inovação

CONSELHO NACIONALDE CONTROLE DE EXPERIMENTAÇÃO ANIMAL

RESOLUÇÃO NORMATIVA Nº 17, DE 3 DE JULHO DE 2014

Dispõe sobre no Brasil e dá

DIÁRIO OFICIAL DA UNIÃO

Publicado em: 17/01/2022 | Edição: 11 | Seção: 1 | Página: 18

Órgão: Ministério da Ciência, Tecnologia e Inovações/Conselho Nacional de Controle de Experimentação Animal

RESOLUÇÃO NORMATIVA CONCEA Nº 54, DE 10 DE JANEIRO DE 2022

Dispõe sobre o reconhecimento de métodos alternativos ao uso de animais em atividades de ensino e pesquisa científica e dá outras providências.

2014: CONCEA

recognized alternative

methods

2015:

ANVISA starts to accept the methods recognized by **CONCEA**



RESOLUÇÃO - RDC Nº 35, DE 7 DE AGOSTO DE 2015

Dispõe sobre a aceitação dos métodos alternativos de experimentação animal reconhecidos pelo Conselho Nacional de Controle de Experimentação Animal - Concea.

A Diretoria Colegiada da Agência Nacional de Vigilância Sanitária, no uso das atribuições que lhe conferem os incisos III e IV. do art. 15, da Lei nº 9.782, de 26 de janeiro de 1999, inciso V e §§

CONCEA recognizes some innovative methods

+40 testing guidelines:

- 30 1R (replacement) quidelines
- 11 2R (refinement & reduction) guidelines

Ministério da Ciência, Tecnologia

GABINETE DO MINISTRO

RESOLUÇÃO NORMATIVA Nº 18, DE 24 DE SETEMBRO DE 201-

hece métodos alternativos ao uso de animais em atividades de pesquisa r ção Normativa nº 17, de 03 de julho de 2014, e dá outras providências.

Ministério da Ciência, Tecnologia, Inovações e Comunicações

CONSELHO NACIONAL DE CONTROLI DE EXPERIMENTAÇÃO ANIMAL

RESOLUÇÃO NORMATIVA Nº 31, DE 18 DE AGOSTO DE 2016

https://www.gov.br/mcti/pt-br/composicao/conselhos/concea/paginas/publicacoeslegislacao-e-quia/metodos-alternativos-reconhecidos-pelo-concea

DIÁRIO OFICIAL DA UNIÃO - Seção

CONSELHO NACIONAL DE CONTROLE DE EXPERIMENTAÇÃO ANIMAL

RESOLUÇÃO Nº 45, DE 22 DE OUTUBRO DE 2019

Reconhece método alternativo ac em atividades de pesquisa no Bra





perfumes que utilizem em suas formulações ingredientes ou

compostos com segurança e eficácia já comprovada cientificamente e dá outras providências

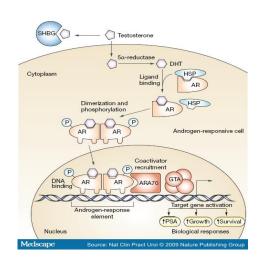


What is Next-Generation Risk Assessment (NGRA)?

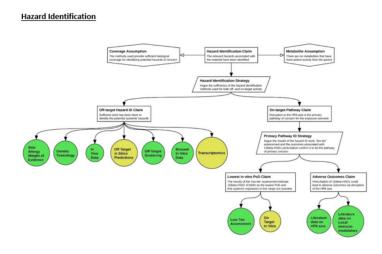
- Using different data inputs from , e.g. new approach methodologies (NAMs), which characterise the chemical-biological interactions & effects at the molecular & cellular level
- An exposure-led risk assessment solution to biological pathway-indicated hazard concerns



Exposure led



Mechanistic



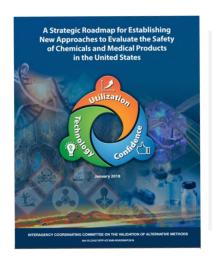
Hypothesis driven



UNITED STATES

Maximising use of existing information

- All available safety data (of suitable quality)
 - public domain, historical in house data, supplier data etc
 - chemistry data, in vitro data, clinical data, epidemiological data, animal toxicology data etc
- Exposure-based waiving approaches
- History of safe use (HoSU)
- Read-across
- Use of existing in vitro data and approaches



"More recently, the term "new approach methodologies" (NAMs) has been adopted as a broadly descriptive reference to any non-animal technology, methodology, approach, or combination thereof that can be used to provide information on chemical hazard and risk assessment."

Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), 2018

Available at: https://ntp.niehs.nih.gov/go/iccvam-rdmp



Principles of Next Generation Risk assessment (NGRA)

NGRA is defined as **an exposure-led**, **hypothesis-driven** risk assessment approach that **integrates New Approach Methodologies (NAMs)** to assure **safety without the use of animal testing**

Dent et al. Principles underpinning the use of new methodologies in the risk assessment of cosmetic ingredients. Computational Toxicology, v. 7, p. 20-26, 2018.



https://www.iccr-cosmetics.org/

Main overriding principles:

- 1. The overall goal is a human safety risk assessment
- 2. The assessment is exposure led
- 3. The assessment is hypothesis driven
- 4. The assessment is designed to prevent harm

Principles describe how a NGRA should be conducted:

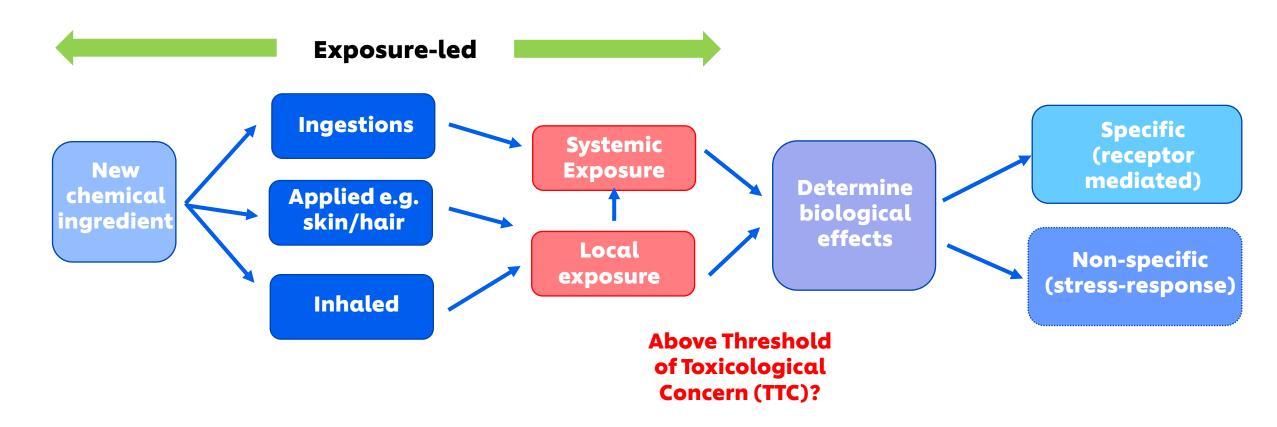
- 5. Following an appropriate appraisal of existing information
- 6. Using a tiered and iterative approach
- 7. Using robust and relevant methods and strategies

Principles for documenting NGRA:

- 8. Sources of uncertainty should be characterized and documented
- 9. The logic of the approach should be transparently and documented



NGRA is an Exposure-led approach



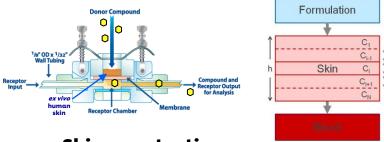


NGRA: The assessment is exposure-led

- Route of exposure
- Consumer use (Habits & Practices)
- Applied dose (external concentration)



ADME parameters

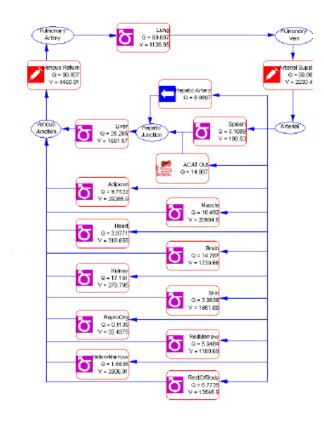


- Skin penetration
- Phys-chem properties
- Hepatic clearance
- Fraction unbound
- · blood:plasma ratio

Uncertainty analysis-Population simulation



Physiologically-based kinetic (PBK) modelling - Internal concentration (plasma, urine, organlevel)





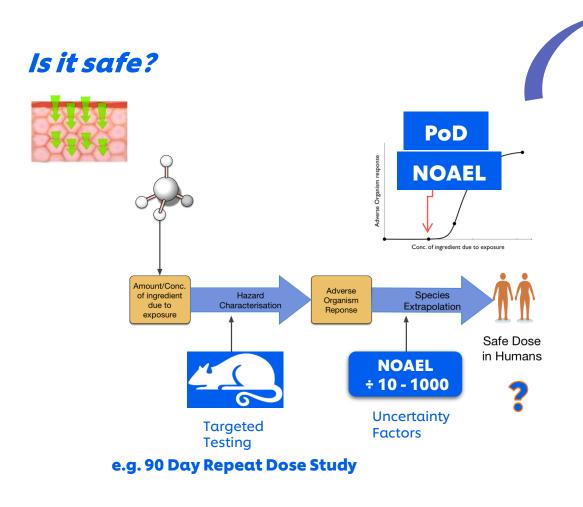
Risk Assessment Process

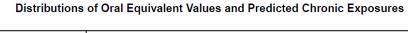
Animal-free Historical Physical and chemical Physical and characterization Hazard X Exposure = Risk chemical All existing characterization information All existing Risk Conclusion based information considerations on TTC Empirical hazard Risk Conclusion based NOAEL or LOAEL In silico tools data from list of on Read Across Read Across animal tests → in vivo PoD Biological activity BMD → PoD characterisation In vitro Use/exposure Internal considerations Margin of Exposure concentrations **Risk Assessment** PoD - Point of Departure NOAEL - No Observed Adverse Effect Level Conclusion LOAEL - Lowest Observed Adverse Effect Level

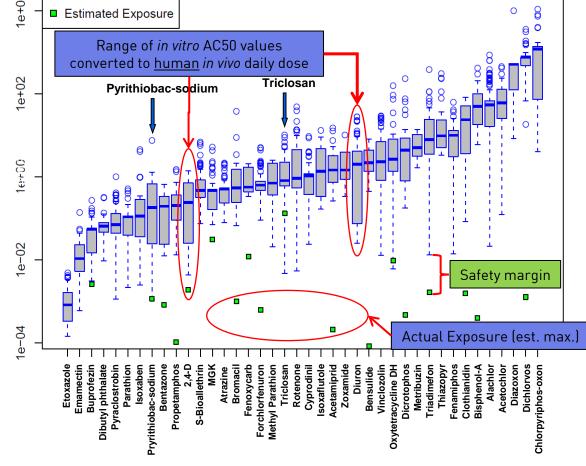
BMD - benchmark dose

TTC - Threshold of Toxicological Concern

NGRA: the bioactivity exposure ratio (BER) approach and decision making









PoD – Point of Departure

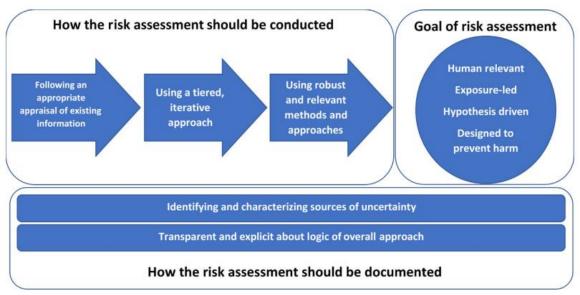
NOAEL – No Observed Adverse Effect Level

Vision of NGRA

Protection-not-prediction Concept

If there is no bioactivity observed at consumer-relevant concentrations, there can be no adverse health effects.

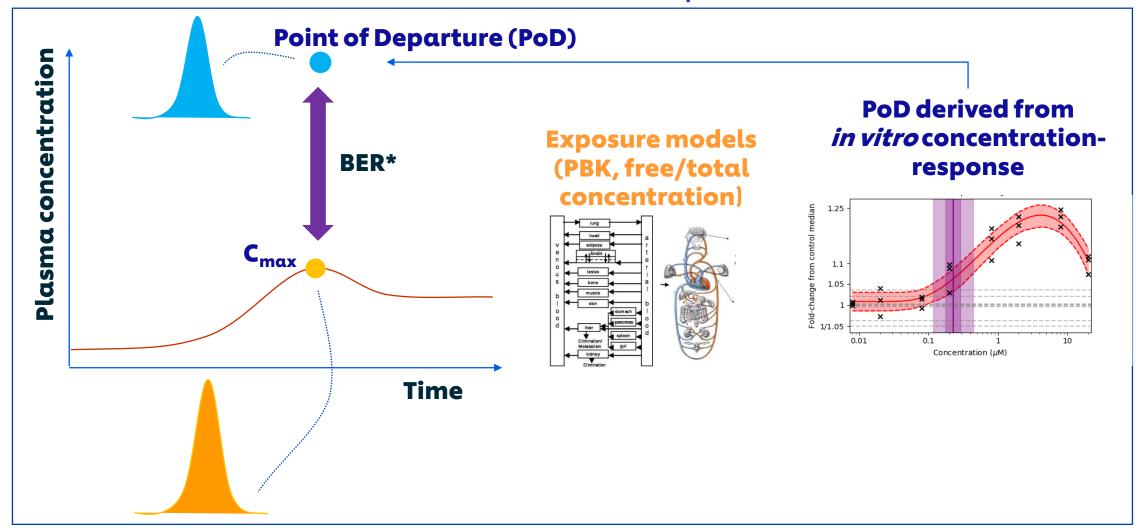
If there is bioactivity observed at consumer-relevant concentrations, we need to work out if that could result in an adverse effect.





Bioactivity Exposure Ratio (BER)

The ratio of the PoD and the relevant exposure estimate





Bioactivity Exposure Ratio (BER) approach:

interpreting in vitro NAMs data for assessing chemical safety



https://www.epa.gov/chemical-research/accelerating-pace-chemical-risk-assessment-apcro

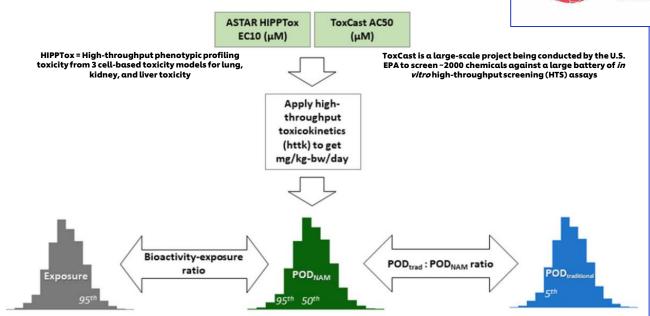




TOXICOLOGICAL SCIENCES, 173(1), 2020, 202–225
doi: 10.1093/toxsci/kfz201
Advance Access Publication Date: September 18, 2019
Research Article

Utility of In Vitro Bioactivity as a Lower Bound Estimate of In Vivo Adverse Effect Levels and in Risk-Based Prioritization

Katie Paul Friedman ,** Matthew Gagne, Lit-Hsin Loo, Panagiotis Karamertzanis, Tatiana Netzeva, Tomasz Sobanski, Jill A. Franzosa, Ann M. Richard, Ryan R. Lougee, Andrea Gissi, Jia-Ying Joey Lee, Michelle Angrish, Jill Ban Lou Dorne, Stiven Foster, Kathleen Raffaele, Tina Bahadori, Maureen R. Gwinn, Jason Lambert, Maurice Whelan, Mike Rasenberg, Tara Barton-Maclaren, and Russell S. Thomas



- ✓ Evaluation of *in vitro* new approach methodologies (NAMs), exposure modelling and dose-response models
- √ For 89% chemicals (n=448), PoD_{NAM} was more conservative than PoD_{traditional}
- ✓ BER approach is useful to accelerate screening and chemicals assessment using NAMs for hazard and exposure



NGRA: Using relevant methods to test hypotheses

Established Methods

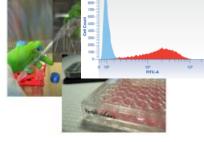
OECD test methods





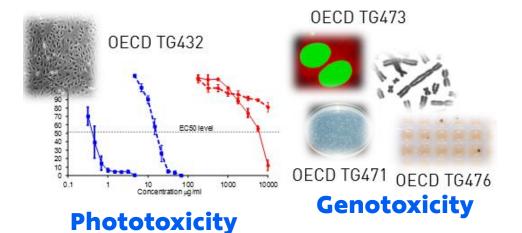
Skin and eye irritation

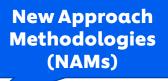
OECD TG442C OECD TG442E



OECD TG442D

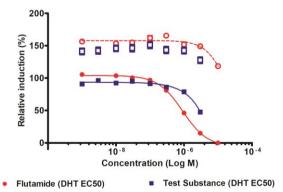
Skin sensitisation





Receptor-binding assays

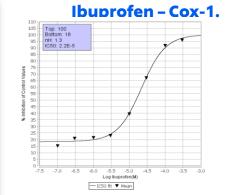
e.g. AR-CALUX® assay to measure androgen receptor activity



- Flutamide (DHT 100xEC50)
- Test Substance (DHT 100xEC50)

Dent et al. Toxicological Science, 167, 375-384, 2019.







Biological activity characterisation using NAMs

Cellular stress

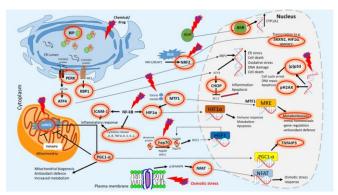
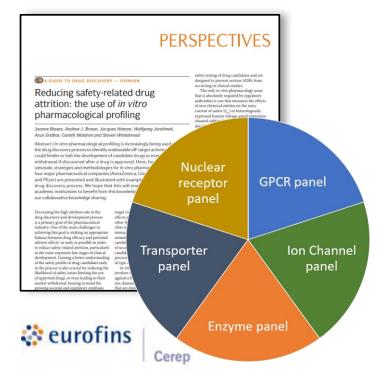


Image kindly provided by Paul Walker (Cyprotex)

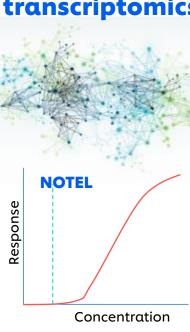
36 biomarkers identified that were representative of key stress pathways, mitochondrial toxicity and cell health.

Hatherell et al. Toxicological Sciences, 176, 11-33, 2020.

Receptor-binding assays





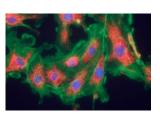


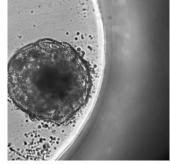
Mechanism based gentox assessment



DNA Damage
P53 Binding
Oxidative Stress
Protein Damage

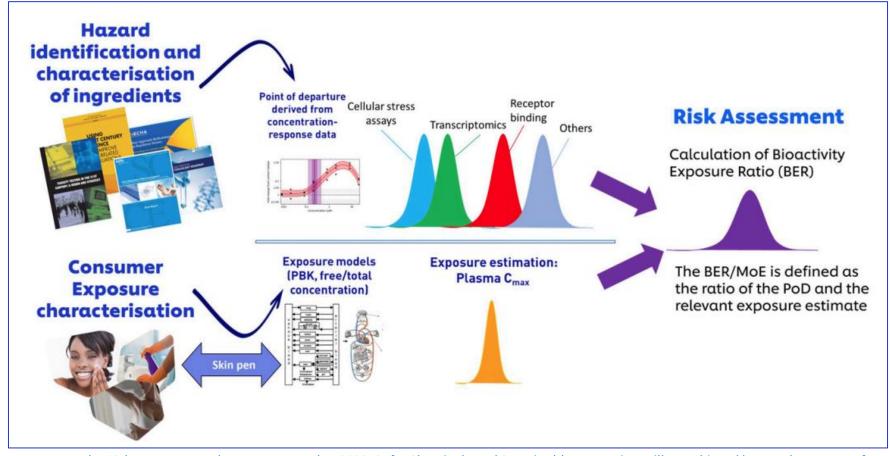
Advanced cell systems and microtissues







NGRA approaches enable the integration of non-animal data for decisions on the safety of chemicals used in cosmetics and other consumer products





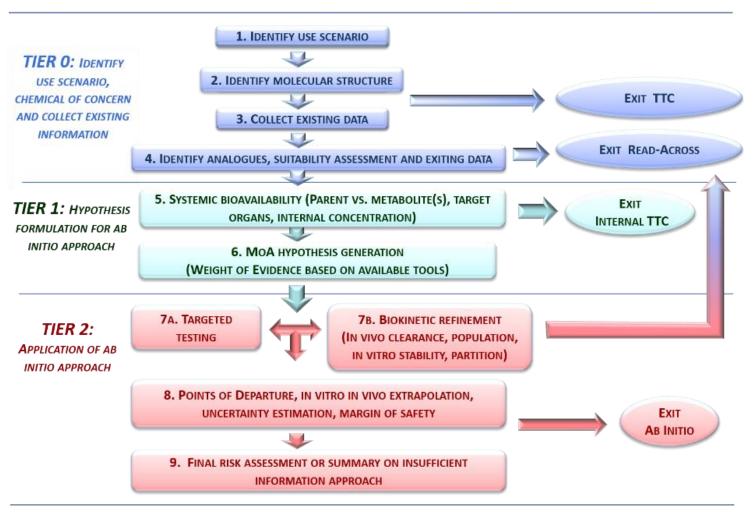


NGRA: from principles to application



Safety Evaluation Ultimately Replacing Animal Testing (SEURAT)

https://www.seurat-1.eu/



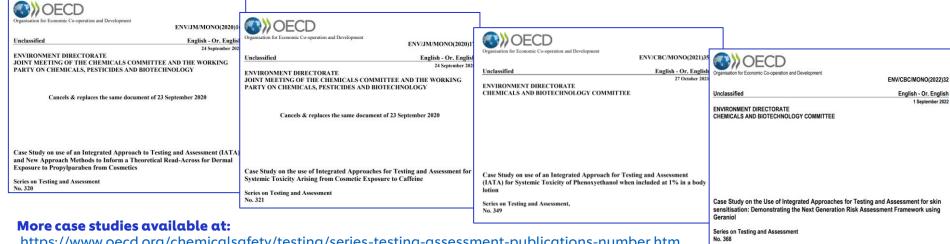


Berggren et al. Ab initio chemical safety assessment: A workflow based on exposure considerations and non-animal methods. Computational Toxicology, v. 4, p. 31-44, 2017.

NGRA: from principles to application

Ingredients	Toxicological endpoint	NAMs used	Advantages and valuables
1% phenoxyethanol	systemic toxicity	in silico (PBPK modeling, (Q)SAR, COSMOS nuclear Receptors Binding profilers, MIE Atlas, CERAPP, CoMPARA and CDOCKER), in vitro (in vitro metabolism, high throughput transcriptomics (HTTr), in vitro pharmacological profiling (SafetyScreen44) and cell stress panel)	To illustrates that one possible approach to evaluated both a parent chemical and its major stable metabolite in non-animal systemic toxicity risk assessment
0.1% coumarin	systemic toxicity	in silico ((Q)SAR, PBPK modeling), in vitro pharmacological profiling (SafetyScreen44 panel), immunomodulation panel (Diversity 8), ToxCast data in vitro cell stress panel, high-throughput transcriptomics, and ToxTracker tool	To demonstrate the value of integrating exposure science, computational modelling, and <i>in vitro</i> bioactivity data, to reach a safety decision without animal data
resorcinol	skin sensitization	in silico (read-across, TOXTREE, TIMES-M, TIMES-P), in chemico (protein binding assay; direct peptide reactivity assay, DPRA), in vitro (KeratinoSens, U-SENS, and SENS-IS)	To increase confidence, read-across was applied using analogues with skin sensitization data
caffeine	systemic toxicity	in silico (read-across, PBPK modeling, (Q)SAR, metabolite identification; Endocrine disruptome), in chemico (protein binding assay; direct peptide reactivity assay, DPRA), in vitro (genotoxicity assay and hepatocyte cultures)	Demonstrates the viability of a 10-step read-across framework in practice.
propyl paraben	skin sensitization	in silico, in chemico, and in vitro (KeratinoSens, U-SENS, h-CLAT, GARD and SENS-IS)	To show the important in considering the metabolization of chemical during risk assessment

Luo et al. The research progress of next generation risk assessment in cosmetic ingredients and the implications for traditional Chinese medicine risk assessment. Res. - Modern Chinese Medicine, v. 8, 100282, 2023.





https://www.oecd.org/chemicalsafety/testing/series-testing-assessment-publications-number.htm

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Unilever NGRA frameworks for decision-making on human safety:

accelerate the transition to animal-free innovation with safe and sustainable ingredients

Some examples of current research topics:

- √ Systemic toxicity
- ✓ Skin allergy
- ✓ Inhalation
- ✓ Developmental and Reproductive Toxicity (DART)







Unilever NGRA framework for decision-making on human safety: Systemic toxicity

NGRA tiered workflow for a systemic toxicity case study: 0.1% coumarin in consumer products



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

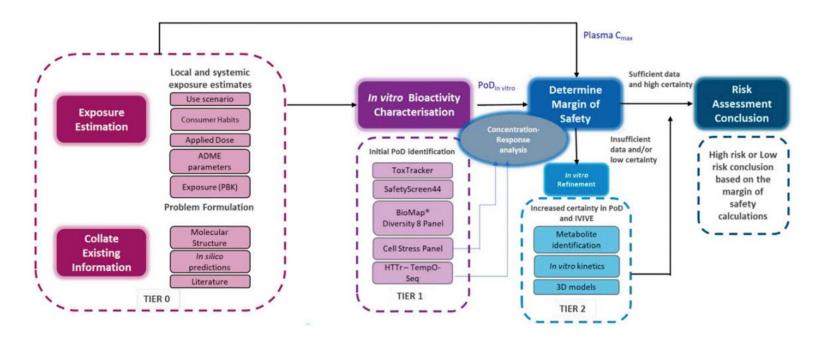
doi: 10.1093/toxsciAcfaa048 Advance Access Publication Date: April 10, 2020 Research article

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

Maria T. Baltazar, ¹ Sophie Cable, Paul L. Carmichael, Richard Cubberley, Tom Cull, Mona Delagrange, 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

Unilever Safety and Environmental Assurance Centre, Colworth Science Park, Sharnbrook, Bedfordshire MK44 1LO. UK

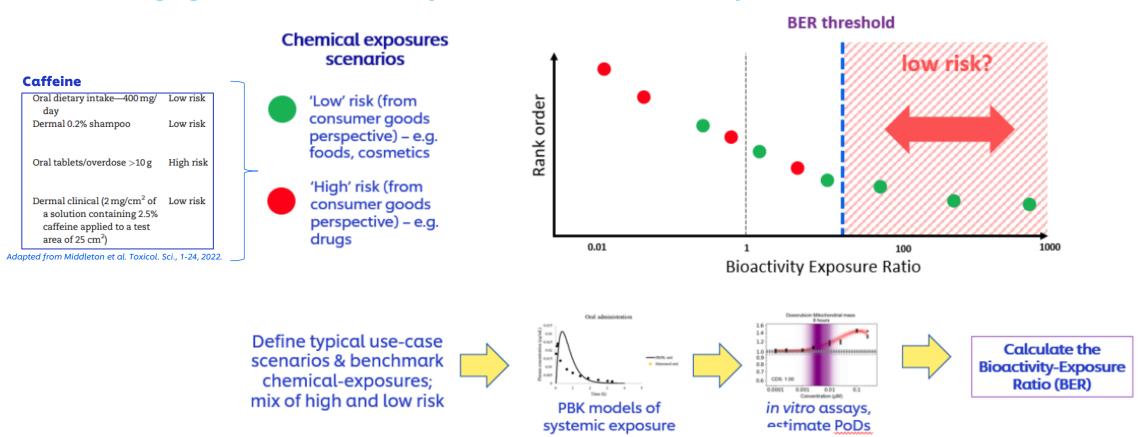
³To whom correspondence should be addressed. Fax: +44(0)1234 264 744. E-mail: maria.baltazar@unilever.com





Unilever NGRA framework for decision-making on human safety: Systemic toxicity

Benchmarking against historical safety decisions to evaluate how protective the toolbox & workflow are





Can we establish a BER threshold above which we consider a chemical exposure scenario to be low risk?

Unilever NGRA framework for decision-making on human safety:

Systemic toxicity



TOXICOLOGICAL SCIENCES, 2022, 1-24

https://doi.org/10.1093/toxsci/kfac068 Dryad Digital Repositiory DOI: https://doi:10.5061/dryad.fbg79cnx1 Advance Access Publication Date: 13 July 2022 Research article

Are Non-animal Systemic Safety Assessments Protective? A Toolbox and Workflow

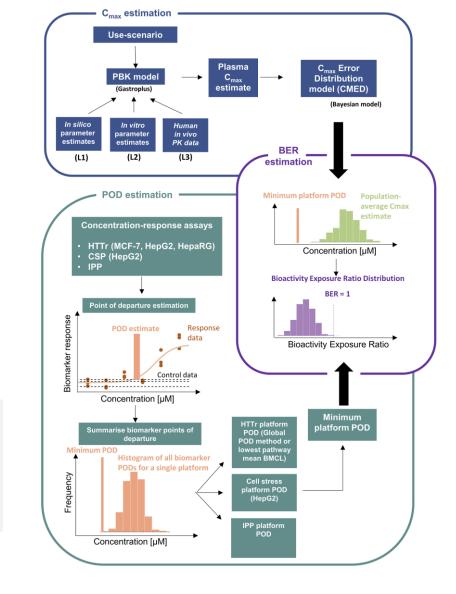
Alistair M. Middleton ,* Joe Reynolds,* Sophie Cable,* Maria Teresa Baltazar,* Hequn Li ,* Samantha Bevan, Paul L. Carmichael,* Matthew Philip Dent,* Sarah Hatherell,* Jade Houghton,* Predrag Kukic,* Mark Liddell,* Sophie Malcomber,* Beate Nicol,* Benjamin Park,† Hiral Patel,† Sharon Scott,* Chris Sparham,* Paul Walker ,† and Andrew White*

*Unilever Safety and Environmental Assurance Centre, Bedfordshire MK44 1LQ, UK; †Cyprotex Discovery Ltd, Cheshire SK10 4TG, UK and ‡Charles River Laboratories, Cambridgeshire, CB10 1XL, UK

¹To whom correspondence should be addressed at Unilever Safety and Environmental Assurance Centre, Colworth Science Park, Sharnbrook, Bedfordshire MK44 1LQ, UK. E-mail: alistair.middleton@unilever.com.

Promising data for 24 different exposure scenarios covering 10 chemicals as a proof-of-concept study:

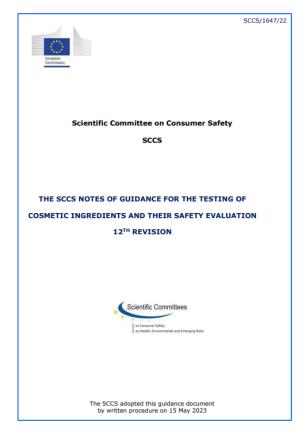
- up to 69% (9/13) of the low-risk scenarios could be identified
- protective against all (5/5) the high-risk scenarios

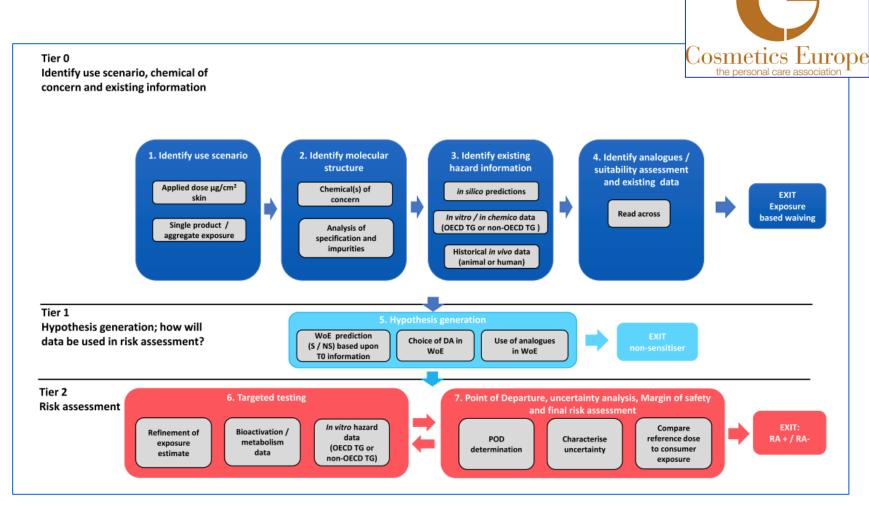


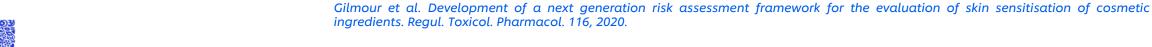


NGRA framework for human skin sensitisation

Scientific Committee on Consumer Safety (SCCS) 12th Notes of Guidance, 2023







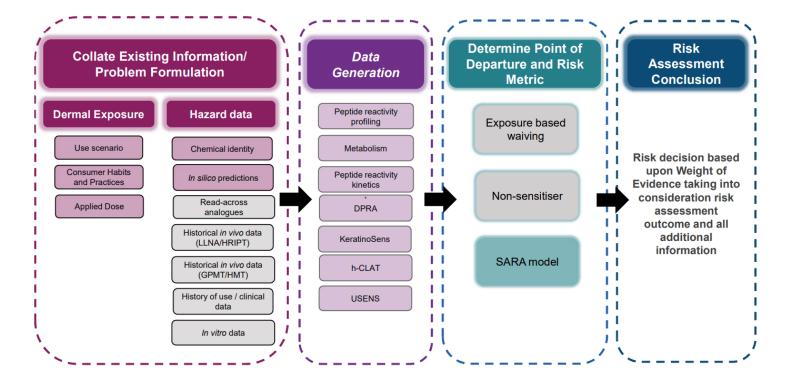


Unilever NGRA framework for decision-making on human safety: Skin allergy

NGRA tiered workflow for skin sensitisation case study materials in consumer products:

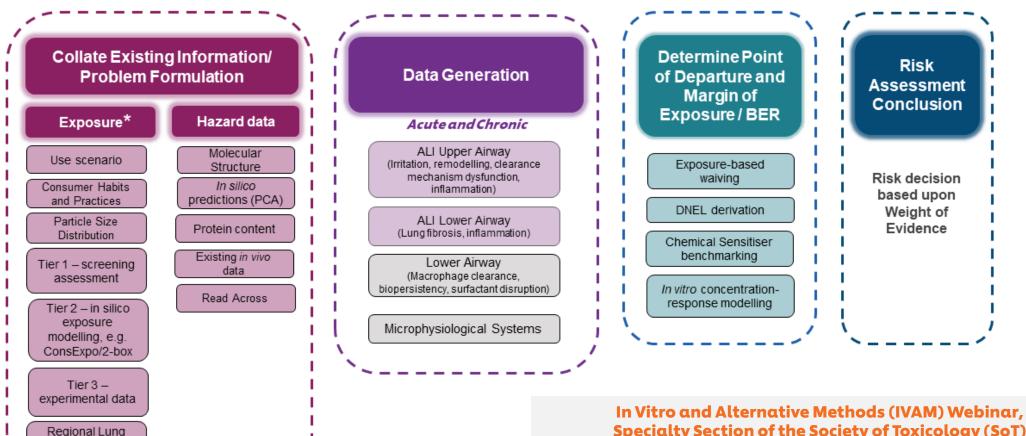
- coumarin in face cream (0.1%) and deodorant (1%)
- lactic acid in a shampoo (0.1%) and face cream (2%)
- · geraniol at 0.02% in a face cream
- formaldehyde at 0.2% in a hand cream







Unilever NGRA framework for decision-making on human safety: <u>inhalation</u>



* https://www.youtube.com/watch?v=r5rGoihAbGI

Deposition

modelling

Specialty Section of the Society of Toxicology (SoT)

https://www.toxicology.org/groups/ss/IVSS/Events.asp

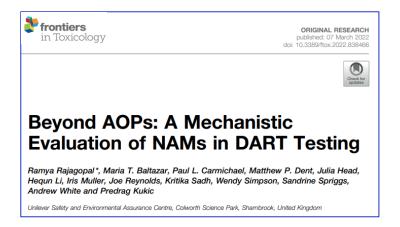
Recording - Inhalation Toxicity: In Vitro to Human Risk Assessment:

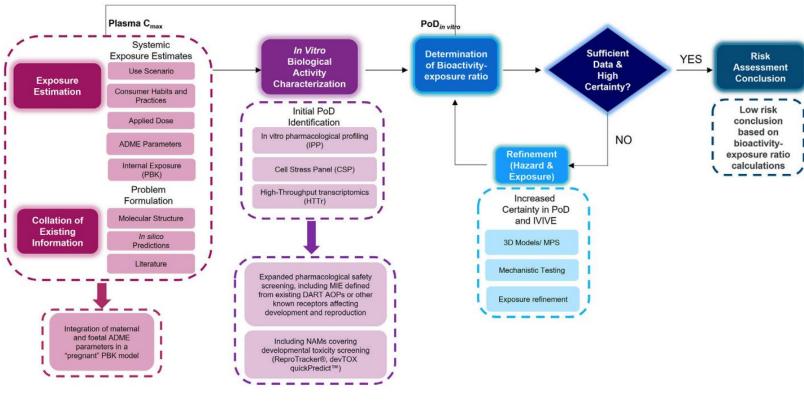
https://player.vimeo.com/video/674986429 (January 2022)



Unilever NGRA framework for decision-making on consumer safety:

<u>Developmental and Reproductive Toxicity (DART)</u>

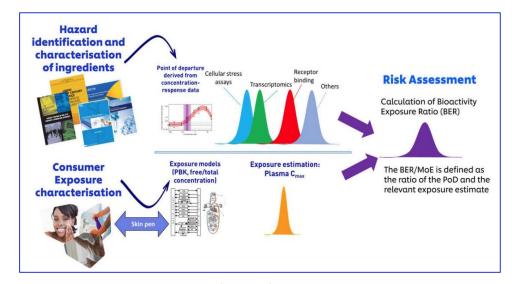






Concluding remarks

- NGRA is a framework of non-standard, bespoke datageneration, driven by the risk assessment questions
 - ✓ Exposure led
 - ✓ Human relevant
 - ✓ Non-animal tools and approaches
 - ✓ Weight-of-evidence

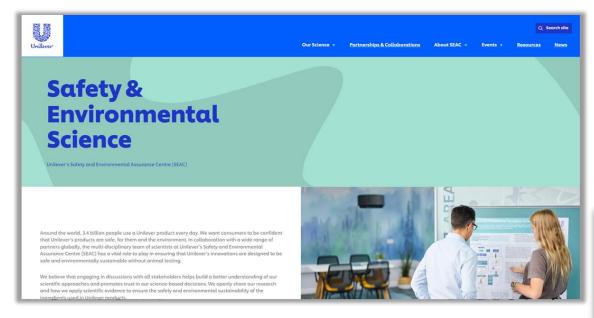


Fentem, J. Altern. Lab. Anim. (ATLA), v. 51, p. 90-101, 2023.

- Bioactivity exposure ratio (BER) is determined by the ratio of human exposure to the point of departure for the most sensitive assay
- Case studies have demonstrated it is possible to integrate exposure estimates and bioactivity points of departure to make a safety decision
- NGRA tools and approaches are available now and research into more frameworks continues



Safety & Environmental Sciences website: https://seac.unilever.com/



- Microsite covering:
 - Our Science → case studies
 - Partnerships & Collaborations
 - About SEAC
 - Events
 - Resources
 - News



 Summary of SEAC science capabilities for expert audiences: industry, regulator & academic scientists



https://seac.unilever.com/our-science/case-studies/coumarin/

Série de Webinars em Ciência In Vitro















https://seac.unilever.com/news/2022/seac-scientists-collaborate-to-launch-latam-in-vitro-science-webinars/

Em português e/ou espanhol!

Tópicos já abordados:

- Sensibilização dérmica
- Irritação ocular e dérmica
- Segurança ambiental
- Processo de validação de métodos alternativos
- Status regulatório no Brasil e América Latina
- Química analítica na avaliação de segurança humana e ambiental

Gravação dos Eventos passados podem ser acessados:







Master Class in Animal-Free Safety Assessment for Cosmetics

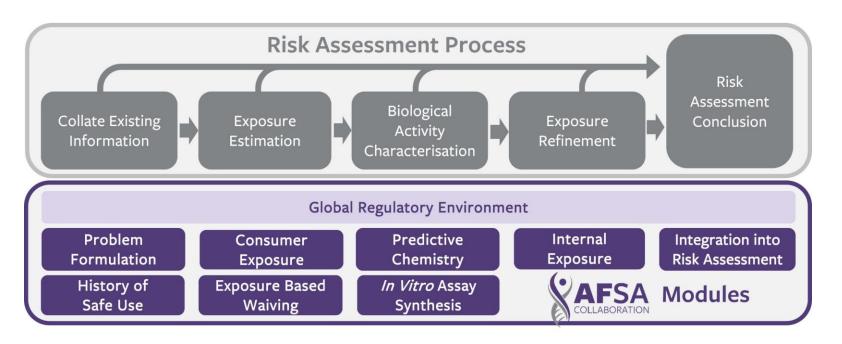
Covering Risk Assessment from start to finish

Audience:

- Product and chemical safety assessors and regulators
- Regulatory affairs and compliance specialists
- CRO/GLP laboratories
- Small and medium enterprises
- Graduate students
- Non-governmental organizations



https://www.afsacollaboration.org/masterclass/







Obrigado





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