

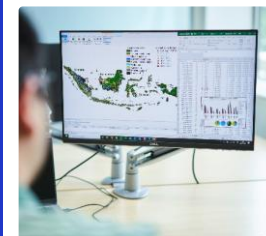
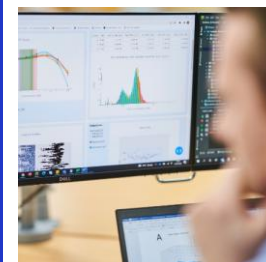
# **A non-animal toolbox in NGRA for inhalation safety: applicability of NAMs informed by AOPs associated with pulmonary toxicity**

**NGRA 中的吸入安全性的非动物工具箱：基于AOP的肺毒性  
NAM 的可用性**

**Jin Li, PhD**

**李津**

**SERS**  
Safety, Environmental  
& Regulatory Science



# Assuring inhalation safety: inhalation exposure depends on product type and habits & practices

**Several Unilever products lead to an unintentional inhalation exposure :**  
**Can we safely use x% of ingredient y in product z ?**



**Household cleaning  
products**



**Hairsprays  
(pump and aerosol)**



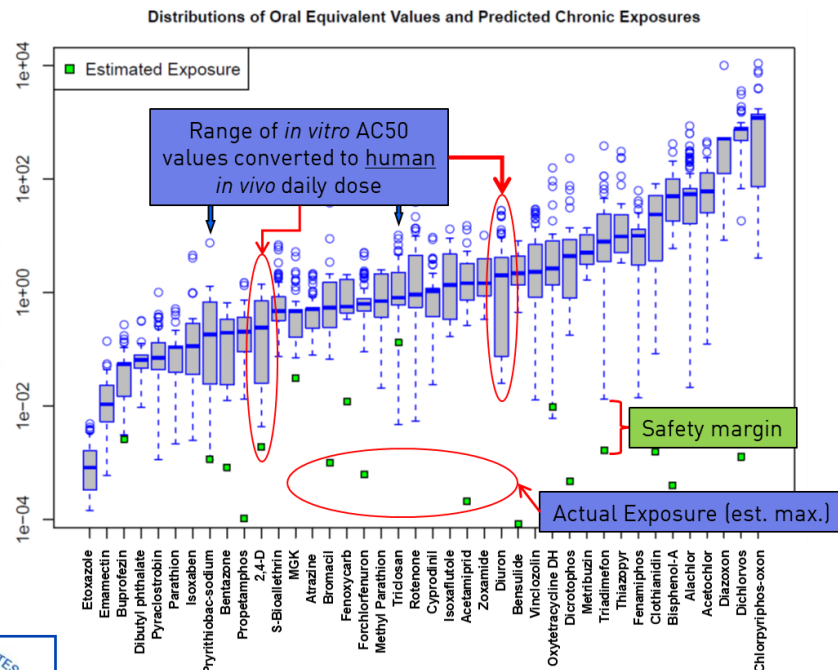
**Shampoos**



**Anti-perspirant/  
deodorant aerosols**

# Safety without animal testing - 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*



Slide from Dr Rusty Thomas,  
EPA, with thanks

Rotroff, et al. Tox.Sci 2010  
DOI:10.1093/toxsci/kfq220



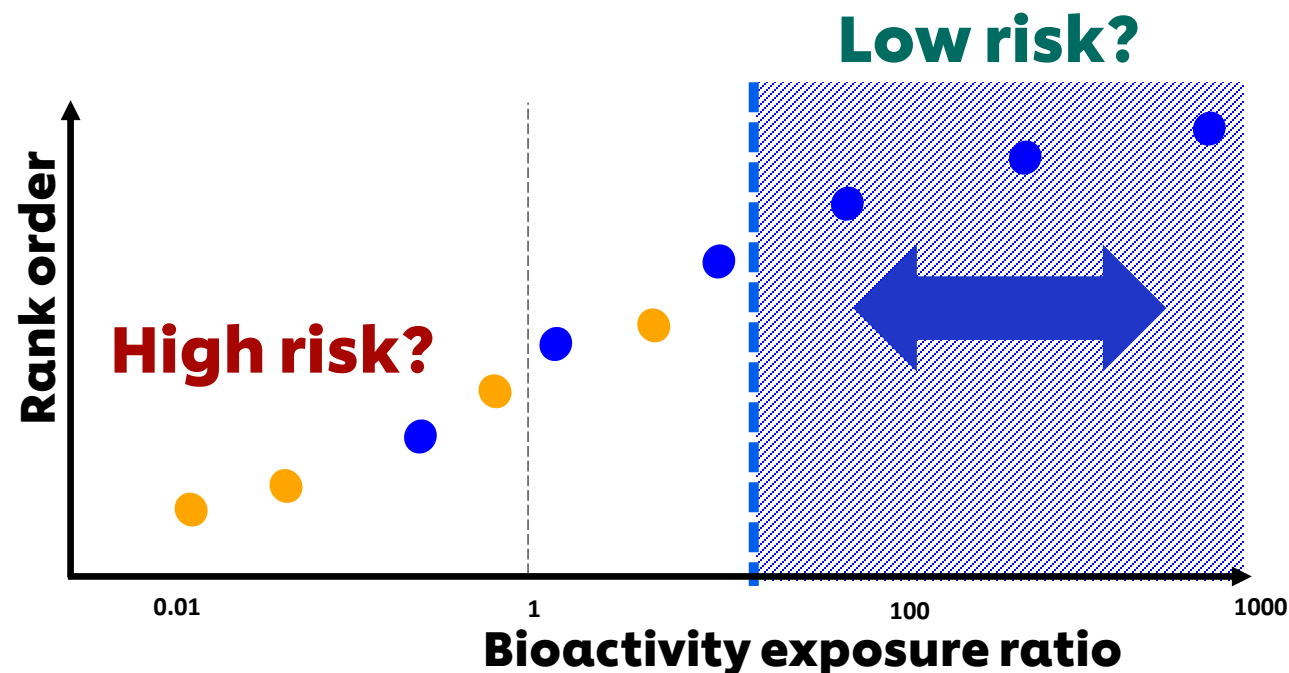
The hypothesis underpinning this type of NGRA is that **if there is no bioactivity observed at consumer-relevant concentrations, there can be no adverse health effects.**

# Unilever: Testing the Performance of NAMs in an NGRA

## 联合利华：在 NGRA 中测试 NAM 的标准

### Benchmarking using chemical-exposure scenarios

- Chemicals with well-defined human exposures
- Traditional safety assessment available
- High certainty in the risk classification for each chemical-exposure scenario from a consumer goods perspective
- Risk class is relative to consumer health (N.B. drugs = high-risk)



'Low' risk for consumers from systemic perspective



'High' risk for consumers from systemic perspective

#### Protectiveness

How many of the high-risk exposure scenarios are identified as uncertain/high risk?

(i.e.  $BER < \text{threshold}$ )

有多少高风险暴露情景被确定为不确定/高风险?  
(即  $BER < \text{阈值}$ )

#### Utility

How many of the low-risk scenarios are identified as low-risk at this early tier stage in a risk assessment framework?

(i.e.  $BER > \text{threshold}$ )

在风险评估框架的早期阶段，有多少低风险情景被确定为低风险？  
(即  $BER > \text{阈值}$ )

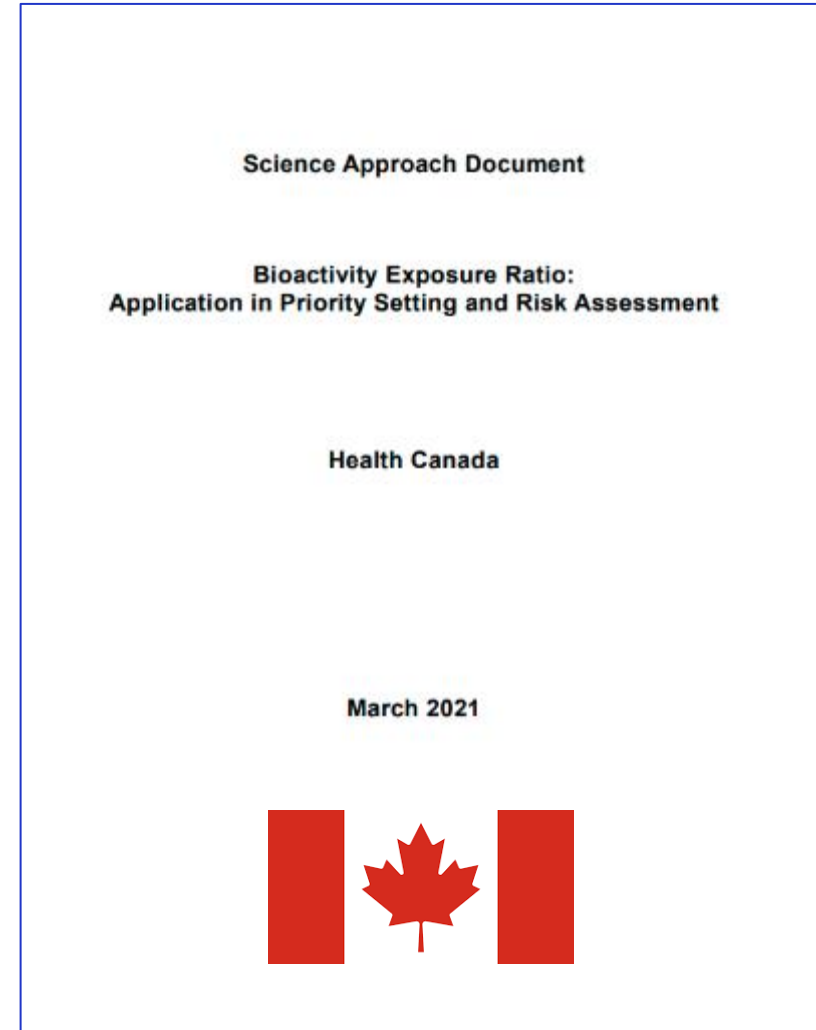
# Bioactivity: Exposure Ratio (BER) 生物活性：暴露比率(BER)

## POD from *in vitro* Bioactivity Assays 体外生物活性测定中的 POD

## Systemic exposure in humans (from PBK) 人体全身暴露（来自 PBK模型）

‘Bioactivity exposure ratios (BERs). BERs are analogous to the traditional margin of exposure used in risk assessment in that chemicals with a lower BER possess a higher potential for risk’  
生物活性：暴露比率 BERs 类似于风险评估中使用的传统暴露边际，BER 较低的化学品具有较高的潜在风险

Kuo et al (2022)



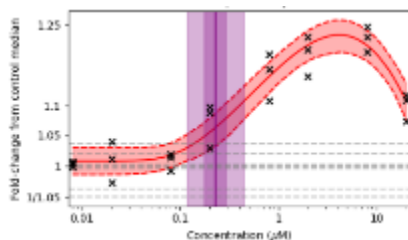
[Science approach document - Bioactivity exposure ratio: Application in priority setting and risk assessment - Canada.ca](#)

科学方法文献 - 生物活性:暴露比：在优先级设定和风险评估中的应用 - **Canada.ca**



# Our approach NGRA in action for systemic toxicity

**Point of departure (POD) derived from concentration-response data**



**Systemic toolbox of assays (NAMs) which cover a broad biological space – measurements of bioactivity**

**Cellular stress assays**

**Transcriptomics**

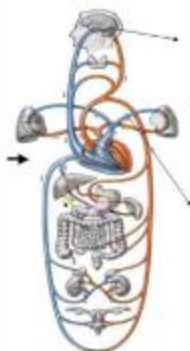
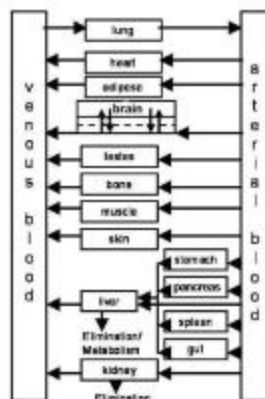
**Receptor binding/enzymatic assays**

**Others**

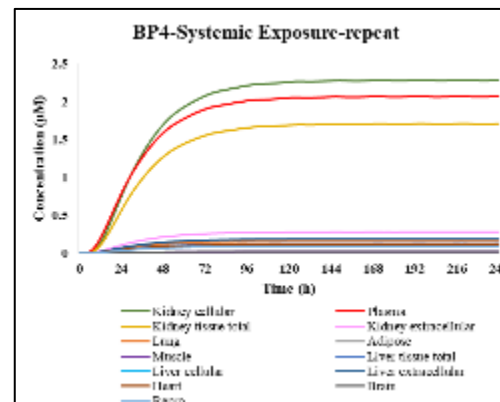
**Exposure models (PBK, free/total concentration)**



**Skin pen**



**Exposure estimation: Plasma  $C_{max}$ , organ distribution, AUC**



**Calculation of Bioactivity exposure ratio (BER)**

**The BER is defined as the ratio between the POD and the relevant exposure metric**

# 活性：暴露比率(BER) / 评估结果

生物活性

In vitro pharmacological profiling

~79 targets

High-Throughput transcriptomics (HTTr)

- TempO-seek technology – full gene panel
- 24hr exposure
- 7 concentrations
- Various cell models (e.g. HepG2, MCF7, HepaRG)
- Dose-response analysis using BMDExpress2 and BIFROST model

Reynolds et al. 2020, Comp Tox 16: 100116  
Baltazar et al. 2020, Toxicol Sci 175(1): 226–252

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)

暴露

面霜

Time (Days)

润肤化妆水

Time (Days)

Coumarin

Time (Days)

确定最低（最敏感）出发点，以  $\mu\text{M}$  表示

确定以  $\mu\text{M}$  表示的现实最坏情况血浆暴露量 ( $C_{\text{max}}$ )

生物活性暴露率 =  $\frac{\text{生物活性}}{\text{暴露}}$

BER 越大，暴露于消费者身体发生毒性的风险就越低



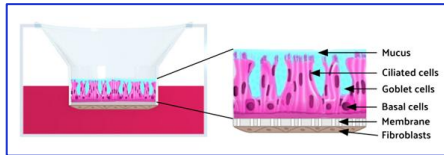
# Human-relevant strategy for selecting NAMs for lung toxicity NGRA

**Broad coverage of bioactivity readouts relevant to inhalation hazards which can provide *in vitro* PoDs**

	Effects	Readouts	Acute toxicity	Chronic effect
Upper respiratory tract MucilAir™-HF model	Tissue functionality changes	Mucus secretion, cilia beating (CBF), mucociliary clearance (MCC)	Irritation, enhanced chance of airway infection	Goblet cell hyperplasia, asthma, chronic obstructive pulmonary disease (COPD)
	Cytotoxicity, barrier integrity, inflammatory modulation	Trans-epithelial electrical resistance (TEER), cytokine/ chemokine modulation	Local cytotoxicity, irritation, inflammation	Airway remodelling, Asthma, COPD, lung fibrosis
Lower respiratory tract EpiAlveolar™ model	Barrier integrity, inflammatory and transcriptomic modulation	TEER, cytokine/ chemokine modulation, transcriptomics analysis	Local cytotoxicity, inflammation, wound healing	Airway remodelling/ scarring, lung fibrosis

## Upper respiratory tract: MucilAir™-HF

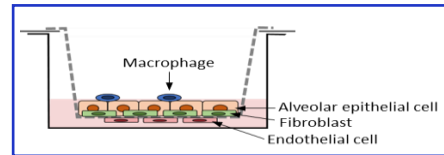
→ impairment of mucociliary clearance (MCC)  
(AOP148)



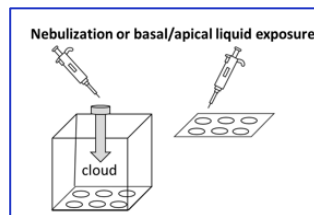
Reconstituted cells system using human primary bronchial cell cocultured with human airway fibroblast.

## Lower respiratory tract: EpiAlveolar™

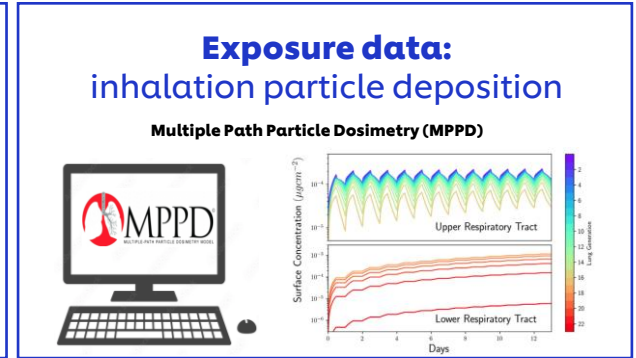
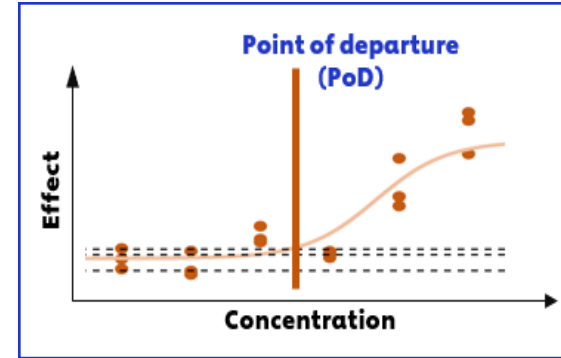
→ Lung inflammation and fibrosis  
(AOP 173)



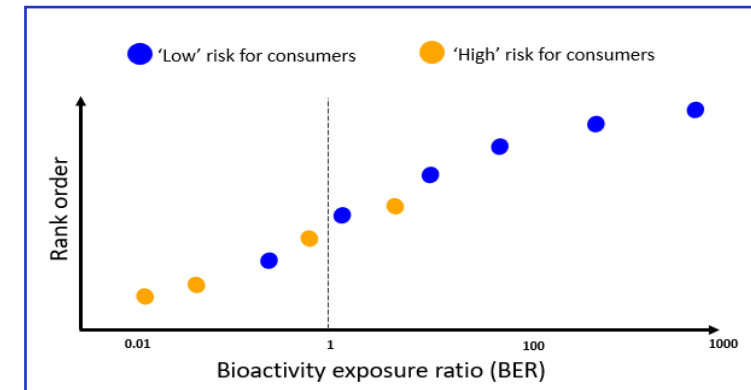
Primary human alveolar epithelial cells, pulmonary endothelial cells and monocyte-derived macrophages



12-day exposure scheme for both tissue models:

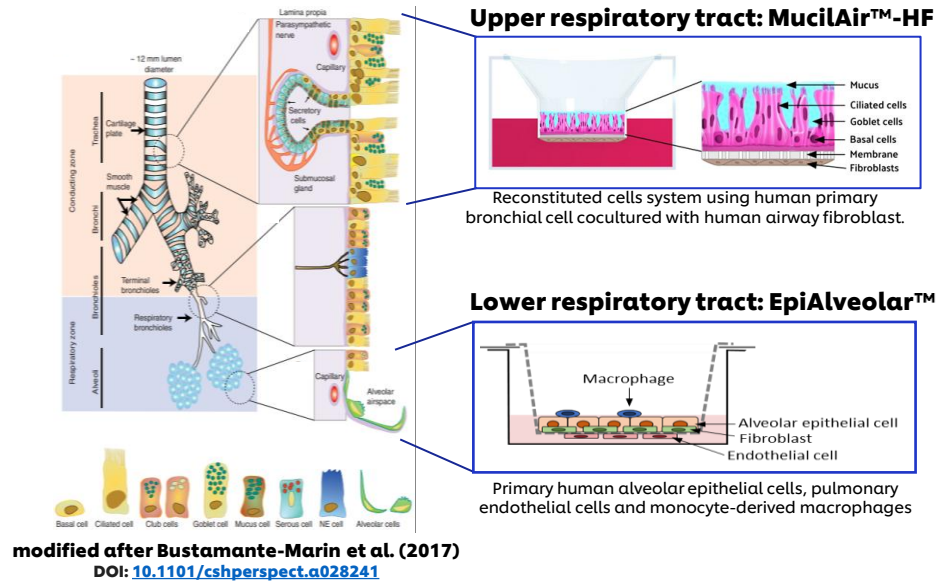


**Bioactivity exposure ratio (BER):**  
the ratio between the *in vitro* PoD and predicted human exposure





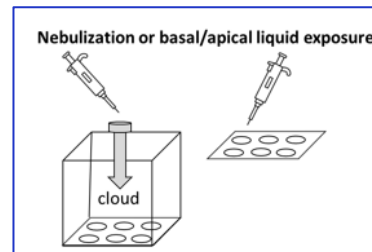
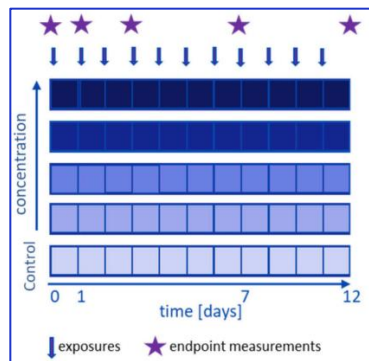
# Human-relevant strategy for selecting NAMs for lung toxicity NGRA



## Selection Criteria:

- 体内样肺毒物暴露：气液界面（ALI）暴露
- 允许重复曝光
- 稳定的组织系统，从生理学上概括了人类呼吸道上皮的许多方面
- 允许测量相关 AOP 的生物标志物：
- MucilAir-HF™ 系列
- 粘液溶解活性和炎症的测量（AOP 148、411、424 和 425）
- EpiAlveolar™
- 细胞（包括免疫感受态细胞/巨噬细胞和成纤维细胞）的氧化应激、纤维化和炎症共培养的测量（AOP 173,1.25, 303,302）

## 12-day exposure scheme:



# Evaluation of the NAM toolbox: selection of test substances

**Benchmark chemicals:** exposure scenarios are associated either with no effects in humans or have been reported to cause adverse respiratory effects

**11 benchmark chemicals** investigated in **14 human low- or high risk exposure scenarios**

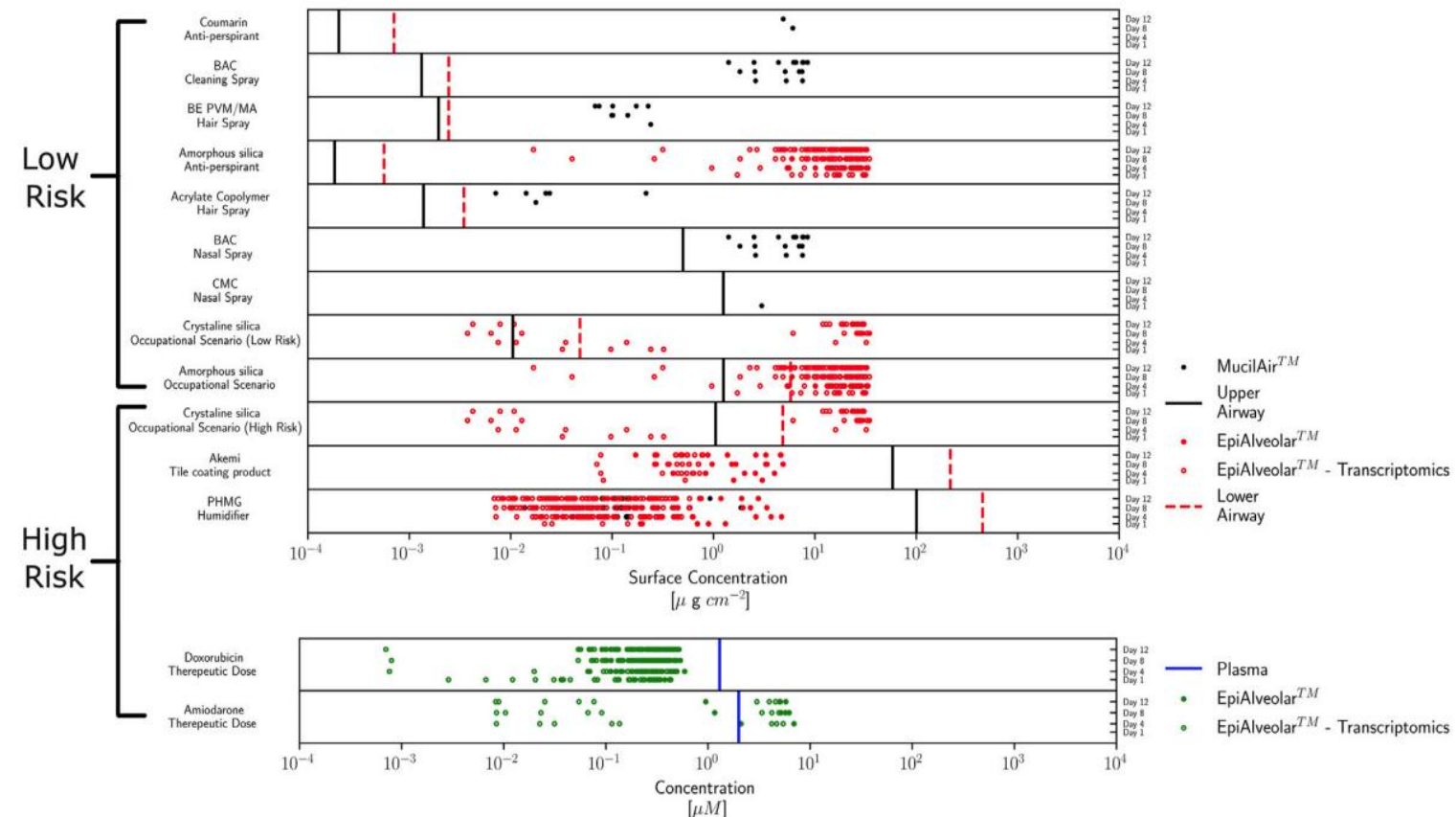
No.	Reference Material	Risk classification	Risk classification reasoning	Product
1	Butyl ester of poly (methyl vinyl ether-alt-maleic acid monoethyl ester) copolymer (BE PVM/MA)	Low	Safe use in cosmetic products	Hair spray
2	Coumarin	Low	Safe use in cosmetic products	Anti-perspirant
3	Acrylate copolymer	Low	Safe use in cosmetic products	Hair spray
4	Amorphous silica	Low	Safe use in cosmetic products	Anti-perspirant
		Low	Safe under recommended exposure limit	Occupational scenario
5	Carboxymethylcellulose sodium salt (CMC)	Low	Safe use in nasal sprays	Nasal spray
6	Benzalkonium chloride (BAC)	Low	Safe use in nasal sprays/ophthalmic products	Nasal spray
		Low	Safe use in homecare products	Cleaning spray
7	Crystalline silica	Low	Safe under permissible exposure limit	Occupational scenario
		High	Silicosis after cumulative exposure	Occupational scenario
8	Polyhexamethyleneguanidine phosphate (PHMG)	High	Serious adverse lung effects in humans	Humidifier
9	Akemi	High	Acute lung toxicity	Tile coating product
10	Doxorubicin	High	Interstitial lung disease in cancer patients	Therapeutic dose
11	Amiodarone	High	Alveolar/interstitial pneumonitis with a subacute onset	Therapeutic dose

Tested in MucilAir™-HF only - Tested in EpiAlveolar™ only - Tested in both tissue models

# In general, for high-risk exposure-chemical scenarios *in vitro* PoDs were lower than the predicted exposure

- The obtained PoDs were combined with exposure estimates to calculate BER values
- BER is able to separate the low- and high-risk benchmark exposure scenarios for 12 out of the 14 scenarios
  - ✓ **Low-risk:** PoDs occurred at higher concentrations than the corresponding human exposure values. **Except:** crystalline and amorphous silica occupational scenarios
  - ✓ **High-risk:** clear overlap between the PoDs and human exposure (lung deposited mass or Cmax)

11 benchmark chemicals investigated in 14 human low- or high risk exposure scenarios



# Defining a safe threshold: animal testing *versus* non-animal NAMs

- Traditional Margin of Safety ( $\text{MoS}_{\text{animal data}}$  for local lung effects) > 25\* → **low risk**

\*Uncertainty safety factor of 25 to account for uncertainties related to interspecies (animal-to-human: 2.5-safety factor) and inter-individual (human-to-human: 10-safety factor) variabilities<sup>1</sup>

- In vitro* Bioactivity Exposure Ratio ( $\text{BER}_{\text{NAM data}}$ ) > 3 → **low risk (?)**

\*Uncertainty safety factor of 3 applied in the chlorothalonil acute inhalation risk assessment to cover potential variation in sensitivity among human population (intraspecies)<sup>2</sup>

- $\text{BER}_{\text{NAM data}} > 3$  would be protective for all benchmark chemicals**, particularly driven by the transcriptomics PoDs for the high-risk exposure scenarios, e.g., Amiodarone and Crystalline silica

Amiodarone - high risk therapeutic dose				
Day	Min PoD	Biomarker	BER	Risk
4	6.95	Cytokine: MMP-1 (Lab 2)	3.47	Low
	0.0084	Transcriptomics: LV30	0.0042	High
8	1.31	Cytokine: ICAM-1 (Lab 1)	0.65	High
	5.20	Cytokine: ICAM-1 (Lab 2)	2.60	High
	0.0084	Transcriptomics: LV30	0.0042	High
12	0.97	Cytokine: ICAM-1 (Lab 1)	0.48	High
	5.03	Cytokine: ICAM-1 (Lab 2)	2.51	High
	0.0083	Transcriptomics: LV30	0.0041	High

Crystalline silica - high risk occupational scenario				
Day	Min PoD	Biomarker	BER	Risk
1	0.032	Transcriptomics: LV131	0.071	High
4	0.0075	Transcriptomics: LV110	0.0041	High
8	34.53	Cytokine: MMP-7 (Lab 2)	11.14	Low
	0.0037	Cytokine: LV110 (Lab 2)	0.0012	High
12	30.51	Cytokine: MMP-7 (Lab 2)	6.32	Low
	0.0042	Transcriptomics: 110	0.00087	High

- Note some differences in EpiAveolar PoDs among Laboratories 1 and 2

<sup>1</sup>ECHA (2012). Guidance on information requirements and chemical safety assessment: chapter R.8: characterisation of dose [Concentration]-Response for human health.

<sup>2</sup>EPA (2021). Document ID: EPA-HQ-OPP-2011-0840-0080. Available at <https://www.regulations.gov/document/EPA-HQ-OPP-2011-0840-0080>

## Concluding remarks

- Strategy of selecting **non-animal NAMs informed by AOPs** associated with pulmonary toxicity can provide relevant biological coverage
- **Further evaluation of the performance of NAM toolbox can build confidence in the protectiveness of the approach:** testing a wider substance dataset with varied mechanisms of action, uses, and balanced low and high-risk benchmarks
- There is a need to **establish scientific confidence** by improving the reproducibility, standardization of protocols, and *in vitro* culture methodologies
- **Benchmarking decision outcomes provides an alternative to the traditional validation of NAMs:**  
apical effects in rodent studies vs. NAMs in the context of making protective safety decisions





# Acknowledgements

## Epithelix Sarl:

- **Samuel Constant**
- **Bernadett Boda**

## Charles River Laboratories:

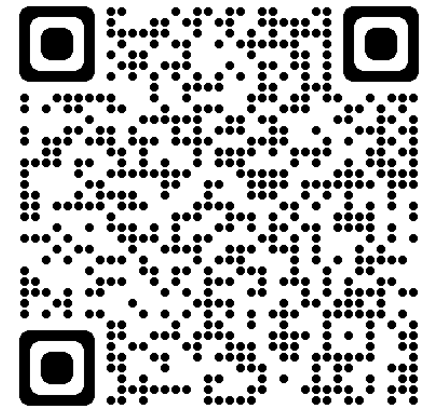
- **Joanne Wallace**

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- **Holger Peter Behrsing**
- **Vivek Patel**

## Unilever:

- **Iris Müller**
- **Hugh Barlow**
- **Alistair Mark Middleton**
- **Mathura Theiventhran**
- **Danilo Basili** (now Société des Produits Nestlé S.A.)
- **Anthony M. Bowden**
- **Ouarda Saib**
- **Patrik Engi**
- **Tymoteusz Pietrenko**
- **Matthew Dent**
- **Carl Westmoreland**
- **Zoë Deag**
- **Claire Peart**
- **Mark Liddell**
- **Beate Nicol**

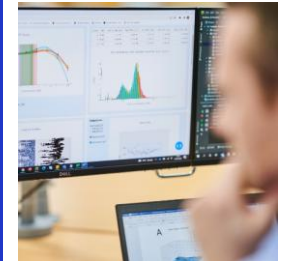


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# NAMs/NGRA Collaborations in China

在中国的合作

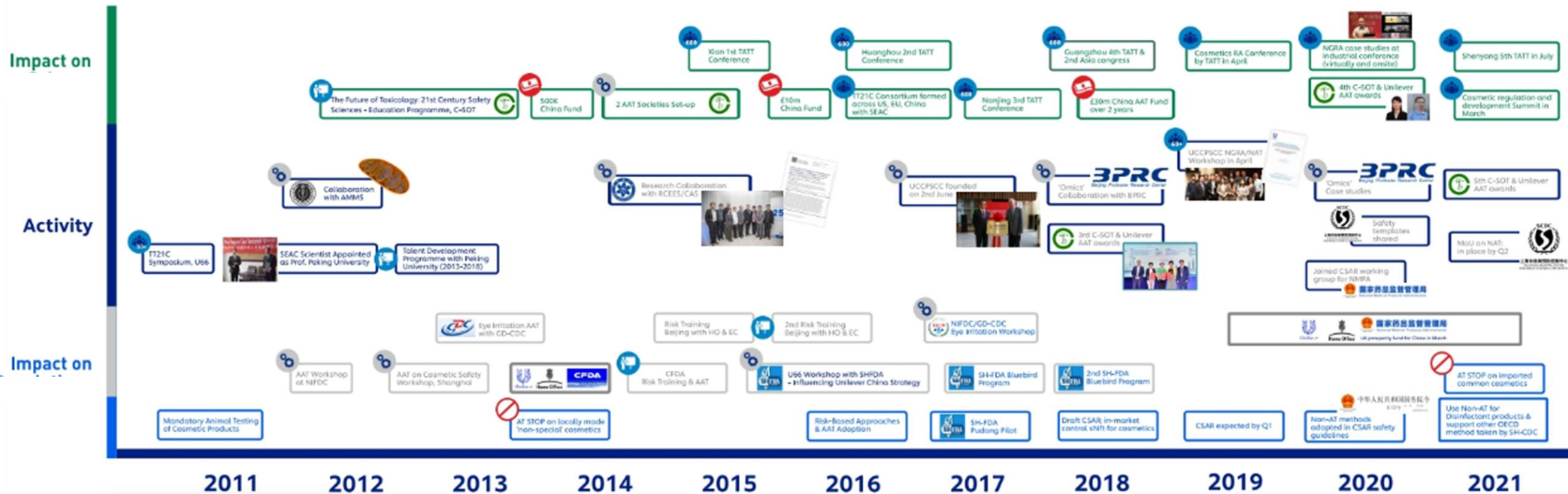
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# Safety Science Journey with China 安全科学中国之旅

## Non-Animal Approaches to Safety in China

Cosmetic Safety: Committed to ending animal testing everywhere we operate





# 中国消费者产品安全合作中心



## 中国消费者产品安全合作中心





# 5. Milestones on NAMs Journey: moving Steadily



**2015 PBPK training by CMU**

**2014, Oct/Nov  
2 TATT set-up**

**2011 TT21  
Symposium**

**NAMs/NGRA on  
Human Health  
(July, 2024 Shenyang)**

**NAMs/NGRA on  
Environmental Safety  
(Sept 2024 @Tianjin)**

**Oct 2024 化学物质预测模型工具学组**  
中国环境科学学会化学品环境风险防控专业  
委员会“化学物质预测模型工具学组”





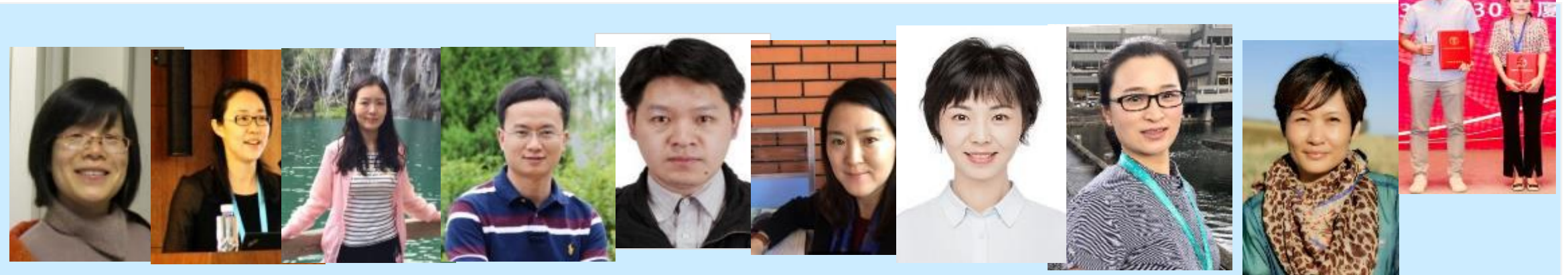
# 中国毒理学替代奖 (2016-2023)

# 2025-2028

## Previous Award Winners



## 9 Innovation award winners



# 2025 中国毒理学会 替代法发展奖



姓名	工作单位	专业贡献
史薇	南京大学	有机污染物的迁移、转化和毒性影响，化学品的高通量筛选和风险评估
秦建华	中国科学院大连化学物理研究所	微流控器官芯片、疾病模型、干细胞、药物评价和分析检测
韦艳宏	中山大学	环境化学物质的心血管毒性作用，环境心脏毒理学中的分子机制、生物标志物和体外模型
徐平	军事医学研究院	蛋白质组学、分子生物学和生物化学，重点是泛素信号传导、翻译后修饰和参与肝纤维化研究
庄树林	浙江大学	计算毒理学和污染物毒代动力学，环境健康



# Thank You for your attention!



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