Next Generation Risk Assessment for Occupational Chemical Safety – a Real World Example with Sodium-2-hydroxyethane sulfonate

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![](_page_0_Picture_6.jpeg)

![](_page_0_Picture_7.jpeg)

### **Overview**

1.) How are worker/occupational safety assessments performed currently.

2.) Overview of NGRA for systemic toxicity assessment.

3.) Opportunities and a strategy for integrating NGRA into worker safety assessment.

4.) Case study chemical: Sodium-2hydroxyethane sulfonate (SI)

![](_page_1_Picture_6.jpeg)

![](_page_1_Picture_7.jpeg)

![](_page_1_Picture_8.jpeg)

### Current worker safety assessment approach

- Workers can be exposed to substances that could be detrimental to health if not assessed and managed adequately.
- Typically, assessment of risks from occupational exposures come from comparisons of exposures with occupational limit values, e.g., occupational exposure limits (OELs) or Derived No-effect levels (DNELs).
- A large proportion of OELs/DNELs are based on outputs of toxicological studies performed using experimental animals.

		I	
	Worker exposure scenario 1		↓ Exposure > OEL/DNEL: RMM needed
	Workerexposure		Exposure < OEL/DNEL:
F	Scenario 2 Risk management measures (RMM)	Î	No RMM needed

![](_page_2_Picture_6.jpeg)

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### The need for non-animal safety assessments

![](_page_3_Picture_2.jpeg)

### Human Relevance

![](_page_3_Picture_4.jpeg)

Societal Attitudes/Consumer Preference

Resource/time

constraints

22.12.2009 EN Official Journal of t	he European Union	L 342/59
REGULATION (EC) No 1223/2009 OF THE EUR	OPEAN PARLIAMENT AND OF TH	COUNCIL
of 30 Nove	mber 2009	
on cosmeti	ic products	
(rec	ast)	
(Text with El	EA relevance)	
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EURO- PEAN UNION.	(5) The environmental concerns metic products may raise are c cation of Regulation (EC) No Parliament and of the Council	that substances used in cos- onsidered through the appli- 1907/2006 of the European of 18 December 2006 con-
Having regard to the Treaty establishing the European Commu- nity, and in particular Article 95 thereof,	cerning the Registration, Eva Restriction of Chemicals (REA pean Chemicals Agency (*), w of environmental safety in a c	luation, Authorisation and CH) and establishing a Euro- hich enables the assessment ross-sectoral manner.
Having regard to the proposal from the Commission,		
Having regard to the opinion of the European Economic and Social Committee $\left( ^{i}\right) ,$	(6) This Regulation relates only to to medicinal products, medic ucts. The delimitation follo detailed definition of cosmetic	o cosmetic products and not al devices or biocidal prod- ws in particular from the products, which refers both
Acting in accordance with the procedure laid down in Article 251 of the Treaty (2),	to their areas of application a use.	nd to the purposes of their
Whereas:	(7) The assessment of whether a	product is a cosmetic prod-
<ol> <li>Council Directive 76/768/EEC of 27 July 1976 on the approximation of the laws of the Member States relating to cosmetic products (?) has been significantly amended on several occasions. Since further amendments are to be made, in this marticular case it should be recast as one of the state of the state of the set of the state of the state of the set of the state of the state of the set of the state of the state of the set of the state of the set of the set of the set of the set of the set of the state of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the s</li></ol>	uct has to be made on the ba ment, taking into account all c Cosmetic products may includ gels and oils for the skin, face pastes, powders), make-up p hygienic powders, toilet soaps	sis of a case-by-case assess- haracteristics of the product e creams, emulsions, lotions, masks, tinted bases (liquids, worders, after-bath powders deodorant soaps, perfumes

# Regulatory Change (e.g. EU Cosmetic regulation)

	Contents lists available at ScienceDirect	Regulatory
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Archives of Toxicology (2023) 97:3075–3083 https://doi.org/10.1007/s00204-023-03601-5	
REGULATORY TOXICOLOGY	

Analysis of health concerns not addressed by REACH for low tonnage chemicals and opportunities for new approach methodology

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![](_page_3_Picture_13.jpeg)

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

![](_page_4_Figure_2.jpeg)

![](_page_4_Picture_3.jpeg)

"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 Tox7:20-26

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### **Introduction** to 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

![](_page_5_Picture_4.jpeg)

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

ICCR 9 principles of NGRA Following an appropriate appraisal of existing information Using a tiered and iterative approach Using robust and relevant methods and strategies

### Principles for documenting NGRA:

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

Dent et al 2018. Computational Toxicology Volume 7, August 2018, Pages 20-26

	Computational Toxicology 7 (2018) 20-26	
	Contents lists available at ScienceDirect	
	Computational Toxicology	
ELSEVIER	journal homepage: www.elsevier.com/locate/comtox	

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

![](_page_5_Picture_13.jpeg)

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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>j</sup>, Nashira Vieira O'Reilly Cabral Posada<sup>l</sup>, Craig Weiss<sup>p</sup>, Hajime Kojima<sup>f</sup>

![](_page_5_Picture_15.jpeg)

### Testing the principles with case studies

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![](_page_6_Figure_2.jpeg)

![](_page_6_Figure_3.jpeg)

### Key tools in our NGRA approach for Systemic Toxicity – Bioactivity assays

![](_page_7_Figure_2.jpeg)

![](_page_7_Figure_3.jpeg)

![](_page_7_Picture_4.jpeg)

Cable et al., (2024) in preparation

Middleton et al., (2022) Toxicol Sci, 189, 124-147

### What about a larger subset of chemicals? (Part 1):

#### Selection of chemicals and exposure scenario

- Chemicals with well-defined human exposures
- Traditional safety assessment available
- High certainty in the risk classification for each chemical-exposure scenario
- Risk class is relative to consumer health

Chemical	Exposure scenario							
Oxybenzone	2 scenarios: 0.5%; 2% sunscreen	Low risk						
Caffeine	2 scenarios: 0.2% shampoo & coffee oral consumption 50 mg	Low risk						
Caffeine	10g – fatal case reports	High risk						
Coumarin	<b>3 scenarios:</b> 4 mg/d oral consumption; 1.6% body lotion (dermal); TDI 0.1 mg/kg oral	Low risk						
Hexylresorcinol	3 scenarios: Food residues (3.3 ug/kg); 0.4% face cream; throat lozenge 2.4 mg	Low risk						
ВНТ	Body lotion 0.5%	Low risk						
Sulforaphane	<b>2 scenarios:</b> Tablet 60 mg/day; food 4.1-9.2 mg/day	Low risk						
Niacinamide	<b>4 scenarios:</b> oral 12.5-22 mg/kg; dermal 3% body lotion and 0.1 % hair condition	Low risk						
Doxorubicin	75 mg/m2 IV bolus 10 min; 21 days cycles; 8 cycles	High risk						
Rosiglitazone	8 mg oral tablet	High risk						
Paraquat	Accidental ingestion 35 mg/kg	High risk						

### 10 chemicals - 25 exposure scenarios

![](_page_8_Figure_9.jpeg)

#### BER=lowest POD/Plasma Cmax Blue: low risk chemical-exposure scenario Yellow: high risk chemical-exposure scenario

Blue shaded region BER> 11

Middleton AM et al (2022). Are Non-animal Systemic Safety Assessments Protective? A Toolbox and Workflow. Toxicological

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TOXICOLOGICAL SCIENCES, 189(1), 2022, 124-1-

# NAM Systemic toolbox remains protective (>90%) when 38 additional chemicals and 70 exposure scenarios were tested (Part 2):

![](_page_9_Figure_2.jpeg)

Toolbox not protective for 3/46 of the high-risk exposure scenarios

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- Chemical- Exposure scenarios not protective for:
  - Warfarin therapeutic oral dose
  - Trimellitic anhydride inhalation exposure
- On a case-by-case basis (e.g., depending on wider literature), deviation may be possible.

![](_page_9_Picture_8.jpeg)

(11)

### **Integrating DART Safety Assessment into Existing NGRA Framework:**

![](_page_10_Figure_2.jpeg)

March 2022,

# Key tools in our NGRA approach for Systemic Toxicity – Bioactivity assays

![](_page_11_Figure_2.jpeg)

### Points of Departure (PODs) from NAMs can be protective even if not predictive

![](_page_12_Figure_2.jpeg)

![](_page_12_Picture_3.jpeg)

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'... understanding how construction of NAM-based POD estimates may offer equivalent levels of public health protection as the PODs produced by animal methods ...' Paul Friedman *et al*, 2023, Computational Toxicology, 28, 10028

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Paul Friedman et al., 2020. Toxicol. Sci **173**, 202-225

# Application of NGRA to occupational safety assessment – challenges vs cosmetic sector

- Often simultaneous exposure over multiple routes (dermal and inhalation) and limited biomonitoring data to calibrate PBK models.
- Different exposure estimation models
- Large number of scenarios to consider (factory, professional, cleaning etc).
- Complex supply chains and ways of working under worker safety
   regulations (lead
   registrant/confidential information).

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# Perceived industry challenges for uptake of occupational NGRA

Complexity Resource

Uncertainty Confidence Regulatory acceptance Conservatism

Case studies needed to improve confidence of chemical sector with NGRA and to address worker safety specific challenges that make its uptake more challenging from a (non) technical perspective.

![](_page_13_Picture_10.jpeg)

"there is a fear, or assumption, that nonanimal methods will be rejected by regulators, borne out of experience that they must provide information directly equivalent to that of animal tests."

### NGRA for occupational safety assessment

![](_page_14_Figure_2.jpeg)

![](_page_14_Picture_4.jpeg)

### **Problem formulation**

![](_page_15_Figure_2.jpeg)

![](_page_15_Picture_4.jpeg)

# Problem formulation, in silico predictions and literature data

- Sodium-2hydroxyethane sulfonate (SI) is widely used in the manufacture of alkyl isethionate surfactants.
- Historical toxicology studies: 90-day oral (NOAEL: 200 mg/kg bw/day) and developmental toxicity (rats) (NOAEL: 1000 mg/kg bw/day).
  - Comprehensive in silico profiling performed Lack of any concerns.

![](_page_16_Figure_5.jpeg)

### **Exposure assessment – external:**

![](_page_17_Figure_2.jpeg)

![](_page_17_Picture_4.jpeg)

### **Exposure Assessment within REACH consortium**

![](_page_18_Figure_2.jpeg)

• 3 consortium members covering the entire life cycle

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 Confidential business information (CBI) seen as blocker to perform exposure led approach

### Solution - independent consultant

- 1) To collect CBI (manufacturing process, volume...) and convert them to PROCs, ECS etc
- To identify the **worst case** scenario(s) and refine them further with additional CBI
- 3) To provide the **worst case** exposure values (mg/kg/d) within the entire life cycle to the consortium for modelling.

### **External exposure assessment:**

Exposure Scenario

- Life cycle assessment performed to identify relevant scenarios of use (process categories/PROCs).

- From these PROCs, exposures are typically estimated using variety of modelling software packages (e.g., ECETOC TRA, ART etc).

- Although worker exposure to SI occurs from a limited number of scenarios, approach can still be followed for more complex supply chains.

- External exposure estimates serve as inputs to SI specific PBK model.

DDUC 3

DDOC 1

PROC 2

PROC 1

PROC number:	Description:
PROC 1	Chemical production or refinery in closed process without likelihood of exposure or processes with equivalent containment conditions.
PROC 2	Chemical production or refinery in closed continuous process with occasional controlled exposure or processes with equivalent containment conditions
PROC 3	Manufacture or formulation in the chemical industry in closed batch processes with occasional controlled exposure or processes with equivalent containment condition
PROC 4	Chemical production where opportunity for exposure arises
PROC 5	Mixing or blending in batch processes
PROC 7	Industrial spraying
PROC 8a	Transfer of substance or mixture (charging and discharging) at non-dedicated facilities
PROC 8b	Transfer of substance or mixture (charging and discharging) at dedicated facilities
PROC 9	Transfer of substance or mixture into small containers (dedicated filling line, including weighing)
PROC 13	Treatment of articles by dipping and pouring
PROC 14	Tabletting, compression, extrusion, pelletisation, granulation
PROC 15	Use as laboratory reagent
PROC 21	Low energy manipulation and handling of substances bound in/on materials or articles
PROC 28	Manual maintenance (cleaning and repair) of machinery

PROC 15

PROC 21

PROC 28

20

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N		
	X	

										11100120		11100 10		
Manufacture of substance	$\checkmark$	$\square$	V					$\checkmark$				V		V
Use as Intermediate	$\checkmark$	$\square$	V					$\checkmark$	$\checkmark$			$\checkmark$		V
Formulation		Ø	V	V	V	V	V		V		V	V		
Repacking								$\checkmark$						
Use in Printing inks							V			$\checkmark$			V	
Use as processing aid	$\checkmark$	Ø	V	V			V	$\checkmark$						
Service Life of fabrics													$\checkmark$	

DPOC 7

PROC 8a

PROC 8h

PROC 9

PROC 13

PROC 14

DPOC 5

### **Exposure assessment – internal:**

![](_page_20_Figure_2.jpeg)

![](_page_20_Picture_4.jpeg)

### Internal exposure assessment - PBK

- Worst-case exposures were selected by consultant using simple procedure.
- Procedure converts inhalation and dermal exposures into an intravenous infusion.

 Inherently conservative (e.g., 100% inhalation bioavailability)

W con sc	Vorker tributing cenario	Dermal exposure estimate	Inhalation exposure estimate	Max total time per day (TT)	Duration per occasion	Frequency	Exposure rate dermal	Exposure rate inhalation	Rate of systemic exposure from dermal	Rate of systemic exposure from inhalatio n	Total systemic exposure rate	Total dose/day	GastroPlus infusion dose/occasion
Pf 'Trai	ROC 8b nsfer into	mg/kg bw/day	mg/m <sup>3</sup>	h	h	per day	mg/h	mg/h	mg/h	mg/h	mg/h	mg	mg
drum	s – indoor'	0.034	0.38	8	8	1	0.26	0.47	0.00043	0.47	0.47	3.75	3.75
S	Ste	ep 1		Exposu	ire rat	e derm	al = D h/	ermal day = C	expos ).26 mg	ure es <sup>.</sup> g/h	timate	* 60 kg	bw/8
	Ste	ep 2	Exp	osure	rate ir	nhalati	on = i / 8 /	nhalati n/day =	ion exp 0.47 n	oosure ng/h	e estim	ate * 10	m3/day
	Ste	ep 3	F Pc	late of tentia	syster lly abs	mic exp sorbab	oosure le dos	e from se (PAD	derma ) = 0.2	ıl = Exp 6 * 0.1	oosure 7/100 =	rate de = 0.0004	rmal * 3 mg/h
	Ste	ep 4	Rat	e of sy * ir	stemio nhalat	c expos ion bic	sure fr Davail	om inh ability	nalatio = 0.47	on = Ex * 100/′	posure 100 = 0	e rate in .47 mg/	halation h
	Ste	ep 5	Toto	al syste	emic e	xposur	re rate 0.00	e = derr 0043 +	nal +i 0.47 =	inhala 0.47	tion ra	te of ex	posure =
	Ste	ep 6	Toto	al dose	e/day =	= total	syster	nic exp mg/	oosure ⁄day	rate *	8 h/da	ıy = 0.47	* 8 = 3.75

### Internal exposure assessment - PBK

- 3 PBK simulation types deterministic (pregnant individual), probabilistic (1: general worker, 2: pregnant).
- Models built using SI specific ADME data, e.g., hepatic metabolism.
- Probabilistic models included ranges for uncertain parameters (e.g., fraction unbound) and variable population parameters (e.g., blood flows).

![](_page_22_Figure_5.jpeg)

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![](_page_22_Figure_6.jpeg)

### In Vitro Biological Activity Characterisation

![](_page_23_Figure_2.jpeg)

![](_page_23_Picture_4.jpeg)

### Limited bioactivity demonstrated across 5 NAM assays:

- SI showed limited bioactivity across all assays.
- Lowest PoD came from the high throughput transcriptomics assay (MCF-7 cell line), based on a single probe significantly more sensitive than others.
- Some deviation from nominal concentration was observed in dose-confirmation assays due to a dosing error.
- Final PoD taken forward for risk characterisation = 104 µM.

![](_page_24_Figure_6.jpeg)

Platform	CSP (Global PoD)	IPP	HTTr (MCF-7) (BIFROST)	HTTr (HepG2) (BIFROST)	HTTr (HepaRG) (BIFROST)	HTTr (MCF-7) (BMDExpress)	HTTr (HepG2) (BMDExpress)	HTTr (HepaRG) (BMDExpress)	Stemina/ devTox quickpre dict	Reprotracker
PoD (μM) (Nominal)	7300	>100	150	2500	1200	2860	4210	1040	>1000	>1000
Corrected PoD (µM) 🗙	5044	>100	104	1728	829	1976	2909	719	>1000	>1000

![](_page_24_Picture_8.jpeg)

PoDs adjusted based on achieved concentrations to increase confidence in QIVIVE.

### **Bioactivity Exposure Ratio Determination and Safety Decision**

![](_page_25_Figure_2.jpeg)

![](_page_25_Picture_4.jpeg)

### **Bioactivity Exposure Ratio Determination and Safety Decision**

- Lowest PoD compared with exposure estimates.
- Most conservative BER (calculated from lowest PoD and 95<sup>th</sup> percentile pregnant population Cmax) was 130.
- In combination with existing data and lack of *in silico* alerts, current occupational exposures to SI are a low risk.
- Decision consistent with one that could be made using historical animal data (RCRs <1).</li>

![](_page_26_Picture_6.jpeg)

RCR = risk characterisation ratio = Exposure/DNEL

![](_page_26_Figure_8.jpeg)

Route	Type of effect	Risk characterisation type	DNEL	PROC 8B Exposure estimate (ECETOC TRA)	RCR (ECETOC TRA)	Worst-case BER (ECETOC TRA)
Inhalation	Systemic effects - long term	Quantitative	4.9 mg/m3	0.38 mg/m3	0.078	
Dermal	Systemic effects - long term	Quantitative	294 mg/kg bw/day	0.034 mg/kg bw/day	<0.001	130
Combined routes, systemic long term					0.078	

### Wrap up

- Current lack of published examples of application of NGRA to worker safety.
- Framework developed here includes multiple options for refinement and is applicable to large subset of substances to which worker exposure occurs.
- Simple procedure to convert external inhalation/dermal exposures to infusion dose can be used by consultants to manage feasibility of PBK modelling and NGRA under REACH WoW.
- NGRA frameworks such as this can be implemented to address shortcomings of tonnage driven testing requirements.

### For SI:

- Limited bioactivity across a broad range of bioactivity assays. Consistent with *in silico* profiling results and existing knowledge on the substance.
- Current occupational exposures (and any RMM already in place) is sufficient for protection of workers.
- Performance of additional animal testing would not provide any human health benefit.

![](_page_27_Picture_10.jpeg)

# Acknowledgements:

NGRA (especially this one) is a multidisciplinary exercise requiring the involvement of a multitude of individuals across a broad range of expertise areas.

- SEAC safety scientists: Richard Cubberley, Matt Dent, Jade Houghton, Predrag Kukic, Sophie Malcomber, Sue Martin, Beate Nicol, Joe Reynolds, Gordon Riley, Sharon Scott, Carl Westmoreland, Mesha Williams, Kathryn Wolton
- Clariant: Catherine Breffa, Joachim Eichhorn, Fabian Grimm, MoungSook Lee, Susann Fayyaz
- Leuna Vantage: Caroline Chaine, Tristan Zellman,
- ERM: Willemien Wieland, Colin Smith
- Bibra: Chris Waine, Dan Threlfall
- Vitis regulatory: Peter Sladen, Mike Crookes

![](_page_28_Picture_9.jpeg)

 The numerous CROs where data is generated (Charles River, Toxys, Cyprotex, Bioclavis, Stemina, Eurofins, Pharmacelsus).

Contents of talk today form the basis of a paper titled "Next Generation Risk Assessment for Occupational Chemical Safety – a Real World Example with Sodium-2-hydroxyethane sulfonate" submitted last week – watch this space!

![](_page_28_Picture_12.jpeg)

See (poster/oral) presentations from SEAC colleagues at BTS 2024: Katy Wilson, Sophie Cable, Julia Fentem, Kathryn Wolton.