

Exposure-based toxicity testing and translation into global requirements

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Unilever

Exposure-based toxicity testing

- **Background**
- **Leading with Exposure**
- **Examples from the world of Cosmetics**
- **Translation into global requirements**

Ensuring Safe Ingredients for Cosmetic Products

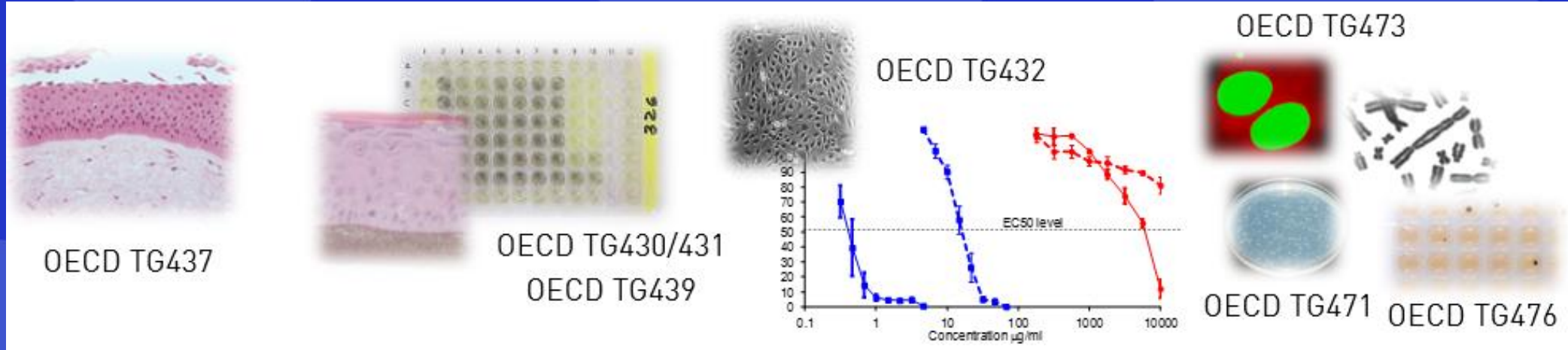
Risk Based Approach:

Considers both the hazard and the exposure to evaluate the risk

Can we safely use x % of ingredient in product?

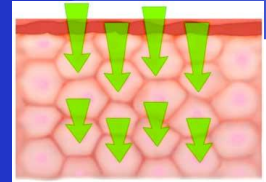
No pre-market authorization for most product types across the world – emphasis on manufacturer to show safe use

Use of Existing OECD *In Vitro* Approaches

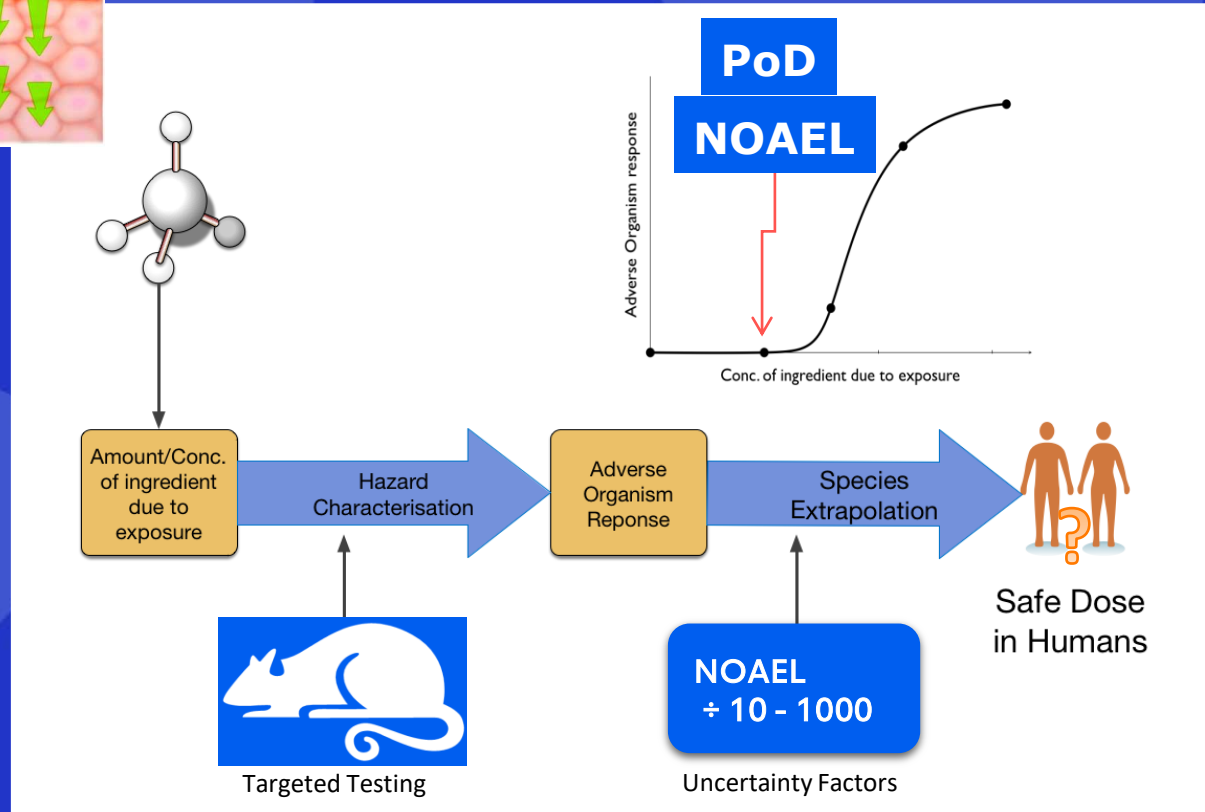


**Skin and eye irritation; skin sensitization;
phototoxicity; mutagenicity**

What About Systemic Toxicity?



Is it safe?



— e.g. 90 Day Repeat Dose Study —

A new non-animal paradigm is needed...

...but replacement of animal test data is not the answer

Existing
approaches

Threshold of Toxicological
Concern

(Yang et al 2017)

<https://doi.org/10.1016/j.fct.2017.08.043>

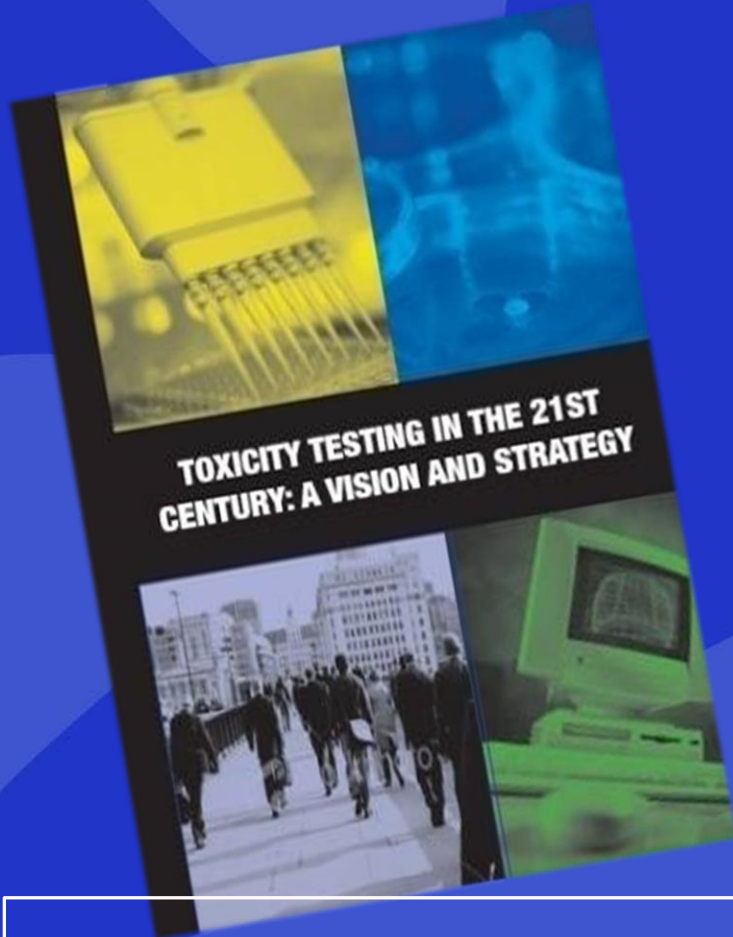
Read across

History of Safe Use

(Neely et al 2011)

<https://doi.org/10.4103/0971-6580.85882>

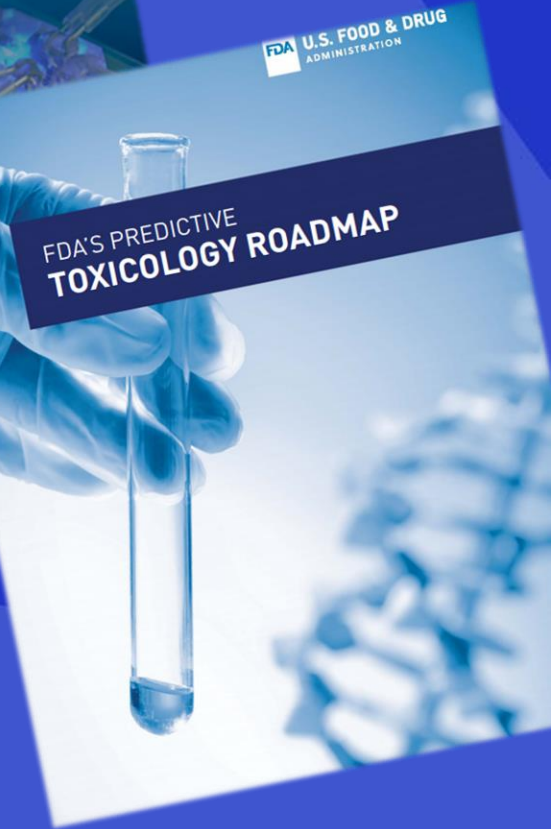
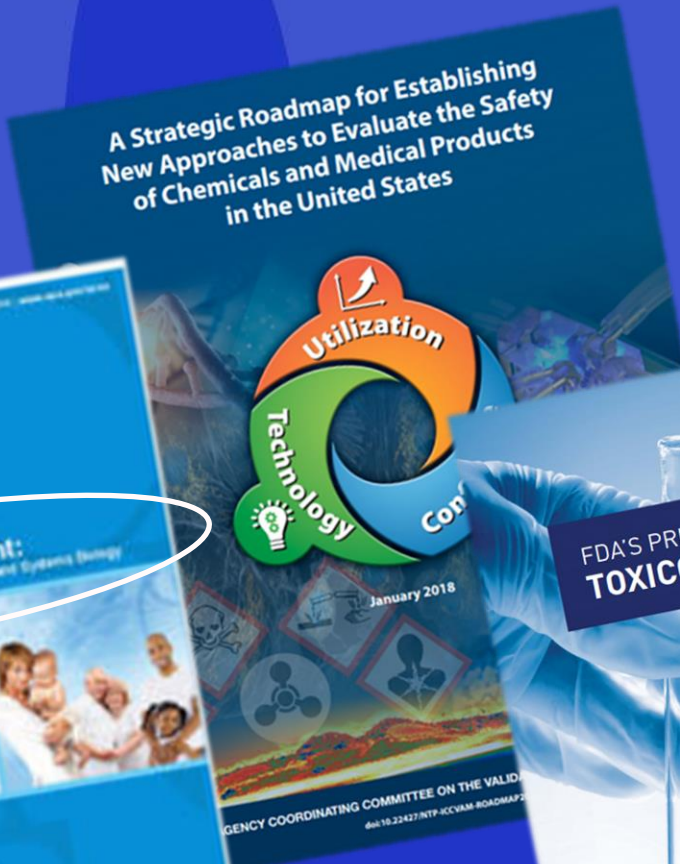
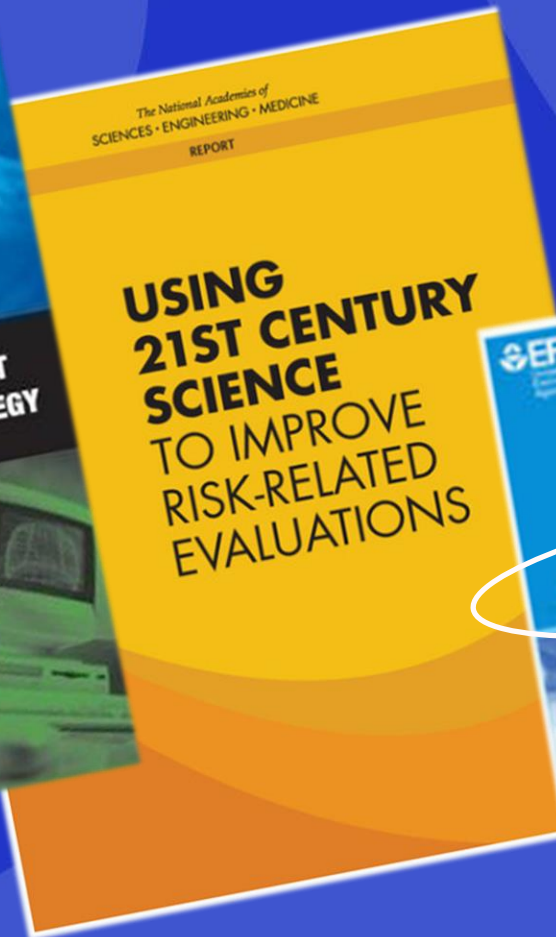
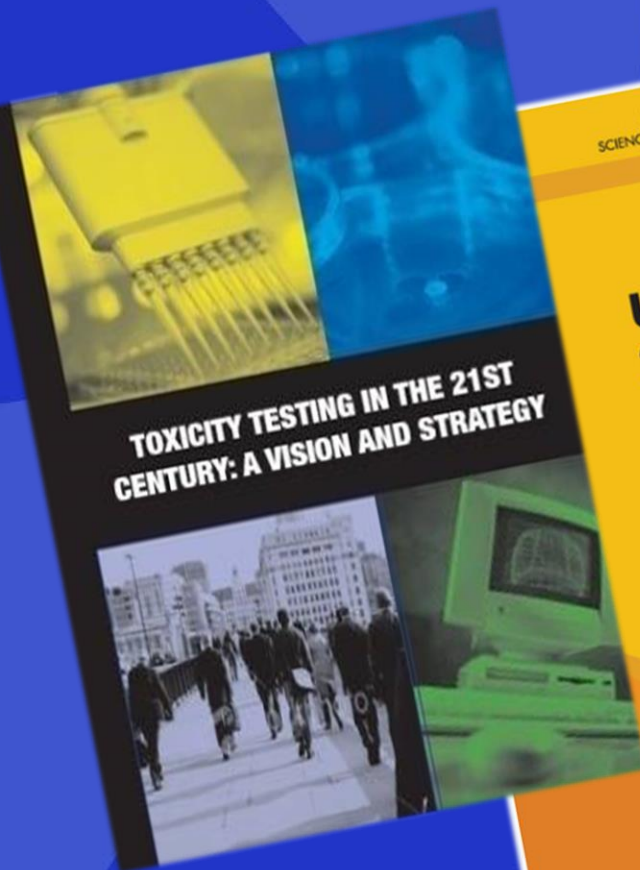
2007 Toxicity Testing in the 21st Century (TT21C)



“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.”

Perturbation of 'toxicity pathways' and stress responses

TT21C + NGRA



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

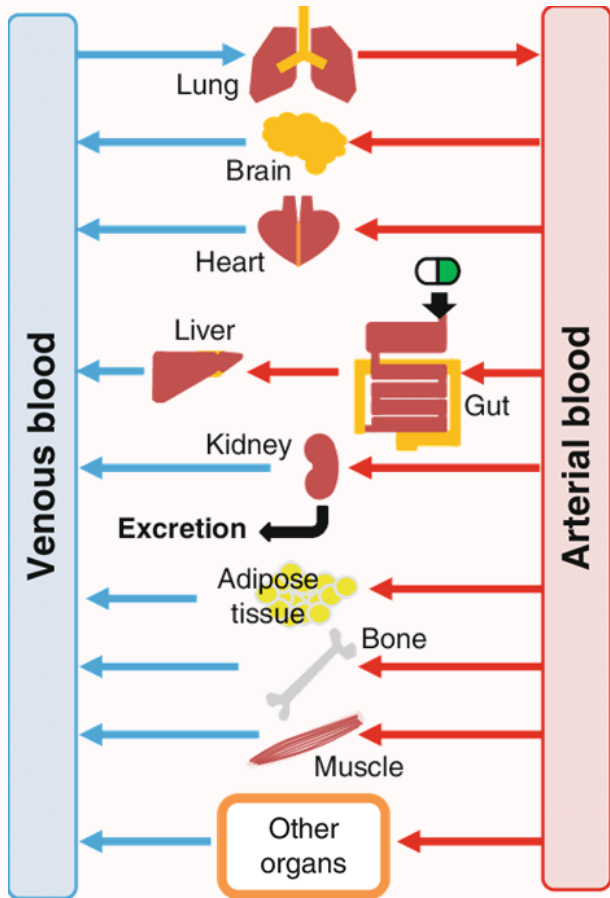
3 Principles describe how a NGRA should be conducted:

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

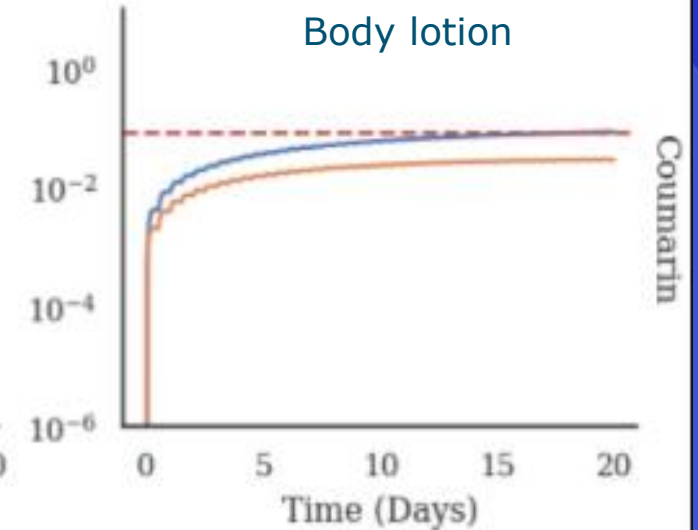
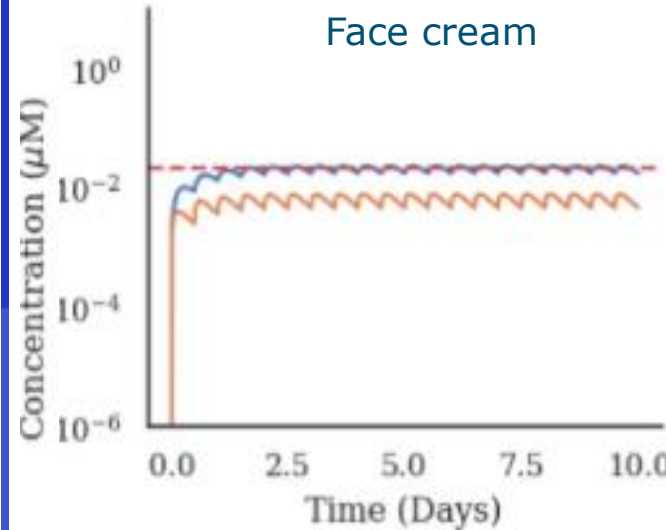
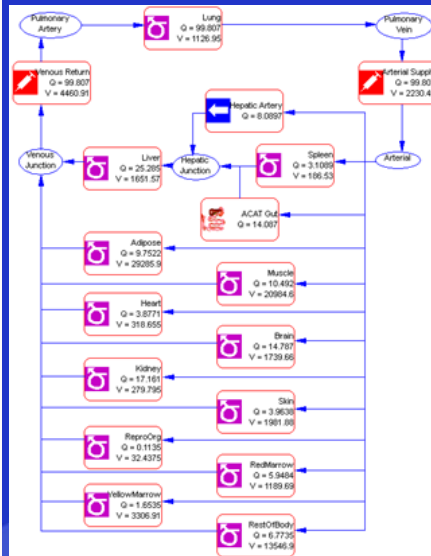
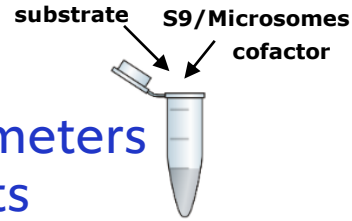
2 Principles for documenting NGRA:

- » Sources of uncertainty should be characterized and documented
- » The logic of the approach should be transparently and documented

PBK (Physiologically Based Kinetic) Modelling



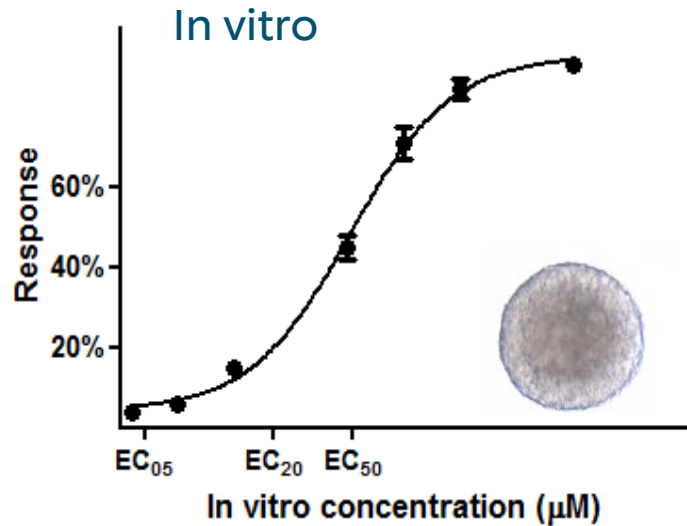
Model Input:
Physiological parameters
Partition coefficients
Kinetic constants (in vitro)



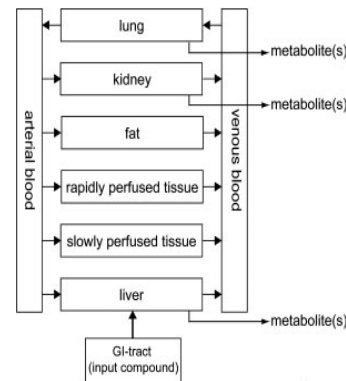
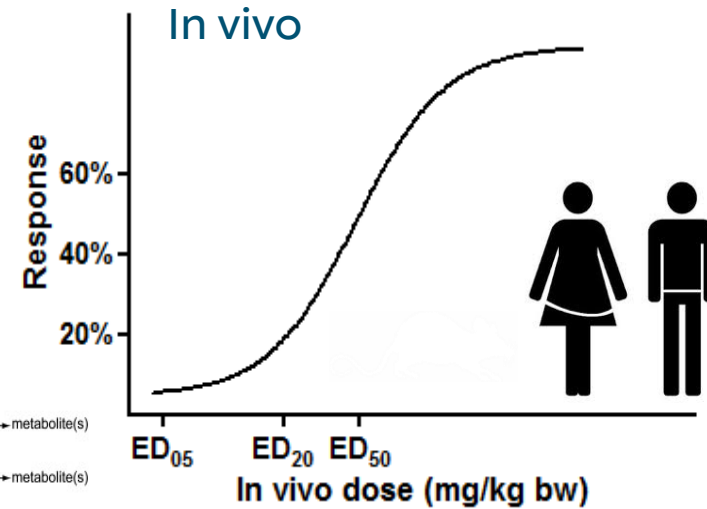
Moxon et al., (2020) TIV 63

<https://doi.org/10.1016/j.tiv.2019.104746>

One Interpretation of TT21C: Quantitative *in vitro* to *in vivo* extrapolation



**PBK
reverse
dosimetry**



points of departure (PoD)
for risk assessment

Another Interpretation: Tox21/ToxCast ~700 HTS Biological Pathways Assays



National Institute of Environmental Health Sciences (NIEHS) / National Toxicology Program (NTP)



National Center for Advancing Translational Sciences (NCATS)



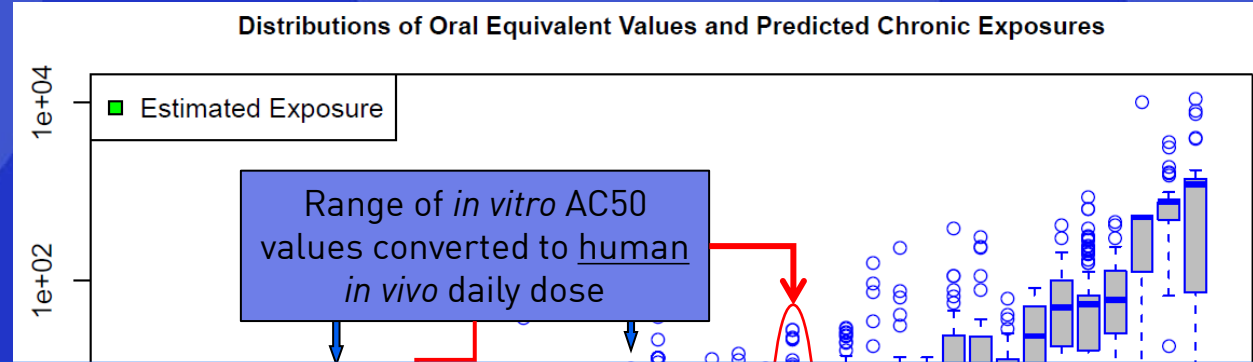
U.S. Food and Drug Administration (FDA)

National Center for Computational Toxicology (EPA)

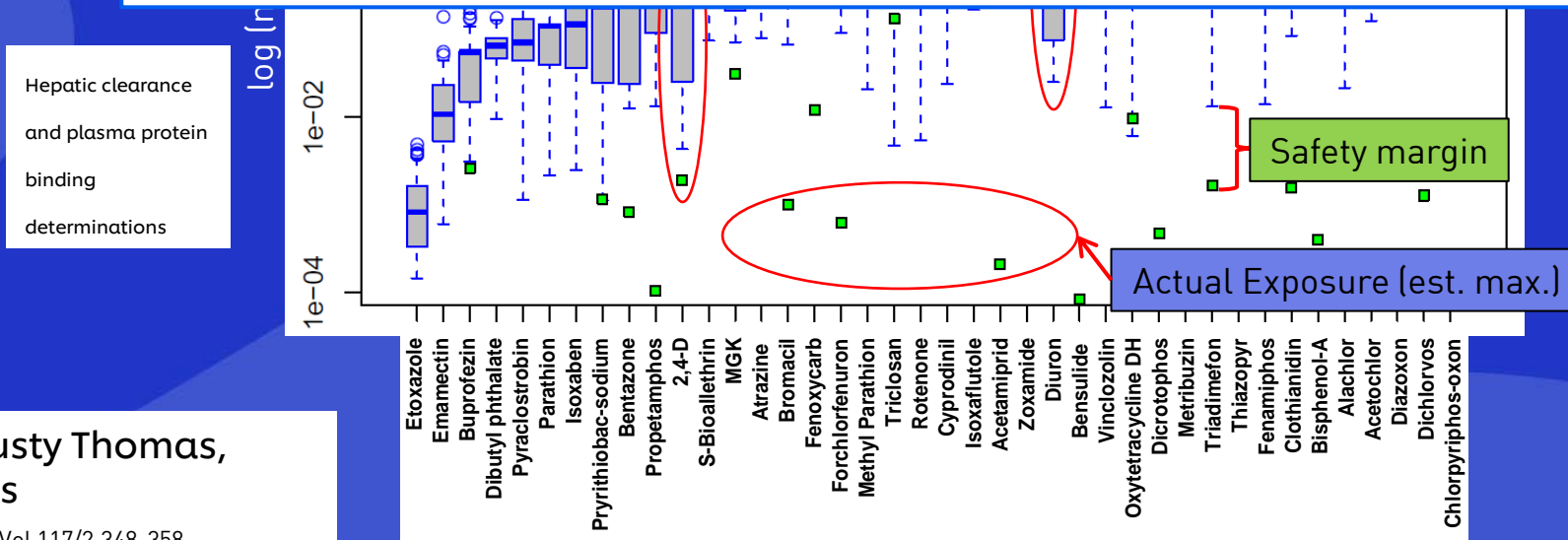


<https://www.epa.gov/chemical-research/toxicity-forecasting>

In Vitro Bioactivity vs Bioavailability



“Protection not Prediction”



Slide from Dr Rusty Thomas, EPA, with thanks

Rotroff, *et al.* *Tox.Sci* 2010 Vol 117/2 348-358

<https://doi.org/10.1093/toxsci/kfq220>

EPA, NTP, HC, A*STAR, ECHA, EFSA, JRC, RIVM...

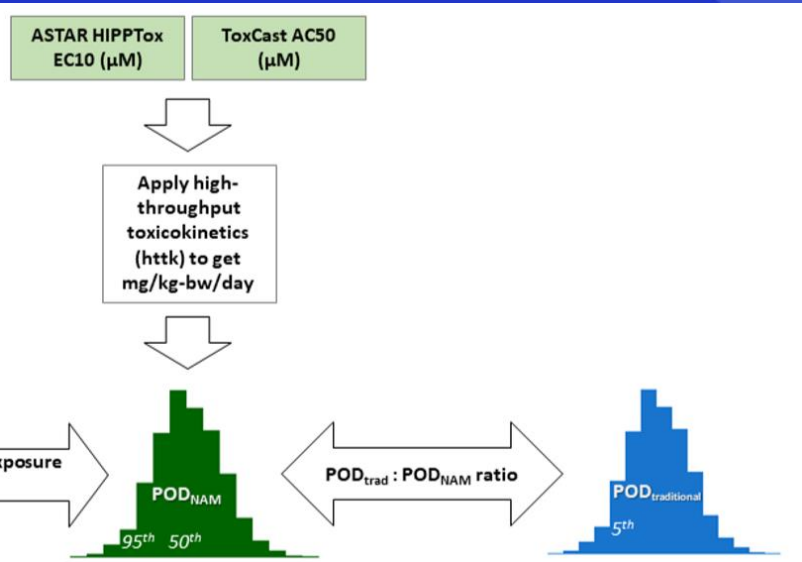
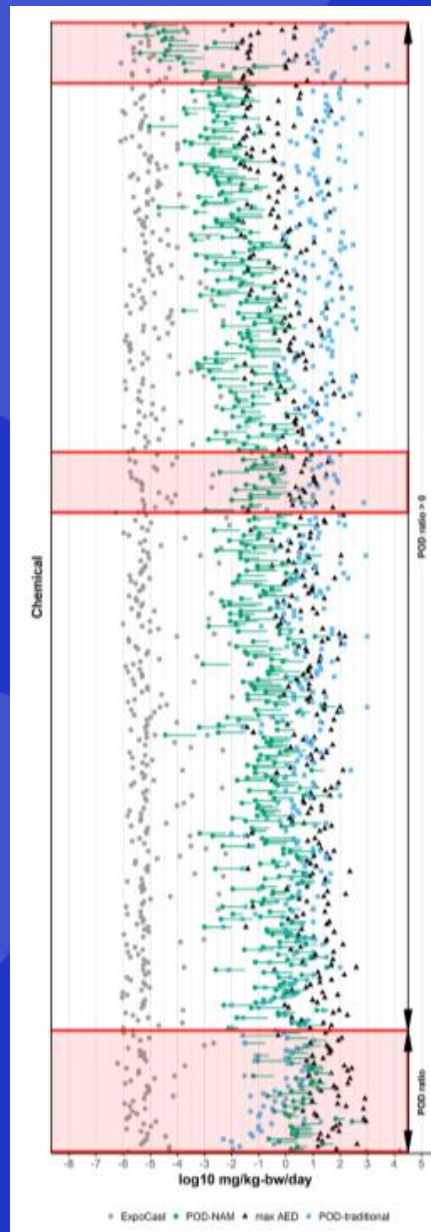


414/448 chemicals =
92% of the time this
naïve approach appears
conservative

Efforts to Reduce Animal Testing at EPA

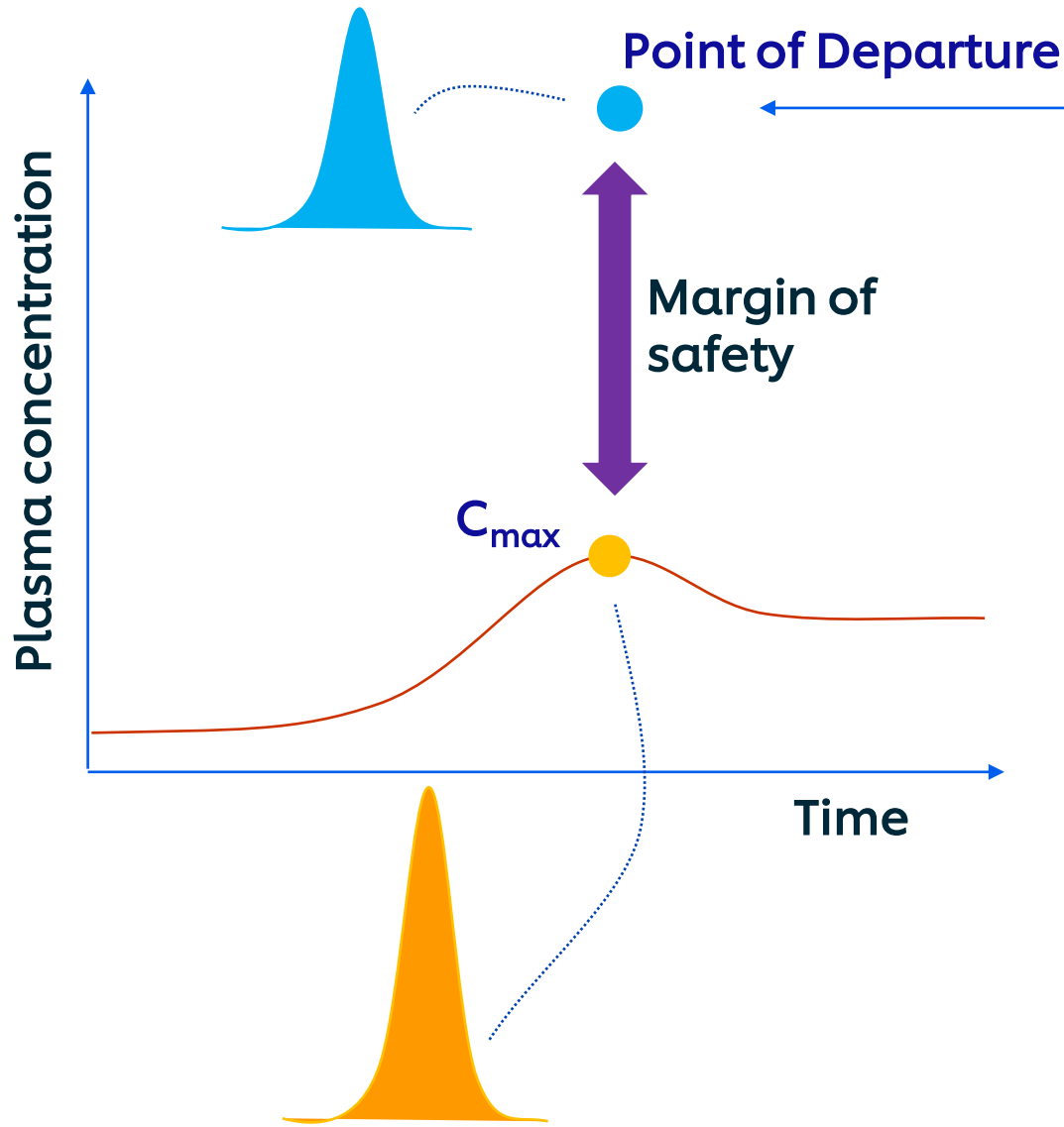
On September 10, 2019, EPA Administrator Andrew Wheeler signed a directive that prioritizes efforts to reduce animal testing. The memorandum calls for the agency to:

- reduce its requests for, and funding of, mammal studies by 30 percent by 2025, and
- eliminate all mammal study requests and funding by 2035.

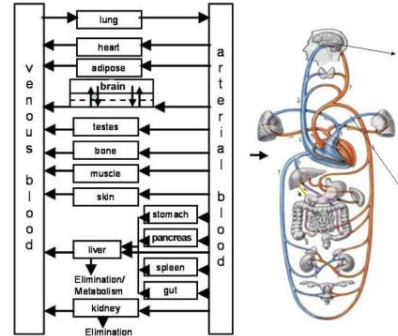


Katie Paul-Friedman et al. 2019 *Tox Sci* 173(1): 202-225

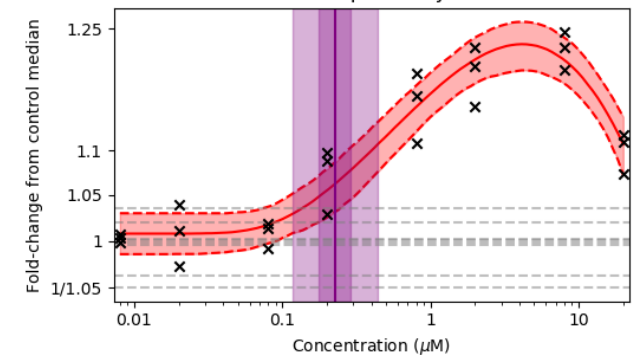
The Margin of Safety Approach



Exposure models
(PBK, free/total
concentration)



Point of departure
derived from *in vitro*
concentration-response



Case Study Approach... Imagine we have no data for: Coumarin

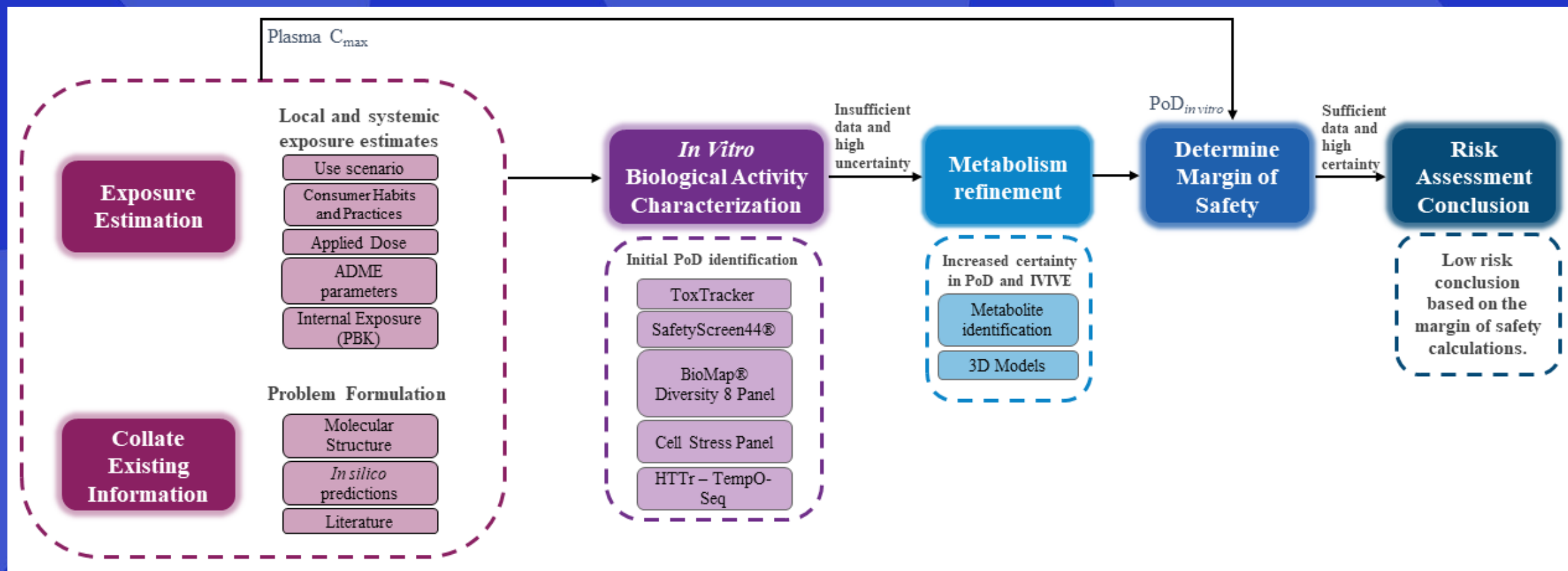


Safety assessment required for 0.1% coumarin in Body Lotion



Safety assessment required for 0.1% coumarin in Face Cream

Case Study Framework



Baltazar et al., (2020) *Toxicological Sciences* 176(1): 236-252
<https://doi.org/10.1093/toxsci/kfaa048>

Collection of Existing Data and ADME Parameters

Name	Coumarin
CAS	91-64-5
MW	146.14 g/mol
Log P	1.39
Solubility	0.96 mg/mL in phosphate buffer
ECCS Class	Class 2 (Metabolism)
R_{b2p}	0.7
F_{ub}	0.31
Cl_{int}	929 L/h

Chemistry determinations:

- Partition coefficient logP
- Peptide binding potential

In vitro determined:

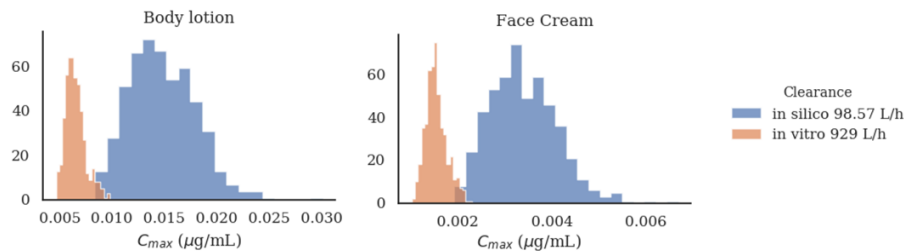
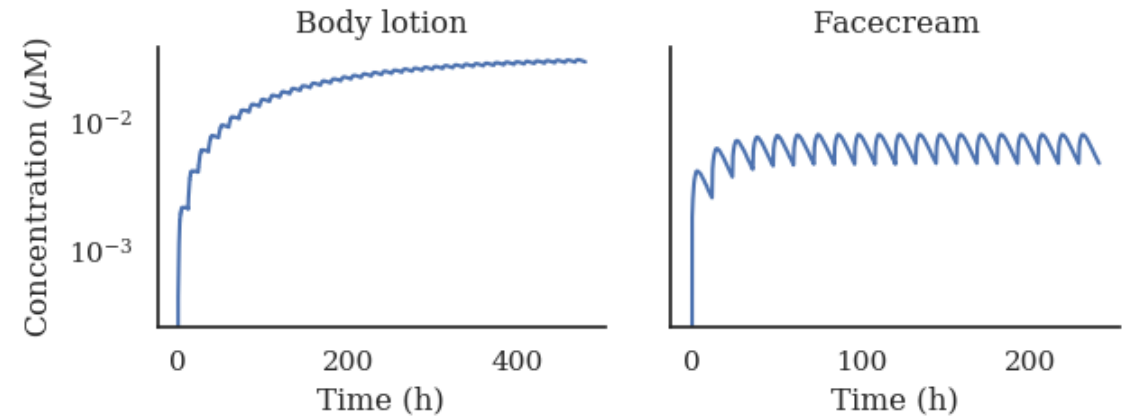
- Kinetic solubility
- Thermodynamic solubility
- Metabolic & chemical stability
- Stability in human plasma
- Plasma protein binding
- Partitioning in blood
- Skin penetration parameters

Systemic Bioavailability using PBK Modelling

Key output parameters from uncertainty analysis:

Parameter	Face cream (applied 2x/day)	Body lotion (applied 2x/day)
Plasma C _{max} total (μM)	0.023	0.10
95th percentile C _{max} (μM)	0.032	0.14

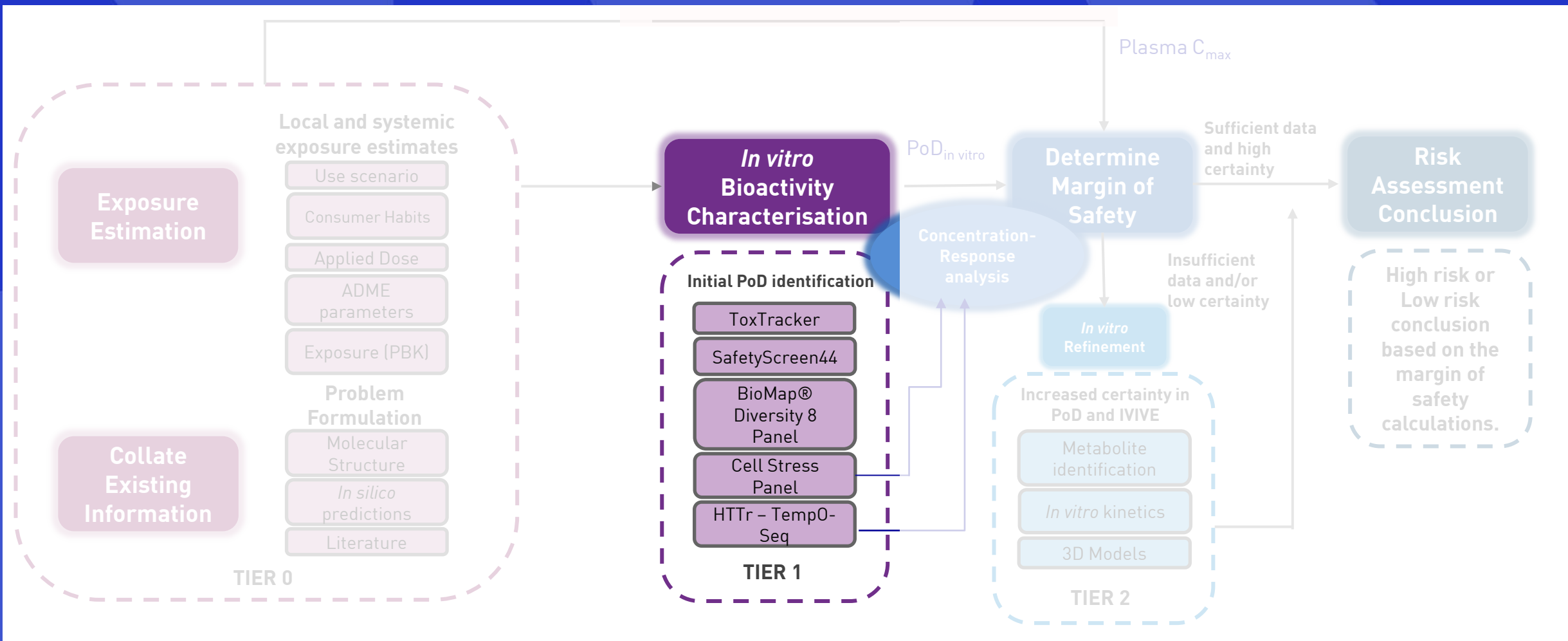
0.1% Face cream & body lotion in Europe



Uncertainty & Population Variability

Physiologically-based kinetic modelling using GastroPlus® v9.5. Estimations based on experimental data (Clint, fup, bpr, solubility, LogP). Skin penetration parameters were fitted against skin penetration data.

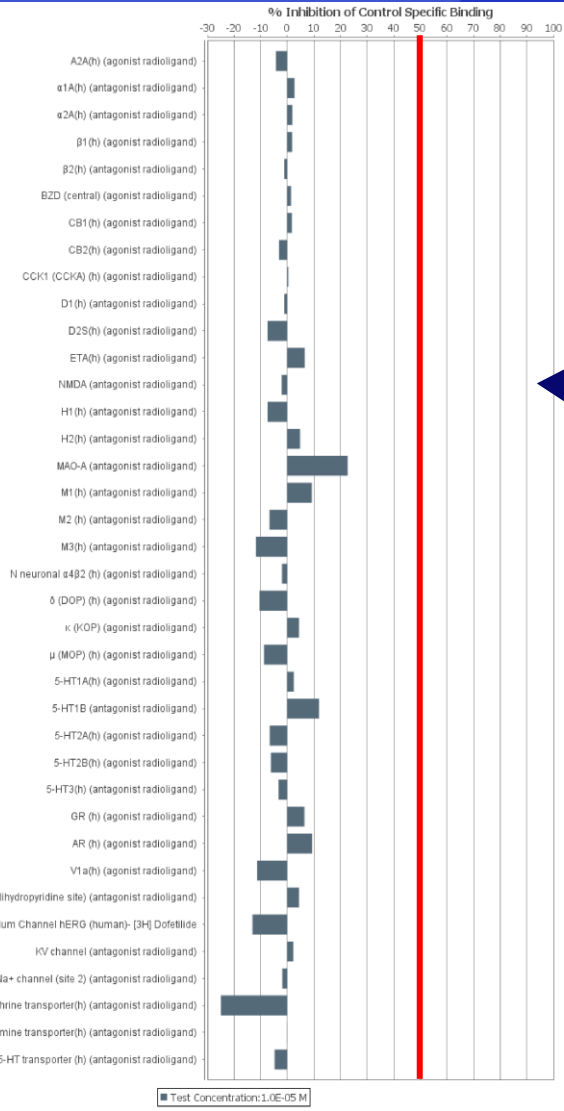
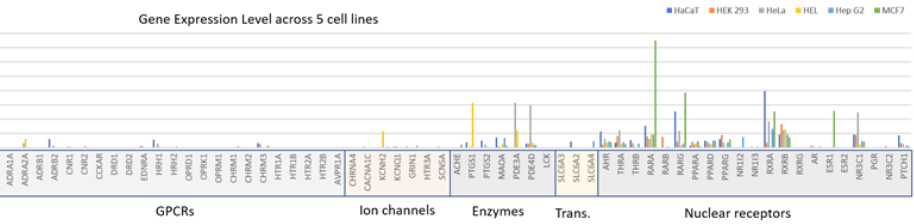
Ab Initio NGRA Framework



In Vitro Bioactivity: Safety Screen

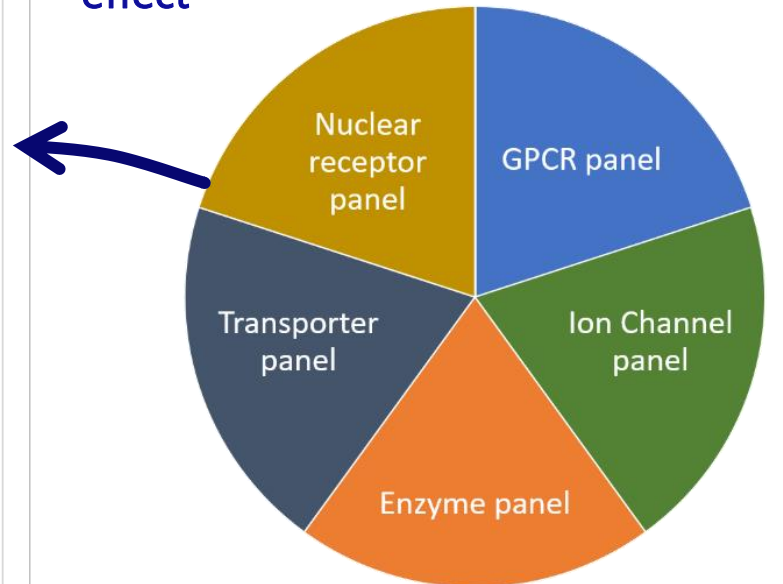
Bowes et al 2012. Nature Reviews: Drug Discovery 11 909-922

FAMILY	ASSAY	FORMAT	ITEM #	FAMILY	ASSAY	FORMAT	ITEM #
GPCR				NOREPINEPHRINE			
ADENOSINE	A _{2A}	•	0004	GABA CHANNELS	BZD (central)	•	0028
ADRENERGIC	alpha _{1A}	•	2338	GLUTAMATE CHANNELS	NMDA	•	0066
	alpha _{2A}	•	0013	NICOTINIC CHANNELS	N neuronal α4β2	•	3029
	beta ₁	•	0018	SEROTONIN CHANNELS	5-HT ₂	•	0411
	beta ₂	•	0020	Ca ²⁺ CHANNELS	Ca ²⁺ channel (L dihydropyridine site)	•	0161
CANNABINOID	CB ₁	•	0036	K ⁺ CHANNELS	hERG (membrane preparation)	•	1868
	CB ₂	•	0037	Na ⁺ CHANNELS	K _v channel	•	0166
CHOLECYSTOKININ	CKK ₁ (CKK ₁)	•	0039		Na ⁺ channel (site 2)	•	0169
DOPAMINE	D ₁	•	0044	NUCLEAR RECEPTORS			
	D ₂	•	1322	STEROID NUCLEAR RECEPTORS	AR	•	0933
ENDOTHELIN	ET _A	•	0054		GR	•	0469
HISTAMINE	H ₁	•	0870	KINASES			
	H ₂	•	1208	CTK	Lck kinase	•	2906
MUSCARINIC	M ₁	•	0091	OTHER NON-KINASE ENZYMES			
	M ₂	•	0093	AA METABOLISM	COX ₁	•	0726
	M ₃	•	0095		COX ₂	•	0727
OPIOID & OPIOID-LIKE	delta ₁ (DOP)	•	0114	MONOAMINE & NEUROTRANSMITTER	acetylcholinesterase	•	0363
	kappa (KOP)	•	1971		MAO-A	•	0443
	mu (MOP)	•	0118	PHOSPHOESTERASES	PDE3A	•	2432
SEROTONIN	5-HT _{1A}	•	0131		PDE4D2	•	2434
	5-HT _{1B}	•	0132				
	5-HT _{2A}	•	0471				
	5-HT _{2B}	•	1333				
VASOPRESSIN	V _{1a}	•	0159				
TRANSPORTERS							
DOPAMINE	dopamine transporter	•	0052				



All binding and enzymatic assay results were negative at 10 uM

No receptor/target-led pharmacological effect

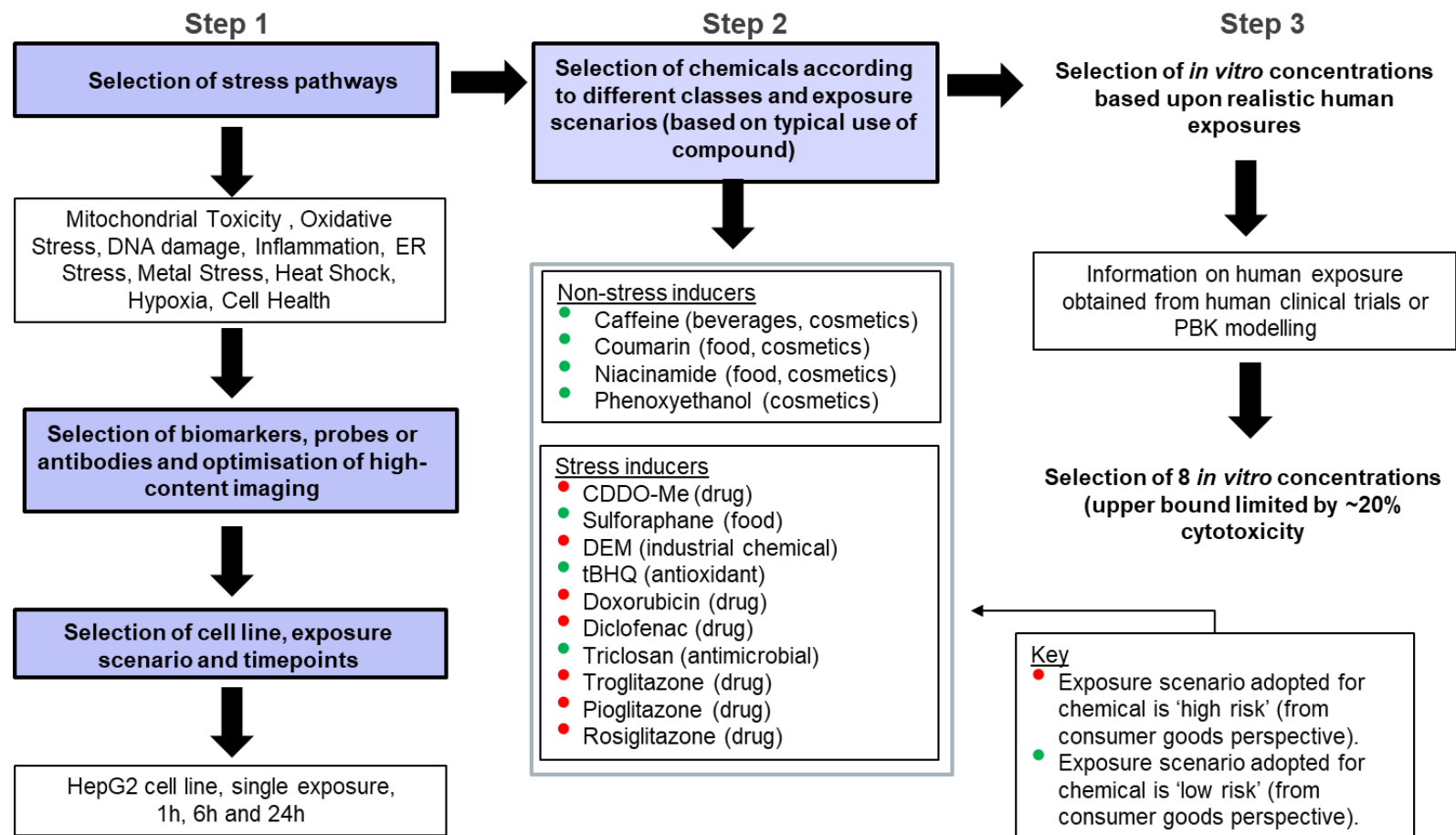


SafetyScreen44™ Panel

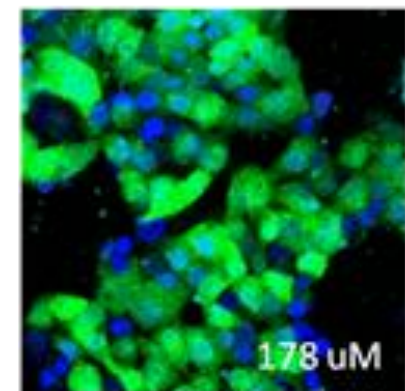
In Vitro Bioactivity: Cell Stress Panel

Hatherell et al., 2020 *Tox Sci* 176(1): 11-33 <https://doi.org/10.1093/toxsci/kfaa054>

~40 Biomarkers; 3 Timepoints; 8 Concentrations; ~10 Stress Pathways

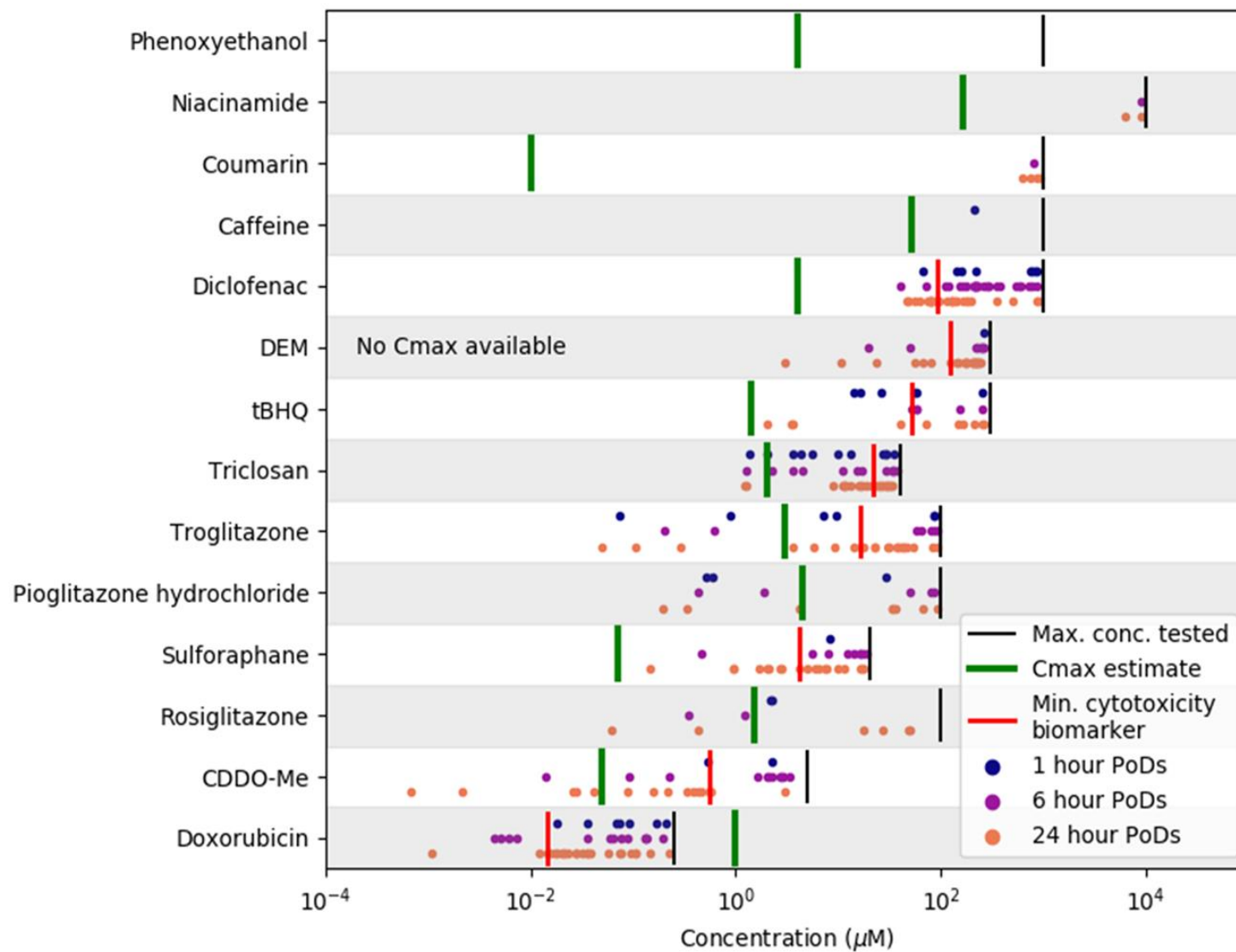


Mitochondrial Toxicity
Oxidative Stress
DNA damage
Inflammation
ER Stress
Metal Stress
Osmotic Stress
Heat Shock
Hypoxia
Cell Health

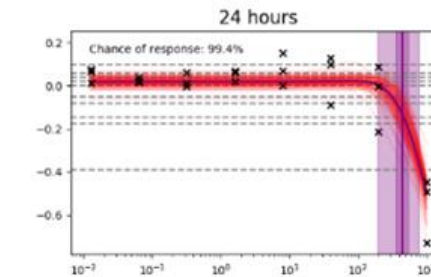
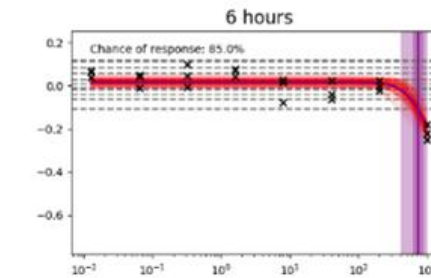
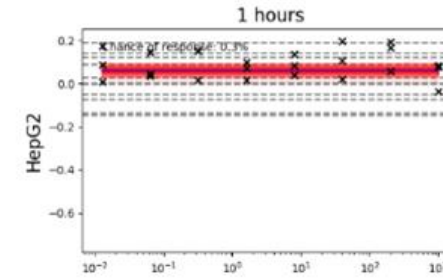


*now conducted in HepaRG spheroids

In Vitro Bioactivity: Cell Stress Panel



Compound: Coumarin Assay: Cellular ATP Reference: any



High-Throughput Transcriptomics Gene Expression Profiling (HTTr)

1. Defining a safe operating exposure for systemic toxicity using a **NOTEL** (No Transcriptional Effect Level)
2. Defining compound similarity grouping (Read Across)

NOTEL is the derived concentration of a compound that does not elicit a meaningful change in gene expression (i.e. the threshold of the concentration that elicits minimal mechanistic activity)

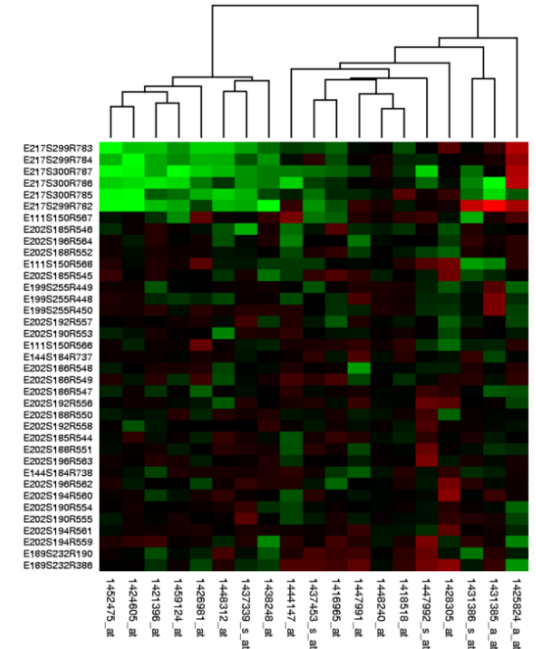
Cell lines (chosen to express a range of relevant receptors)

MCF-7 – human breast adenocarcinoma cell line

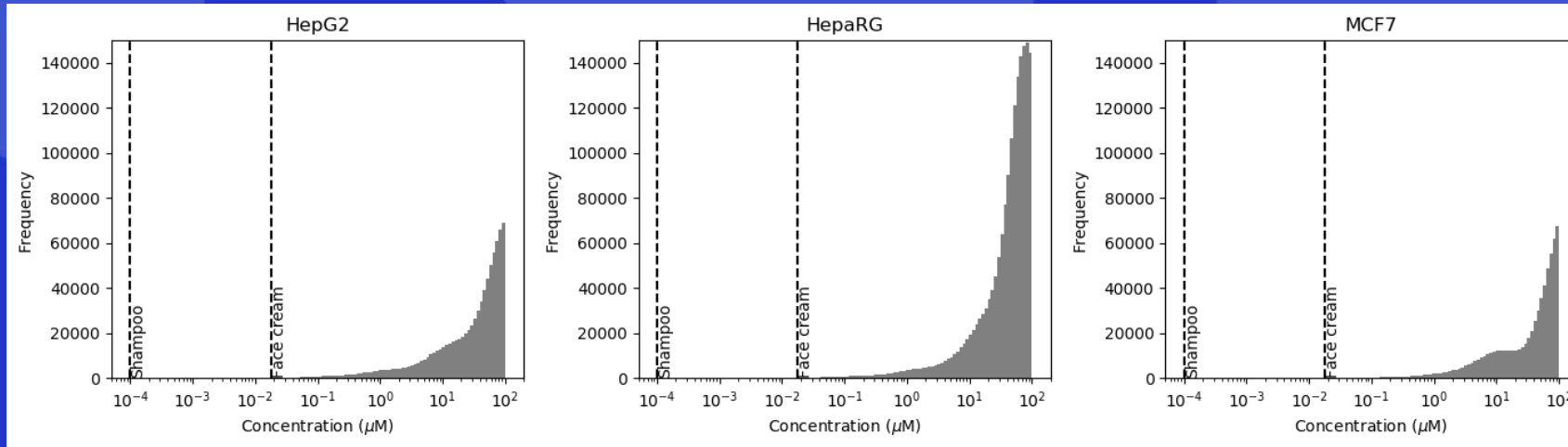
HepG2 – human liver carcinoma

HepaRG – terminally differentiated hepatic cells that retain many characteristics of primary human hepatocytes + as spheroids

N-HEK – primary normal human epidermal keratinocytes



In Vitro Bioactivity: Tempo-Seq Technology



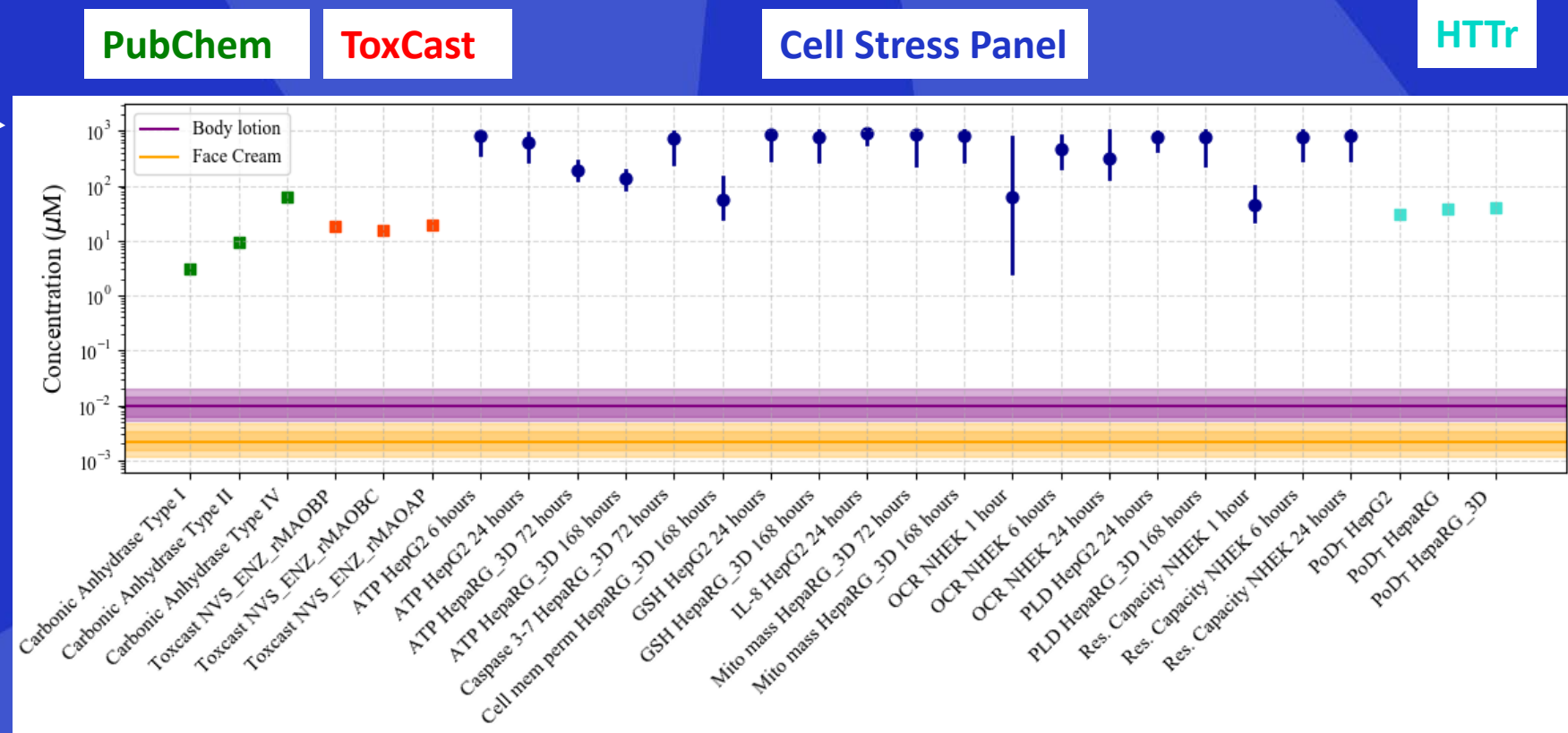
- Coumarin dose range 0.001 µM to 100 µM
- 24 hour time point
- QC and normalisation in DESeq2
- BMDExpress2 applied to determine NOTEL (3 pathway approaches)

Cell Model	HepG2	MCF7	HepaRG 2D
Pathway Level Tests	(308 pathways)	(0 pathways)	(17 pathways)
20 pathways with the lowest pvalue Reactome	70	NA	58*
20 pathways with the lowest BMD Reactome	44	NA	58*
BMD of Reactome pathway with lowest BMD that meets significance threshold criteria	31	NA	38
Gene Level Tests	(1570 genes)	(47 genes)	(87 genes)
Mean BMD of 20 genes with largest fold change	6	3	54
Mean BMD of Genes between 25th and 75th percentile	17	1	59

Margin of Safety considering PODs and Exposure

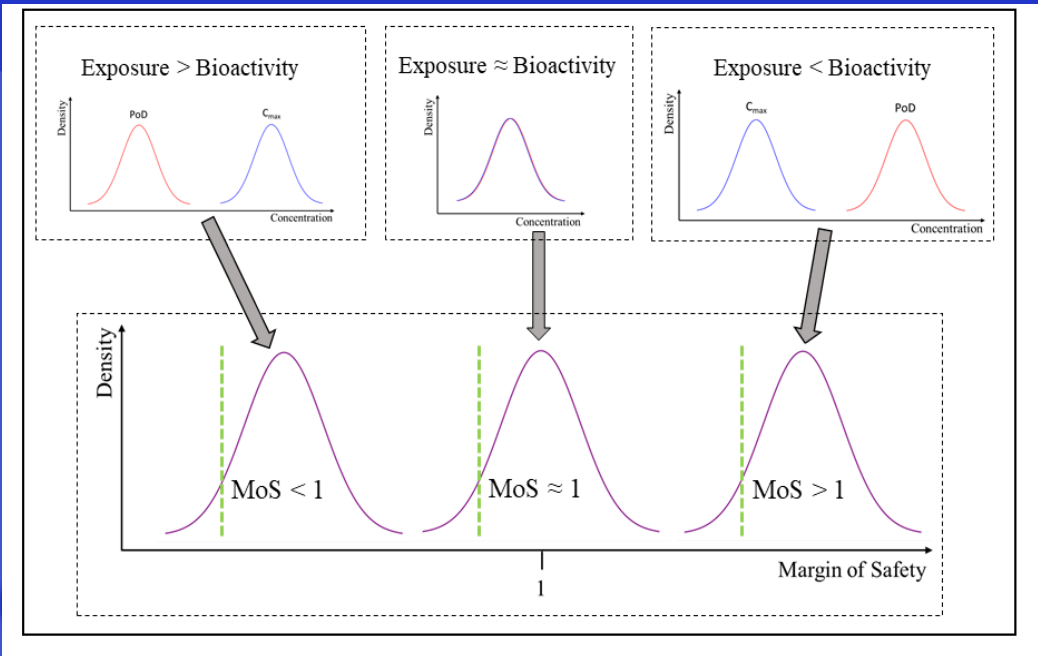
PoDs and plasma C_{max} (μM) are expressed as total concentration

- C_{max} expressed as a distribution:
- Line = median (50th percentile)
 - Inner band = 25th-75th percentile
 - Outer band = 2.5th-97.5th percentile (95th credible interval)



Application of *Ab Initio* Approach: Risk Assessment (NGRA)

Margin of safety is the fold difference between the C_{max} and the *in vitro* POD



Technology	Cell line/ Enzyme/Biomarker	Face cream Min. 5th percentile MoS	Body Lotion Min. 5th percentile MoS
Cell stress panel	HepG2 (ATP, 24h)	96738	22048
Cell stress panel	NHEK (OCR 1h)	1330	295
HTTr	HepG2 (24h)	7223	1618
HTTr	HepaRG (24h)	8864	1986
Toxcast	MAO B (rat bain)	3711	831
PubChem	Carbonic Anhydrase Type I	706	158
PubChem	Carbonic Anhydrase Type II	2140	479
PubChem	Carbonic Anhydrase Type VI	14652	3282
Cell stress panel	HepaRG_3D (cell mem perm 168h)	9601	2197
HTTr	HepaRG_3D_24h	9538	2137

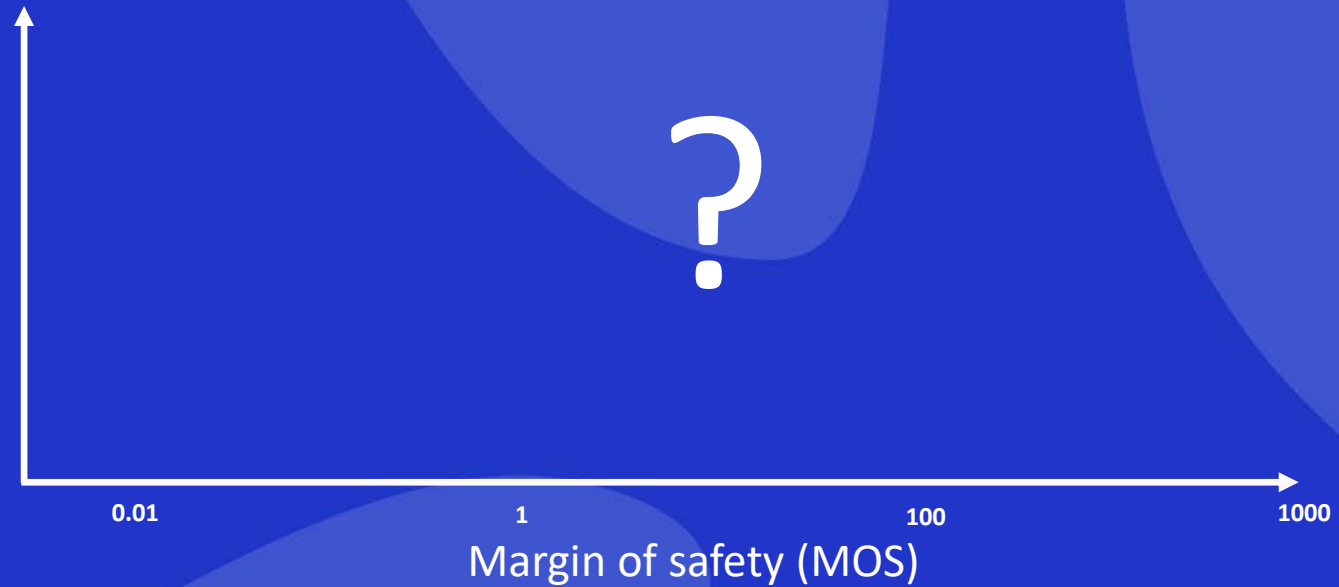
Challenges to overcome

- **Clarity on the level of protection offered by this approach**
 - **Bioactivity vs. Adversity**
- **Adequacy of cell lines, timepoints, study designs**
- **Role of metabolism**
- **Translating principles to other sectors/chemistries**
 - **Regulation keeping pace with science**

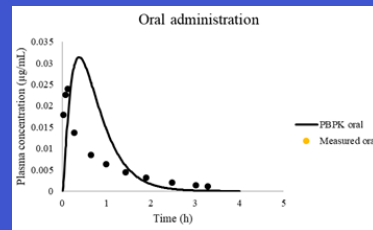
Evaluating the level of protection

Chemical exposures scenarios

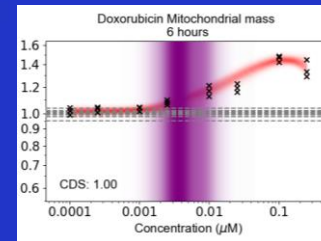
- 'Low' risk (from consumer goods perspective) – e.g. foods, cosmetics
- 'High' risk (from consumer goods perspective) – e.g. drugs



Define typical use-case scenarios benchmark chemical-exposures



PBK models of systemic exposure





Calculate the PoDs

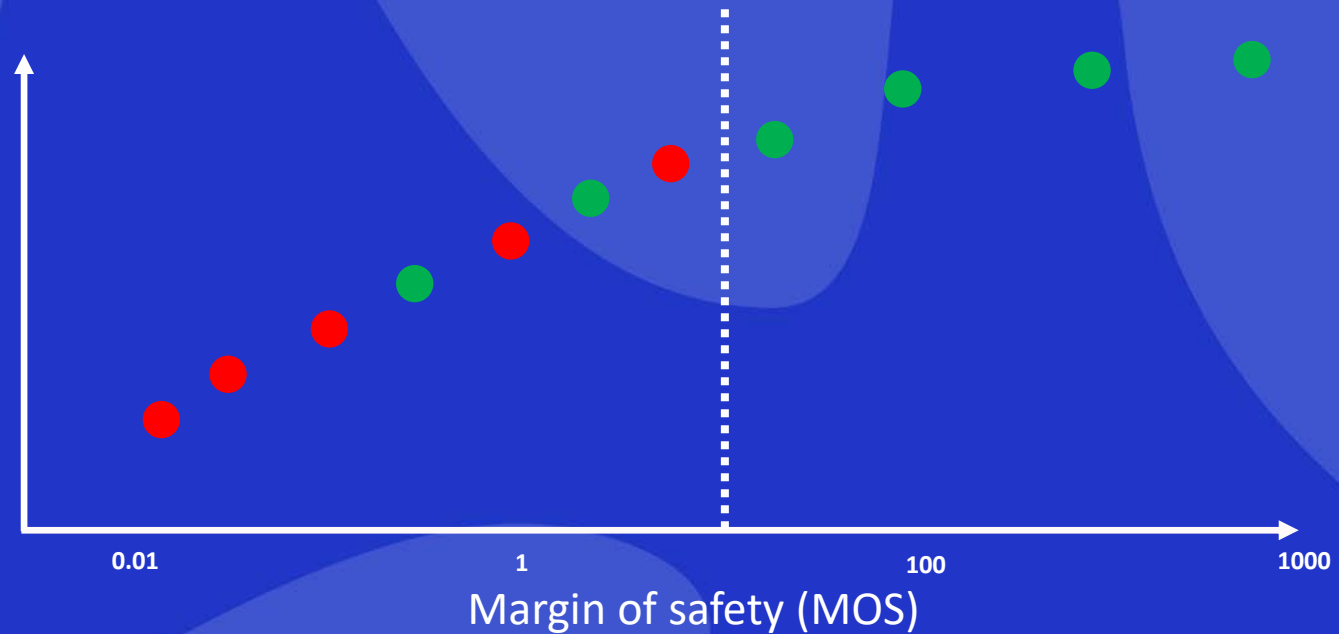


Calculate margin of safety

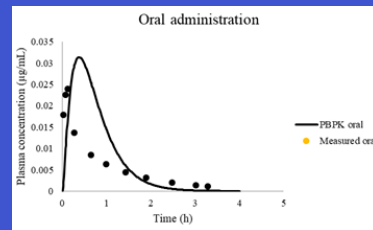
Evaluating the level of protection

Chemical exposures scenarios

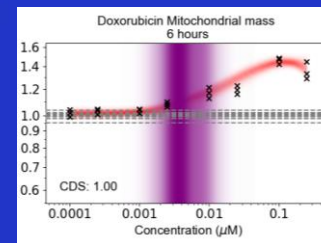
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Define typical use-case scenarios benchmark chemical-exposures



PBK models of systemic exposure



Calculate the PoDs



Calculate margin of safety

Translation into global requirements

- **Once we understand the level of protection and where the approach falls down we can consider translation into requirements**
 - **Bioactivity/Exposure screen instead of arbitrary tonnage-driven information requirements**
 - **Beyond cosmetics**

Conclusions

- **We are seeing increased pace of development and application of next generation risk assessments in the consumer products industry**
- **NGRA is exposure-led, hypothesis driven, and requires clear articulation of the risk assessment question**
- **Progress has been possible with a change in mindset (protection not prediction)**
- **Once we understand the strengths and limitations why shouldn't the same approach be useful in different contexts?**

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Ruth Pendlington
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Georgia Reynolds
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Nikol Simecek
Andy Scott
Carl Westmoreland
Andy White



Unilever

