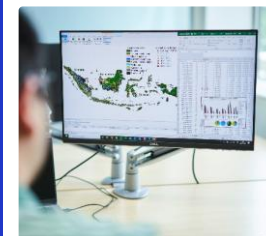
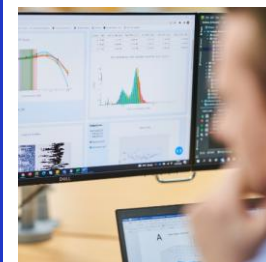


SARA-ICE: A Self-contained Model for Predicting a Human Relevant Point-of-Departure for Skin Sensitization

Georgia Reynolds

EUROTOX 2025

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Safety, Environmental
& Regulatory Science



SARA-ICE, a Bayesian probabilistic model for skin allergy risk assessment

Database

The core dataset underpinning the model uses data in the NICEATM ICE database.

434 chemicals

1,407 *in vivo* studies

2,575 *in vitro* studies

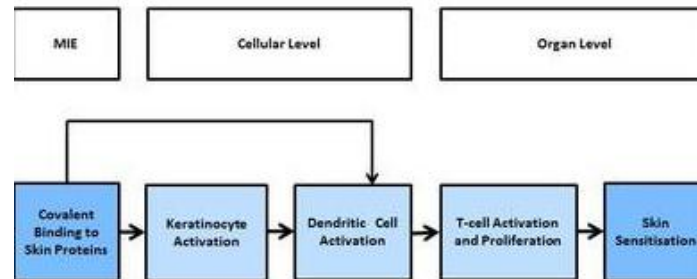


Integrated
Chemical
Environment

Input Assay Types

OECD TG NAM Assays aligned to key events in the skin allergy AOP.

- DPRA, kDPRA (KE1)
- KeratinoSens (KE2)
- U-Sens, hCLAT (KE3)
- Human (HMT/HRIPT) & LLNA studies may also be used.



Model Outputs

SARA-ICE calculates a continuous measure of sensitiser potency. ED_{01} (1% sensitising dose in human patch test).

- A PoD (SARA-ICE DA)
- Or
- GHS Classification (SARA-ICE Extended)

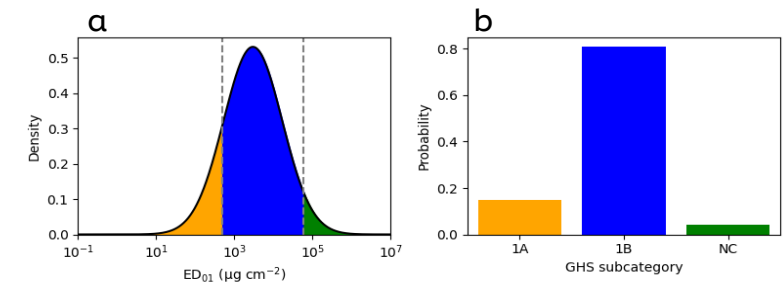
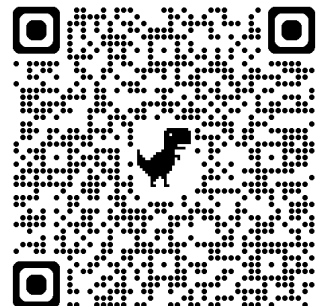


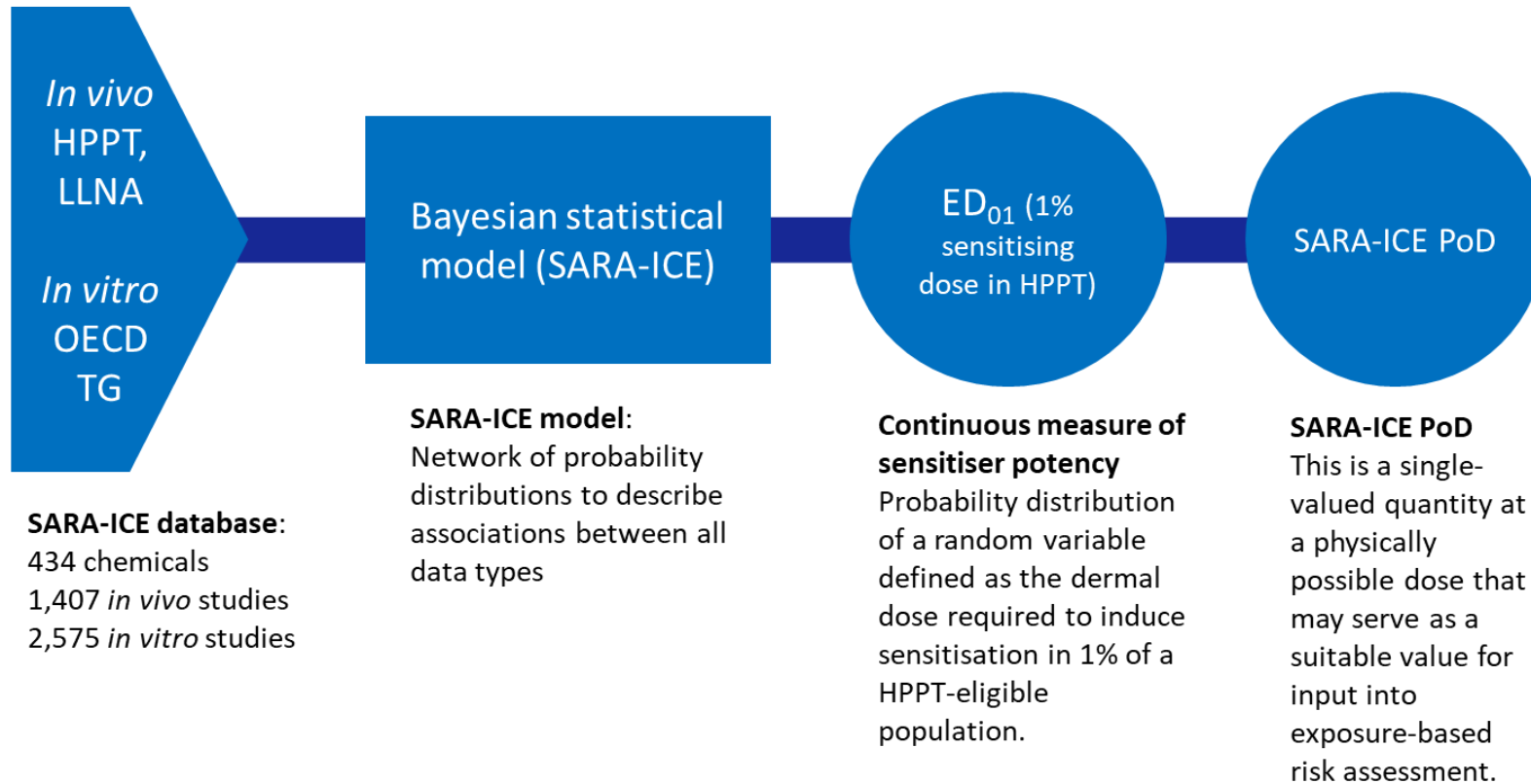
Figure (a) Example estimate of ED_{01} distribution with overlay of GHS subcategories 1A, 1B and NC defined thresholds, (b) probability of each GHS subcategory from ED_{01} distribution

OECD Defined Approaches (DAs) for Skin Sensitisation (GL 497)

- In 2021, OECD Test Guideline 497 was adopted, meeting regulatory requirements for:
 - DAs that discriminate between sensitizers and non-sensitizers
 - DAs that discriminate strong from weak/moderate sensitizers (i.e., GHS potency categories)
 - In 2021, the US and UK began a joint led feasibility study project under OECD for **evaluating a defined approach** that can provide a **point of departure** for quantitative risk assessment
 - In 2024, the project began drafting an update to OECD TG 497 to incorporate DAs for PoD determination
- **In June 2025, an update to [OECD GL 497](#), including SARA-ICE DA, was published.**

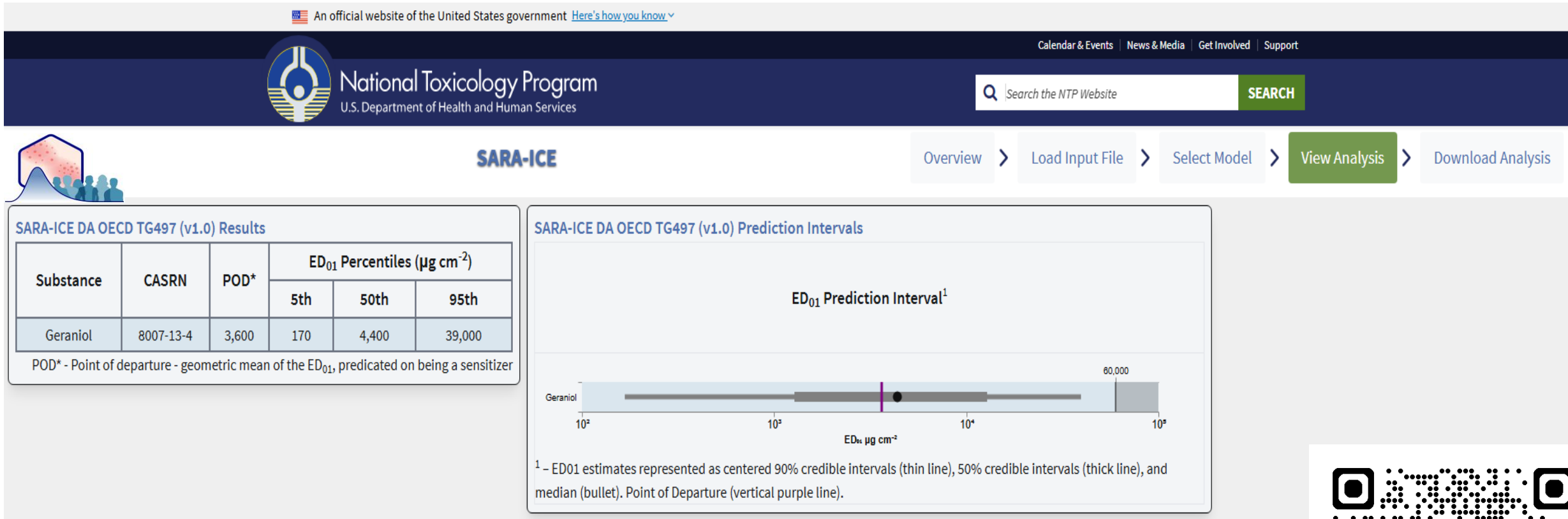


SARA-ICE DA (OECD GL 497)

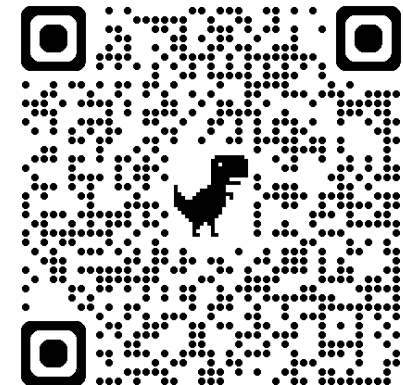


Assay	HPPT	LLNA	DPRA	kDPRA	KeratinoSens	h-CLAT	U-Sens
Inputs into SARA-ICE	Dermal dose # tested # sensitised	EC₃ or max. cx. tested if no response	% depletion of cys and lys peptide	Log Kmax	EC_{1.5} or max. cx. tested IC50 or max. cx. tested	CD86 EC₁₅₀ , CD50 EC₂₀₀ or max. cx. tested CV₇₅ or max. cx. tested	CD86 EC₁₅₀ or max. cx. tested CV₇₅ or max. cx. tested

SARA-ICE DA User Interface



The SARA-ICE Model User Interface (for OECD 496 DA and Extended versions) is available on the NTP Website.



SARA-ICE NAM PoD: Application in Risk Assessment

Acceptable Margin of Exposure (acceptable MoE) = a value above which a risk assessor may usually conclude low risk for their safety assessment.

We have developed an approach to define NAM PoD equivalent acceptable MoEs so that SARA-ICE PoDs can be applied in current risk assessment methodologies such as QRA.

Published in the **ICCS Best Practise Guidance 2025**.

Table 11. Side by Side Comparison of the Acceptable MoE from a Traditional NESIL-Based Risk Assessment to that for PoD_{NAM} from SARA-ICE

Acceptable MoE for traditional, NESIL-based risk assessment	Median of the distribution for the acceptable MoE for SARA-ICE PoDs
3	3
10	10
30	30
100	100
300	360
1,000	1,700

Source: Reynolds et al. 2025

Box 8. Example Safety Assessment Using PoD_{NAM} and NAM Acceptable MoE:

Scenario: 0.02% of 'Substance X' in a deodorant

Exposure: CEL = 5 µg/cm²

PoD_{NAM}: = 4800 µg/cm² (derived using SARA-ICE DA)

$$MoE = \frac{4800}{5} = 960$$

Acceptable MoE = 360 (translated from a traditional Acceptable MoE of 300 for products applied to the underarm (Appendix B. Historically applied Safety Assessment Factors (SAFs) to a NAM Acceptable MoE using Reynolds et al., 2025 as in Table 11)

Safety Assessment Conclusion: No appreciable risk; MoE of 960 > Acceptable MoE of 360

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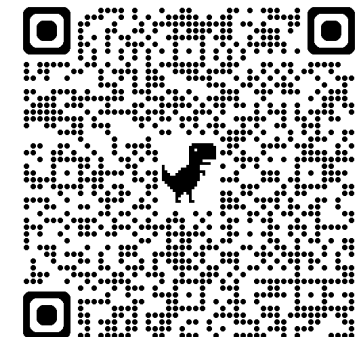
Best Practice Guidance Document

*Skin Sensitization Assessment:
Using New Approach Methods for Substances
in Cosmetics and Personal Care Products*



July 21, 2025

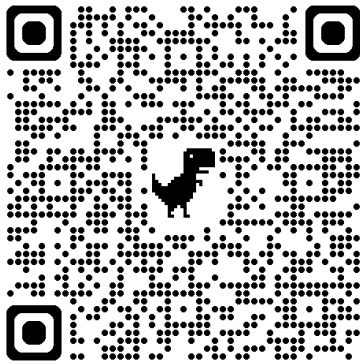
ICCS



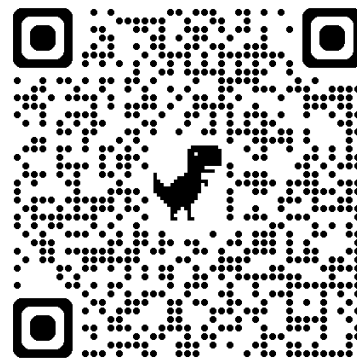
Summary

- SARA-ICE DA fulfils a gap in the current OECD TG 497 on defining a PoD for risk assessment
- SARA-ICE allows flexible use of a range of OECD TG NAMs (as well as historical LLNA/Human data)
- SARA-ICE NAM PoDs can be applied in current skin sensitisation risk assessment methods by applying calculated acceptable MoEs, replacing traditional SAFs

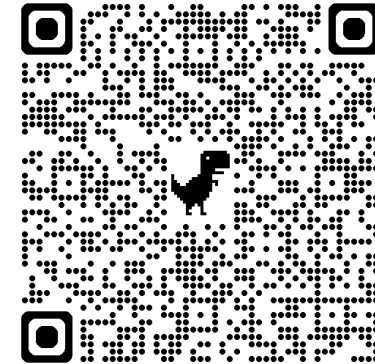
OECD GL 497



SARA-ICE User Interface



ICCS BPG



Thank You



SERS

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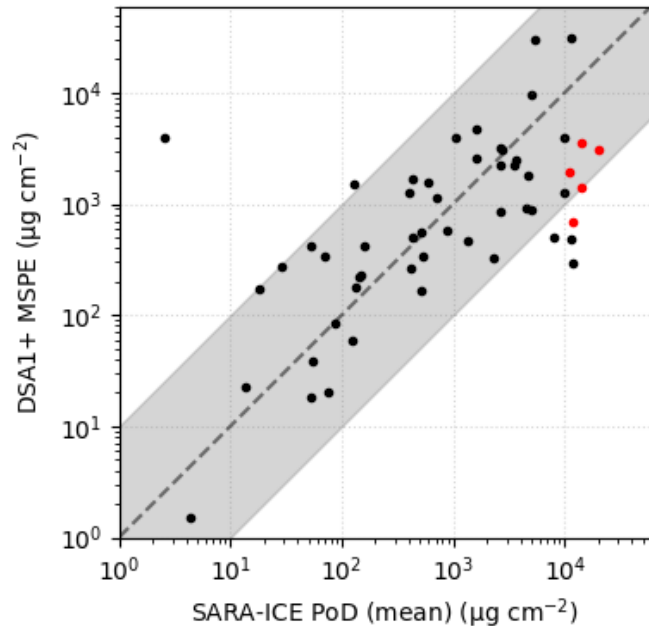
The NICEATM Group

Back up slides

Evaluation of the SARA-ICE PoD

SARA-ICE vs reference DSA1+

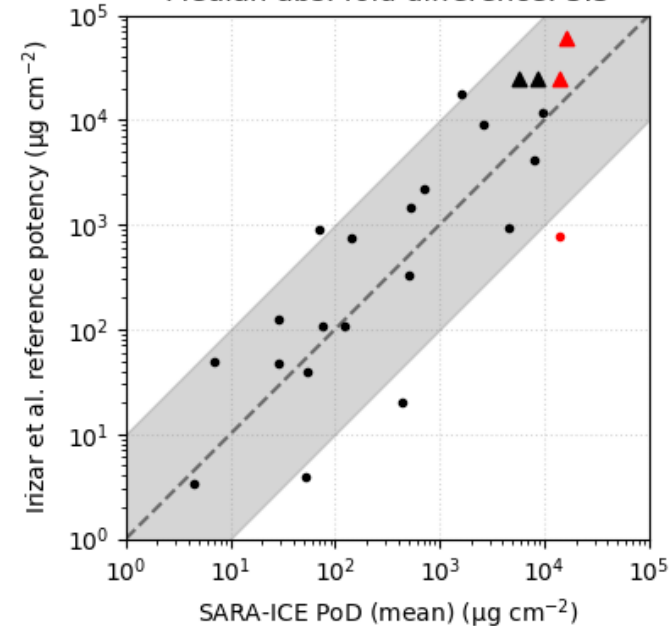
Pearson correlation: 0.64 (n=54)
 Geo. mean fold difference: 1.2
 Median fold difference: 1.3
 Geo. mean abs. fold difference: 3.7
 Median abs. fold difference: 2.9



SARA-ICE mean PoDs (from NAM data) relatively unbiased relative to reference DSA1+.
 PoDs on average around 3-fold away.

SARA-ICE PoDs vs Irizar et al. benchmarks

Pearson correlation: 0.84 (n=24)
 Geo. mean fold difference: 0.75
 Median fold difference: 0.58
 Geo. mean abs. fold difference: 3.6
 Median abs. fold difference: 3.3



SARA-ICE mean PoDs (from NAM data) relatively unbiased relative to Irizar et al. reference potency.
 PoDs on average around 3.5-fold away.

SARA-ICE DA (Extended Version)

Input



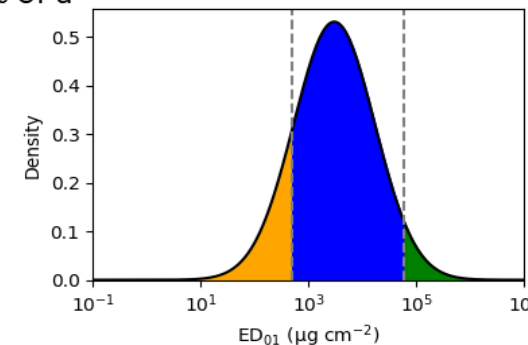
SARA-ICE database:
434 chemicals
1,407 *in vivo* studies
2,575 *in vitro* studies

Bayesian statistical
model (SARA-ICE)

SARA-ICE model:
Network of probability
distributions to describe
associations between all
data types

ED₀₁ (1%
sensitising
dose in HPPT)

**Continuous measure of
sensitiser potency**
Probability distribution
of a random variable
defined as the dermal
dose required to induce
sensitisation in 1% of a
HPPT-eligible
population.



GHS classification thresholds:
Threshold 1A/1B: 500 $\mu\text{g cm}^{-2}$
Thresholds 1B/NC: 60,000 $\mu\text{g cm}^{-2}$

GHS
classification
probabilities

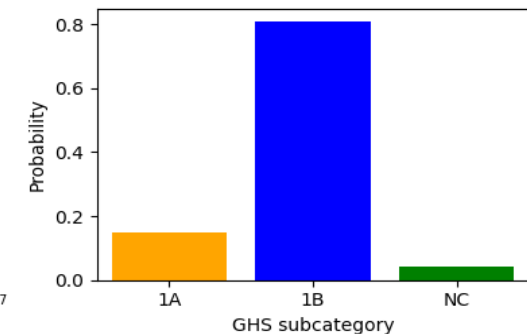
**Categorical measure of
sensitiser potency**
Probability that
chemical potency
should be categorised as
GHS 1A, 1B or NC.

Decision model:

Call 1 if $P(1) > \theta_{\text{bin}}$
Call NC if $P(\text{NC}) > \theta_{\text{bin}}$
Call 1A if $P(1A | 1) > \theta_{\text{sub}}$
Call 1B if $P(1B | 1) > \theta_{\text{sub}}$

GHS
classification
decision
model

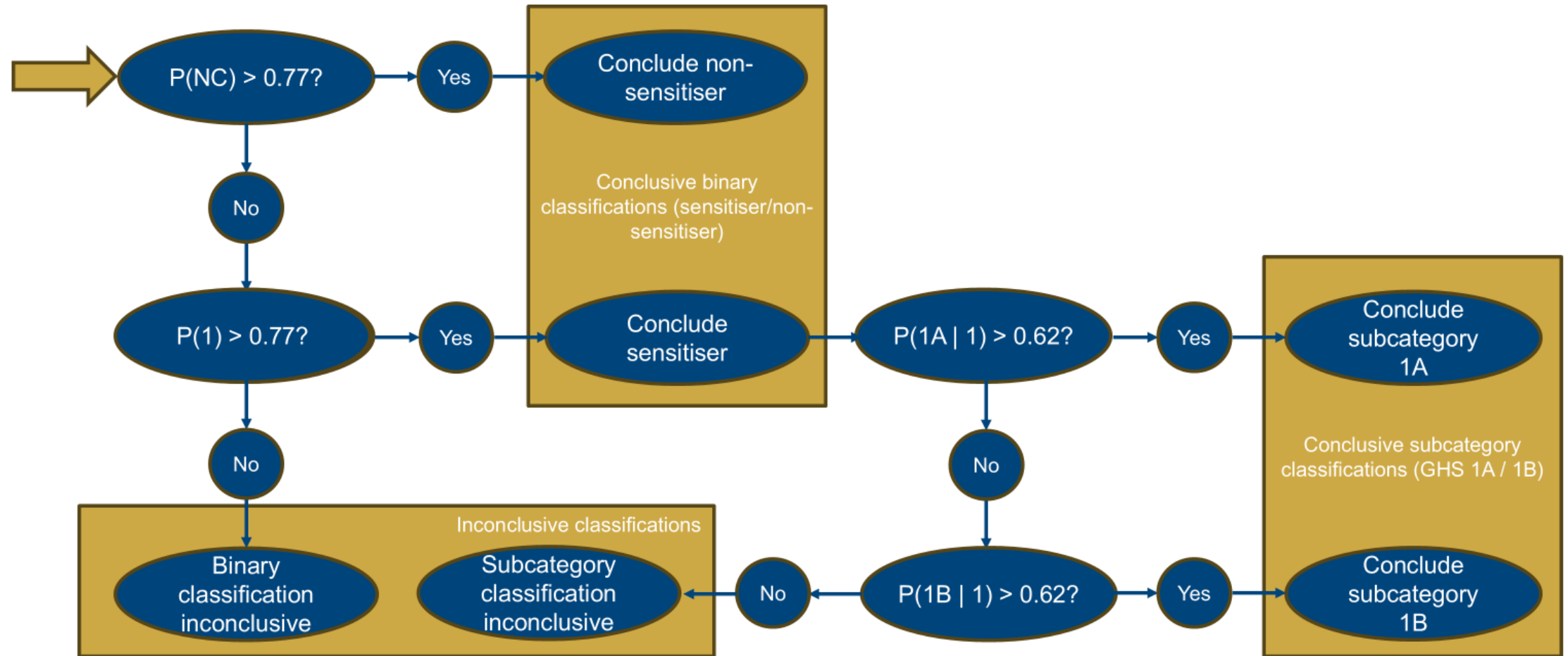
GHS classification
GHS call if probability
passes thresholds
chosen within the
decision model



θ_{bin} = selected probability threshold for making a binary classification (1/NC)

θ_{sub} = selected threshold for making a sub-classification of 1A of 1B, contingent on class 1 being true

GHS Classification Decision Model (SARA-ICE Extended)



SARA-ICE NAM vs OECD DASS benchmarks

The SARA-ICE decision model has been evaluated against OECD benchmark classifications.


Binary classifications

Human, $\Theta_{bin} = 0.77$	SARA-ICE 1	SARA-ICE NC	Inconclusive	Total
Reference 1	37	5	13	55
Reference NC	0	5	6	11
Total	37	10	19	66
Sensitivity: 88% Specificity: 100% Balanced accuracy: 94% Inconclusive rate on reference class 1: 24% Inconclusive rate on reference class NC: 55%				
LLNA, $\Theta_{bin} = 0.77$	SARA-ICE 1	SARA-ICE NC	Inconclusive	Total
Reference 1	89	9	37	135
Reference NC	2	19	12	33
Total	91	28	49	168
Sensitivity: 91% Specificity: 90% Balanced accuracy: 91% Inconclusive rate on reference class 1: 27% Inconclusive rate on reference class NC: 36%				

Subcategory classifications

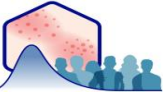
Human, $\Theta_{bin} = 0.77, \Theta_{sub} = 0.62$	SARA 1A	SARA 1B	SARA NC	Inconclusive	Total
Reference 1A	14	2	0	5	21
Reference 1B	3	7	5	16	31
Reference NC	0	0	5	6	11
Total	17	9	10	27	63
Sensitivity 1A: 88%, Specificity 1A: 85%, Balanced accuracy 1A: 86% Sensitivity 1B: 47%, Specificity 1B: 90%, Balanced accuracy 1B: 69% Sensitivity NC: 100%, Specificity NC: 84%, Balanced accuracy NC: 92% Average balanced accuracy: 82% Inconclusive rate on reference class 1A: 24% Inconclusive rate on reference class 1B: 52% Inconclusive rate on reference class NC: 55%					
LLNA, $\Theta_{bin} = 0.77, \Theta_{sub} = 0.62$	SARA 1A	SARA 1B	SARA NC	Inconclusive	Total
Reference 1A	27	3	0	8	38
Reference 1B	12	22	8	43	85
Reference NC	0	1	19	13	33
Total	39	26	27	64	156
Sensitivity 1A: 90%, Specificity 1A: 81%, Balanced accuracy 1A: 85% Sensitivity 1B: 52%, Specificity 1B: 92%, Balanced accuracy 1B: 72% Sensitivity NC: 95%, Specificity NC: 89%, Balanced accuracy NC: 92% Average balanced accuracy: 83% Inconclusive rate on reference class 1A: 21% Inconclusive rate on reference class 1B: 51% Inconclusive rate on reference class NC: 39%					

SARA-ICE DA (Extended Version)


National Toxicology Program
 U.S. Department of Health and Human Services

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SEARCH


SARA-ICE

[Overview](#) > [Load Input File](#) > [Select Model](#) > [View Analysis](#) > [Download Analysis](#)

GHS Thresholds

Users can select Probability Thresholds for GHS Call for their own individual use requirements. Sliders are restricted to minimum allowable thresholds for predicting hazard or sub-category as defined in the evaluation found in [Reinke et al., 2025](#). Evaluation of categorization performance was carried out using thresholds of 0.77 (hazard) and 0.62 (sub-category), as described in [Supplementary Data 2: Performance of SARA-ICE against OECD benchmark GHS dataset](#).

GHS Hazard Probability Threshold
Category 1 vs Not Categorized (NC)
Minimum: 0.67

Slider: 0.77

GHS Sub-Cat Probability Threshold
1A vs 1B (assuming Category 1)
Minimum: 0.5

Slider: 0.62

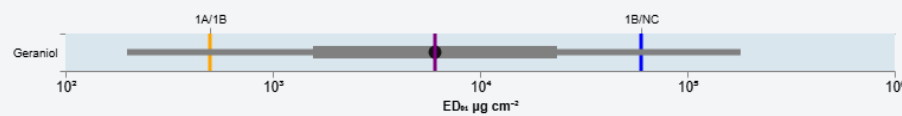
SARA-ICE Extended Model (v1.0) Results

Substance	CASRN	Mean ¹	SPUR ²	ED ₀₁ Percentiles (μg cm ⁻²)			SARA-ICE Probability GHS Subcategory				GHS Call
				5th	50th	95th	1A	1B	1	NC	
Geraniol	8007-13-4	6,100	30	200	6,000	>60,000	0.11	0.76	0.87	0.13	1B

Mean¹ – Geometric Mean of the ED₀₁ distribution
 SPUR² – (SARA-ICE Prediction Uncertainty Ratio) fold-difference between the median (50th percentile) and the 5th percentile

SARA-ICE Extended Model (v1.0) Prediction Intervals

ED₀₁ Prediction Interval¹



¹ – ED₀₁ estimates represented as centered 90% credible intervals (thin line), 50% credible intervals (thick line), and median (bullet). Geometric Mean (vertical purple line).

Application of the SARA-ICE Models

Example Case Study: Geraniol

- Using NAM data only, generate a PoD (SARA-ICE DA) and GHS Classification (SARA-ICE Extended)

SARA-ICE Input Data:

Substance Name	CASRN	MW (g/mol)
Geraniol	8007-13-4	154.25

DPRA	
Depletion Cys (%)	Depletion Lys (%)
12.3	2.6

kDPRA
log Kmax (M ⁻¹ s ⁻¹)
-3.4

KeratinoSens
EC1.5 (uM)
209.8

hCLAT	
CD54, EC200 (ug/ml)	CD86, EC150 (ug/ml)
>168	123

USENS
CD86, EC150 (ug/ml)
53.6