

Development of a Next Generation Risk Assessment framework for inhalation safety of consumer products

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**Unilever- Safety & Environmental Assurance Centre
(SEAC)**

About Unilever



Unilever Safety & Environmental Assurance Centre (SEAC)

SEAC Purpose: Protecting People & Planet

Trusted Impactful Innovations designed for Safety & Sustainability

Safety and Environmental Science

We want consumers to be confident that our products are safe for them and their families, and better for the environment. The scientists at Unilever's Safety and Environmental Assurance Centre (SEAC) play a key role in ensuring that our products are safe and environmentally sustainable.

Learn more about our science and scientists



Safe and sustainable by design



How we build safety and sustainability into every product innovation.

[SAFETY BY DESIGN >>](#)

Keeping people and the environment safe



The science-based approaches we use to keep our consumers, workers and the environment safe.

[SAFETY RISK ASSESSMENTS >>](#)

Reducing our environmental impact



How we harness the latest science to minimise our environmental footprint.

[OUR SCIENTIFIC APPROACH >>](#)

We use **scientific evidence-based risk and impact assessment methodologies** to ensure that the risks / impacts of adverse human health and/or environmental effects from exposure to chemicals used in our products, processes & packaging are **acceptably low**.

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)



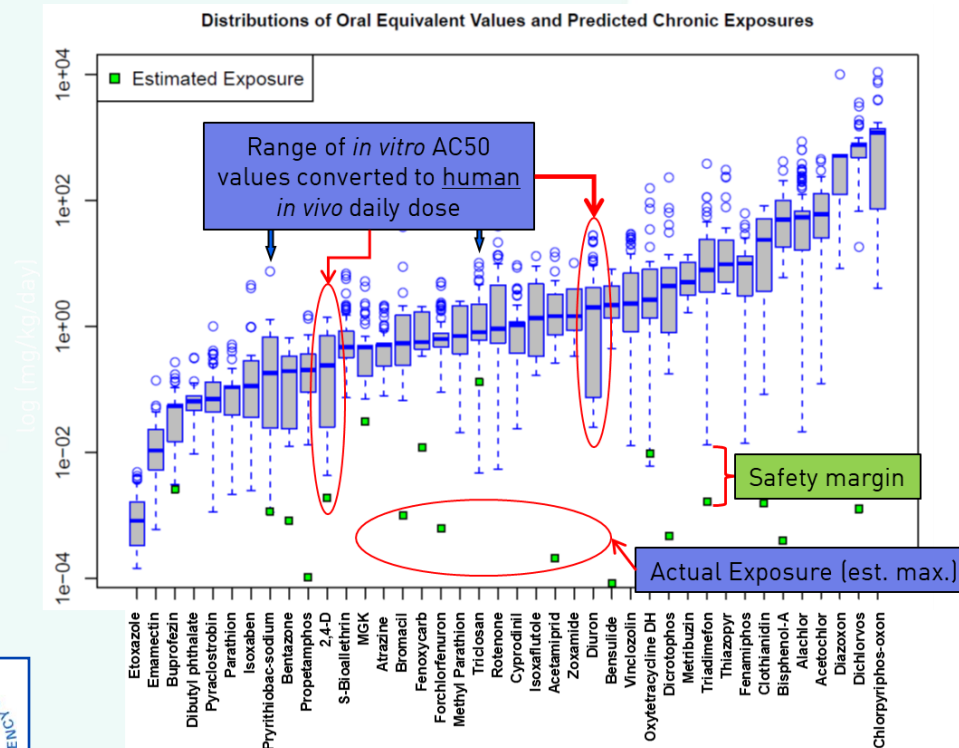
Shampoos



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***



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.**



Slide from Dr Rusty Thomas, EPA, with thanks

Rotroff, et al. Tox.Sci 2010



General strategy to developing an inhalation toolbox

Hypothetical
Case study
based
approach

New polymers for use in antiperspirants
& silanes for use in general purpose
cleaners

- Chemistry; phys-chem properties
- Potential hazards
- Existing information

Exposure- led

Exposure is calculated using consumer
habits and practices.
A tiered modelling approach is applied
to simulate realistic consumer exposure

- **Product type:** formulation & hardware
- **Particle size** distribution
- **Consumer habits and practices:**
 - E.g. antiperspirant: application 2x/day, 2s per axillae, exposure duration 10 min, room volume 10m³.
- **Tiered modelling approach.**
- **In vitro exposure doses** are informed by predictions from **MPPD** (Multiple Path Particle Dosimetry) model.



Hypothesis-
driven

Identification of key hazard concerns for
the chemicals of interest

Lung fibrosis

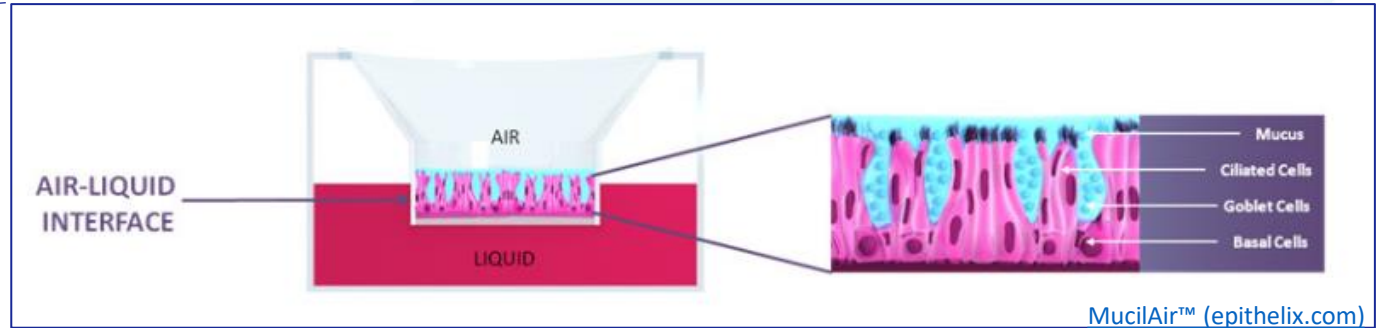
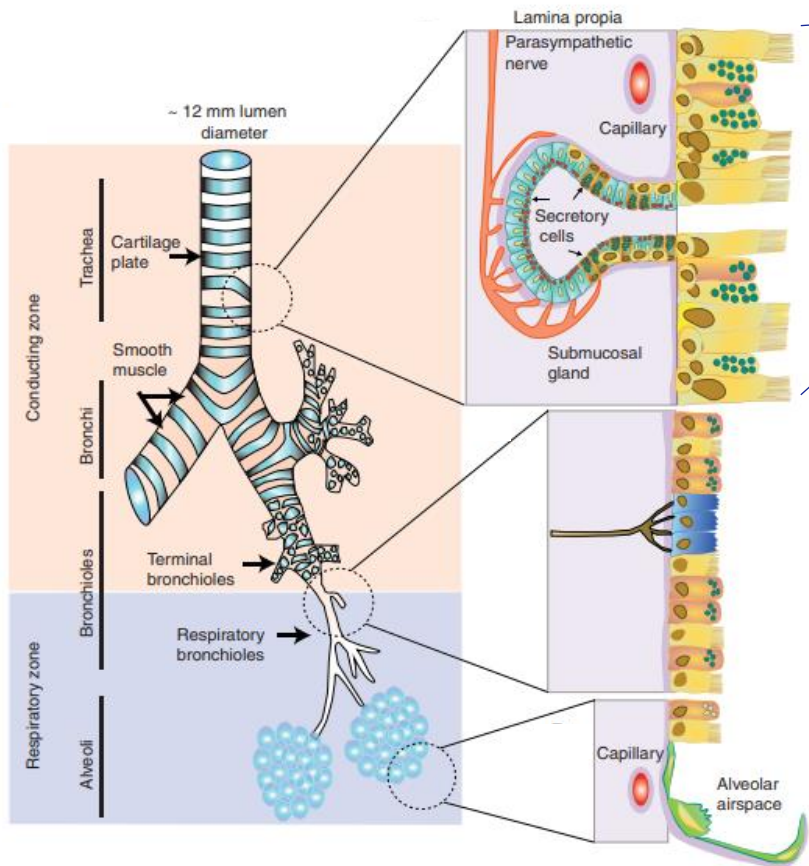
Impairment of
mucociliary
clearance

Lung
surfactant
inhibition

Biopersistence
/Clearance

- NAMs identification and evaluation using benchmark compounds

Upper Airway – The MucilAir™-HF cell system (Epithelix)



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

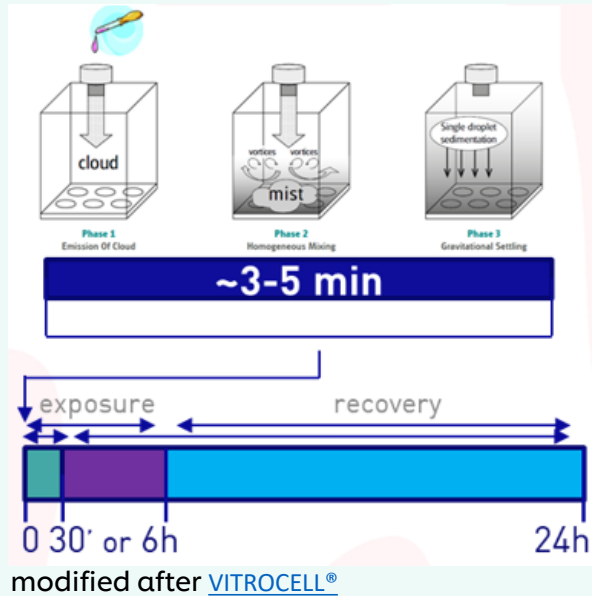
Selection Criteria:

- Exposure at the ALI
- Stable cells system which allows repeated exposure
- Allows measurement of biomarkers of relevant AOP's
- Mechanistic approach; allowing measurement for mycolitic activity as well as for inflammation (AOP 148, 411, 424 & 425)

functionality	biomarker	acute	chronic
mycolitic activity	mucus secretion, cilia beating (CBF), mucociliary clearance (MCC)	irritation, enhanced chance of airway infection	goblet cell hyperplasia, asthma, COPD
barrier function	tissue integrity (TEER, LDH), cytokine/chemokine release, extracellular matrix accumulation	local cytotoxicity, inflammation	airway remodelling, Asthma, COPD, lung fibrosis

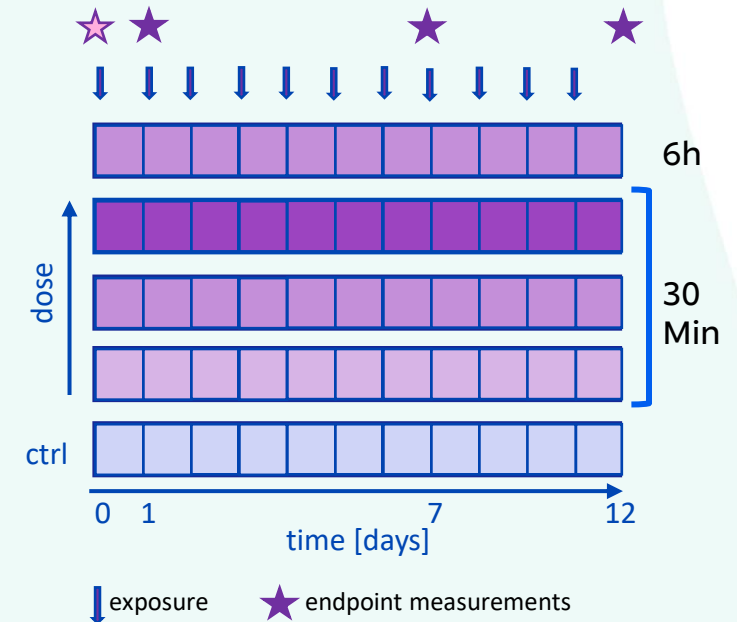
modified after Bustamante-Marin, et al. 2017

Upper Airway – Experimental design



- Cells were exposed with nebulised compound if possible using the VITROCELL®Cloud chamber
- Daily exposure duration was aligned to adjust for mucociliary clearance of the upper airway (Paul et al. , Pulmonary Medicine 2013; Gizurarson, Biol. Pharm.Bull. 2015, 38(4); Herve et al., Chest 1993 103(1)).

- Repeated exposure was conducted on a daily basis for up to 12 days and the different biomarkers were measured at least for day 0, day 1, day 4, day 7 and day 12
- All endpoints were measured after a recovery period 24h after exposure, with the exception of day 0 and additional MCC measurement was taken 30min after exposure



Upper Airway – results benchmark chemicals

For each benchmark chemical:

- Exposure scenario was defined and classified as high or low risk
- *In vitro* and *in vivo* hazard data collated

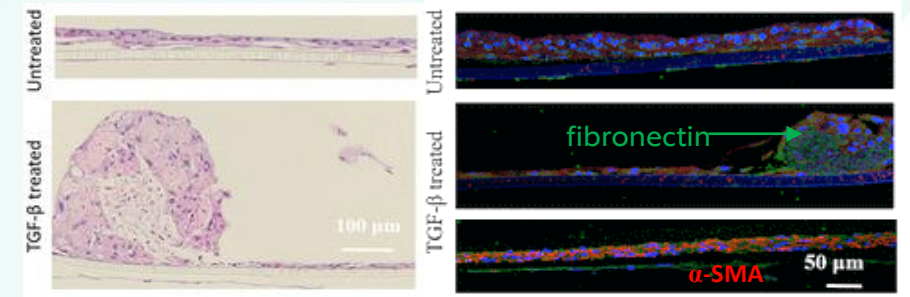
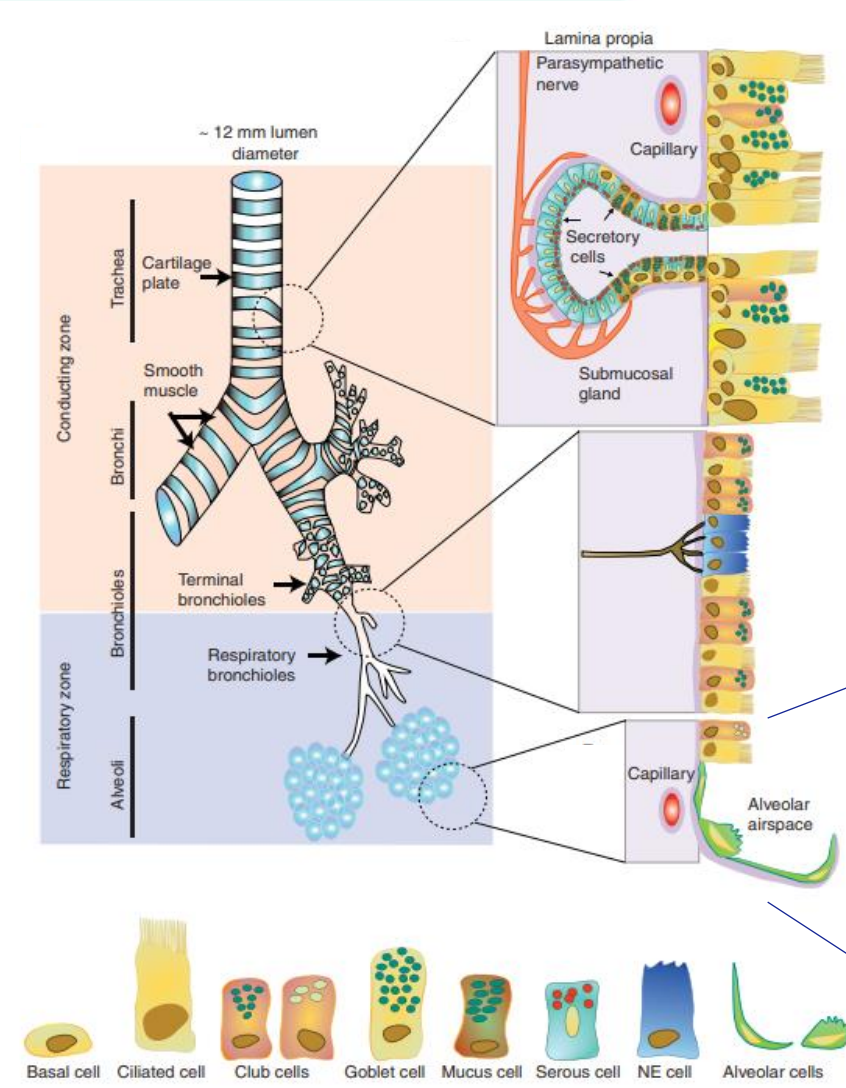
Modulators of cilia beating frequency or/and mucus production	Inflammation	Negative controls (history of safe use)
<ul style="list-style-type: none"> • Benzalkonium chloride ✗ • LPS ✗ • Carboxymethylcellulose ✗ • Acrolein ✗ • Isoproterenol ✓ • Chlorocresol ✗ • Nicotine ✗ • CFTRinh-172 ✗ • TNF-alpha ✗ 	<ul style="list-style-type: none"> • TNF-alpha ✓ • Benzalkonium chloride ✓ • Acrolein ✗ • LPS ✗ • Isoproterenol ✗ 	<ul style="list-style-type: none"> • Coumarin ✓ • Sulforaphane ✓ • Acudyne™ DHR polymer ✓ • Gantrez™ ES-425 ✓

✓ results as expected ✗ unexpected outcomes



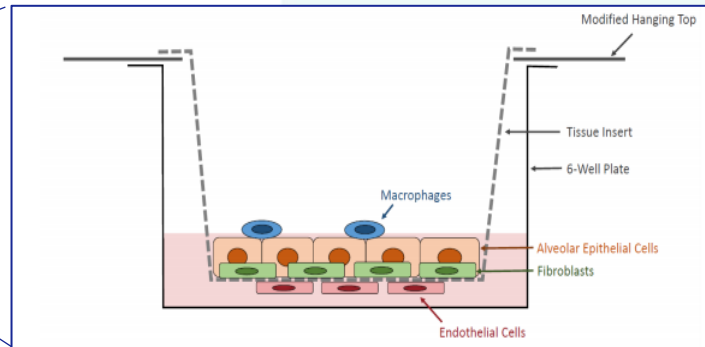
Gaps identified: Interindividual variability, dosing, variability/sensitivity of the cell model.

Lower Airway – The EpiAlveolar™ cell system (MatTek)



Barosova et al., ACS Nano 2020, 14, 4, 3941–3956

functionality	biomarker	acute	chronic
barrier function	tissue integrity (TEER, LDH), mitotoxicity, cytokine/chemokine release, extracellular matrix accumulation	local cytotoxicity, inflammation, wound healing	airway remodelling/scarring, lung fibrosis



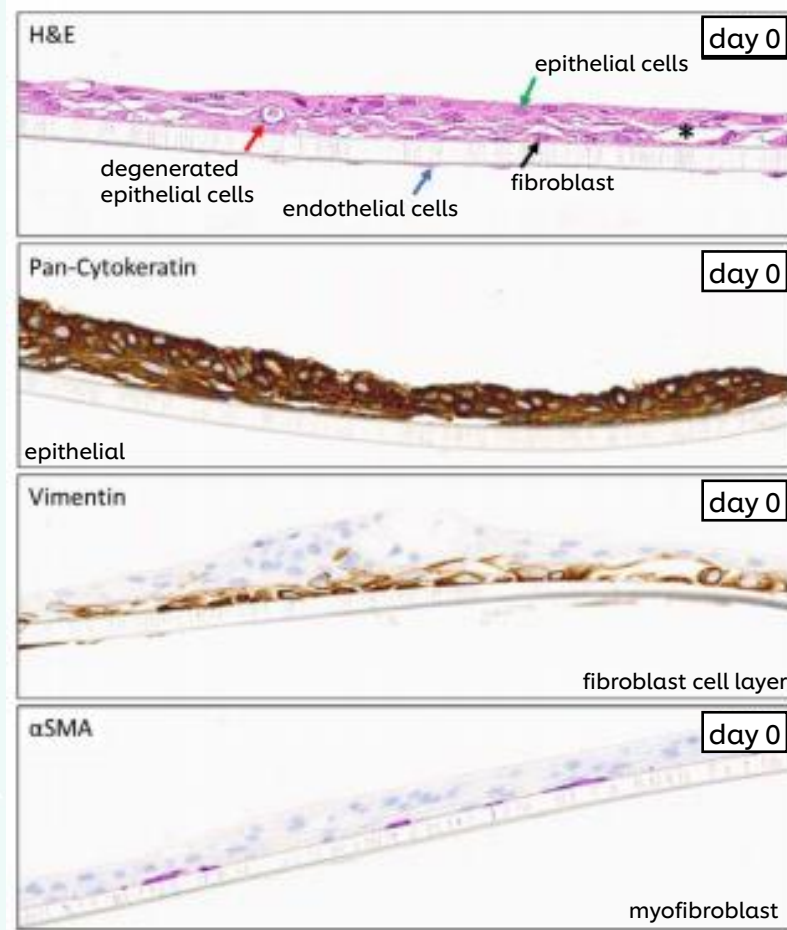
primary human alveolar epithelial cells, pulmonary endothelial cells and monocyte-derived macrophages

- Selection Criteria:**
- Exposure at the ALI
 - Stable cells systems which allows repeated exposure
 - Mechanistic approach; allowing measurement oxidative stress and inflammation (AOP173)
 - Co-culture of cells including immune competent cells/macrophages and fibroblast

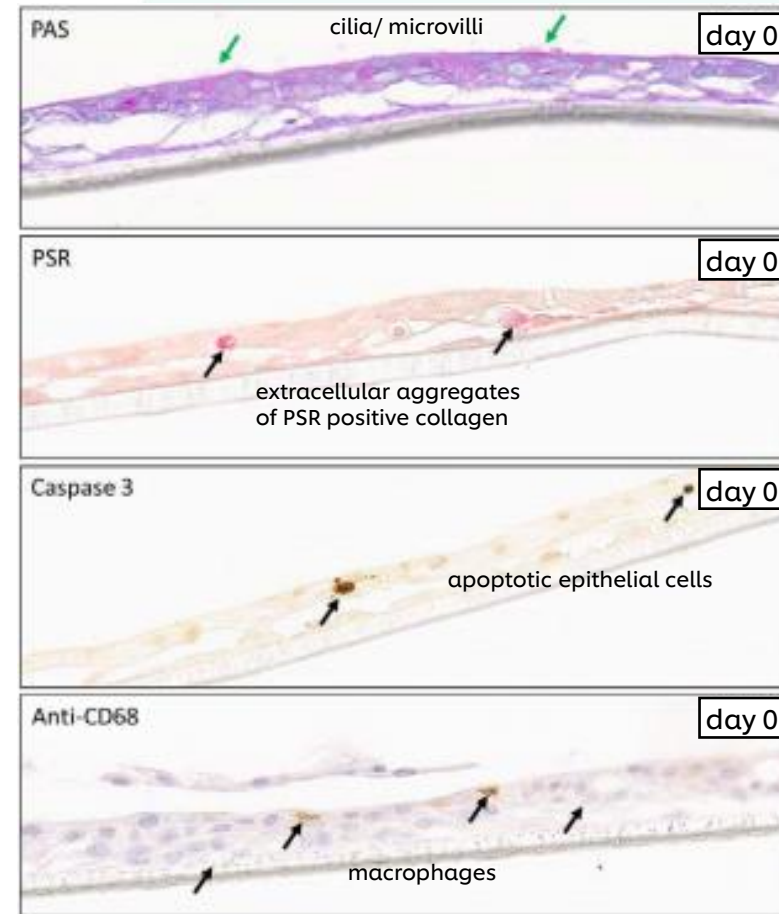
modified after Bustamante-Marin, et al. 2017



Morphology of EpiAlveolar™ cell model

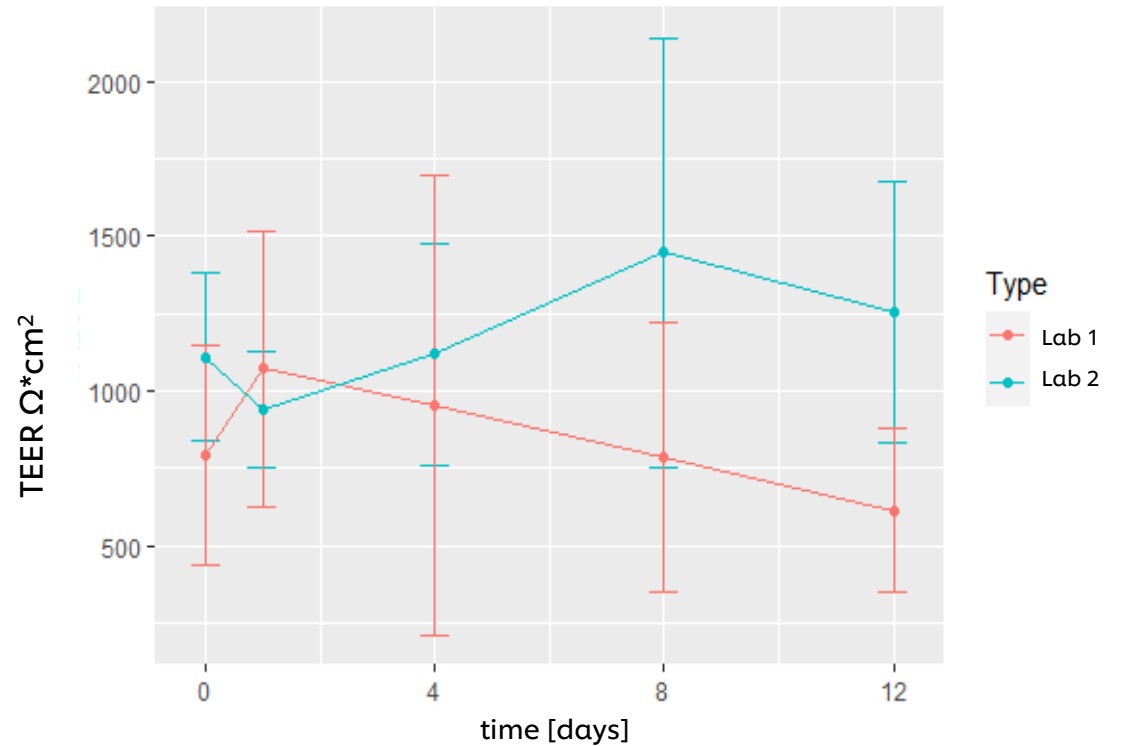
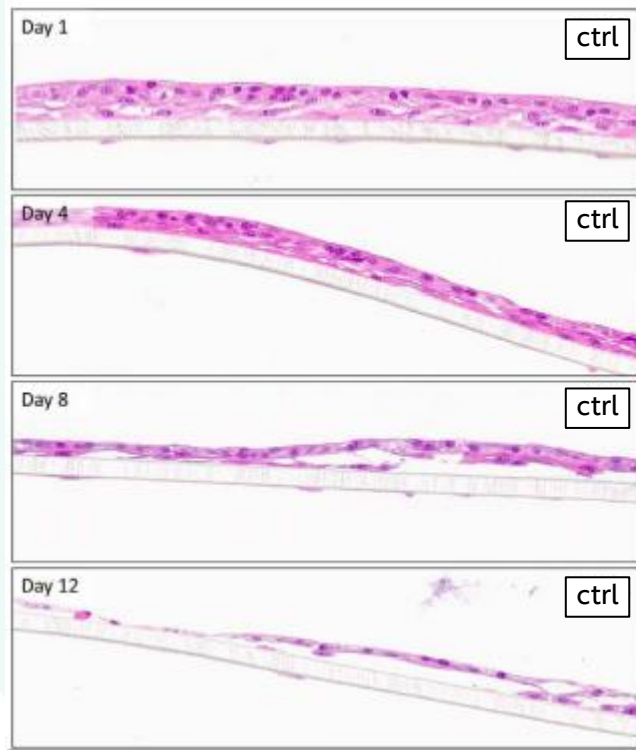


* intracellular separation



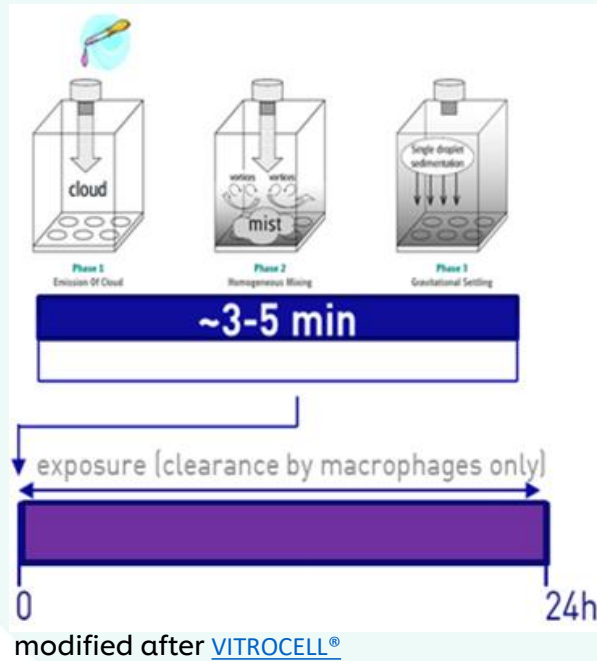
➔ No staining with prosurfactant C (marker for AT2 cells) could be detected. However inclusion of AT2 cells were shown in Borosva et al., 2020

Morphological changes of the EpiAlveolar™ cell model over time



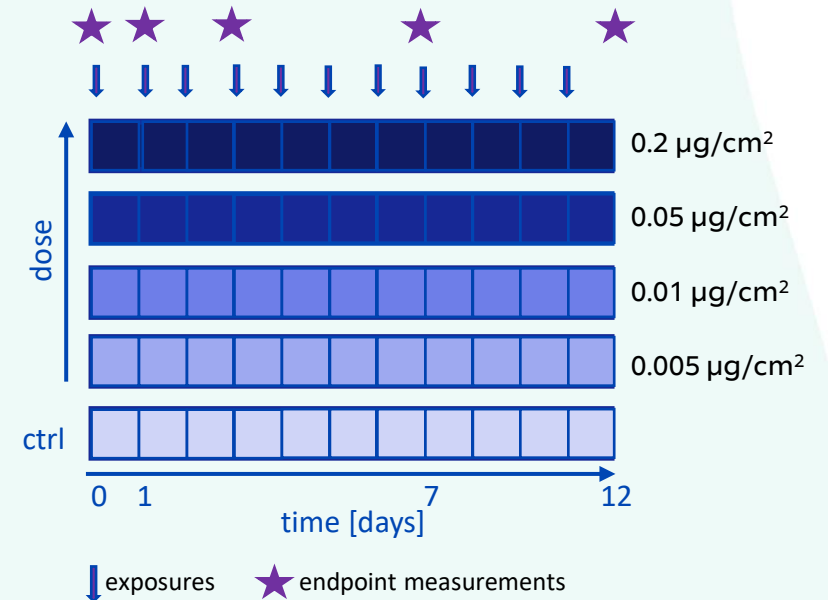
- Thinning of the EpiAlveolar tissue from a 2-4 cell layer down to a single cell layer
- Barrier functions remains stable over time, with some variability between laboratories

Lower Airway – Experimental design



- Cells were exposed with nebulised compound using the VITROCELL®Cloud chamber
- Cells were exposed for 24h without recovery

- Repeated exposure was conducted on a daily basis for up to 12 days and the different biomarkers were measured at least for day 0, day 1, day 4, day 7 and day12



Lower Airway – results benchmark chemicals

For each benchmark chemical:

- Exposure scenario was defined and classified as high or low risk
- *In vitro* and *in vivo* hazard data collated

Inflammation/ fibrosis, cytotoxicity	Negative controls (history of safe use)/case studies
<ul style="list-style-type: none">• Amiodarone ✓• Doxorubicin ✓• Min-u-Sil5 (crystalline silica) ✗• Aerosil 200 (amorphous silica) ✗• LPS ✗• PHMG ✓	<ul style="list-style-type: none">• Sulforaphane ✓

✓ results as expected ✗ unexpected outcomes

➔ Gaps identified: dosing, variability/sensitivity of the cell model.

Case Study

Hypothetical inclusion of a novel preservative in Hairsprays

Ongoing development of an Inhalation Framework

Collate Existing Information/ Problem Formulation

Exposure*

Use scenario

Consumer Habits
and Practices

Particle Size
Distribution

Tier 1 – screening
assessment

Tier 2 – in silico
exposure
modelling e.g.
ConsExpo/2-box

Tier 3 –
Experimental data

Regional Lung
Deposition
modelling

Hazard data

Molecular
Structure

In silico
predictions (PCA)

Protein content

Existing in vivo
data

Read Across

Data Generation

Acute and Chronic

ALI Upper Airway
(Irritation, remodelling, clearance
mechanism dysfunction,
inflammation)

ALI Lower Airway
(Lung Fibrosis, inflammation)

Lower Airway
(Macrophage clearance,
biopersistence, surfactant disruption)

Microphysiological Systems

Determine Point of Departure and Margin of Exposure / BER

Exposure based
waiving

DNEL derivation

Chemical Sensitiser
benchmarking

In vitro concentration-
response modelling

Risk Assessment Conclusion

Risk decision
based upon
Weight of
Evidence

Baltazar et al., (2020) *Tox Sci*, Volume 176, Issue 1, Pages 236–252, <https://doi.org/10.1093/toxsci/kfaa048>

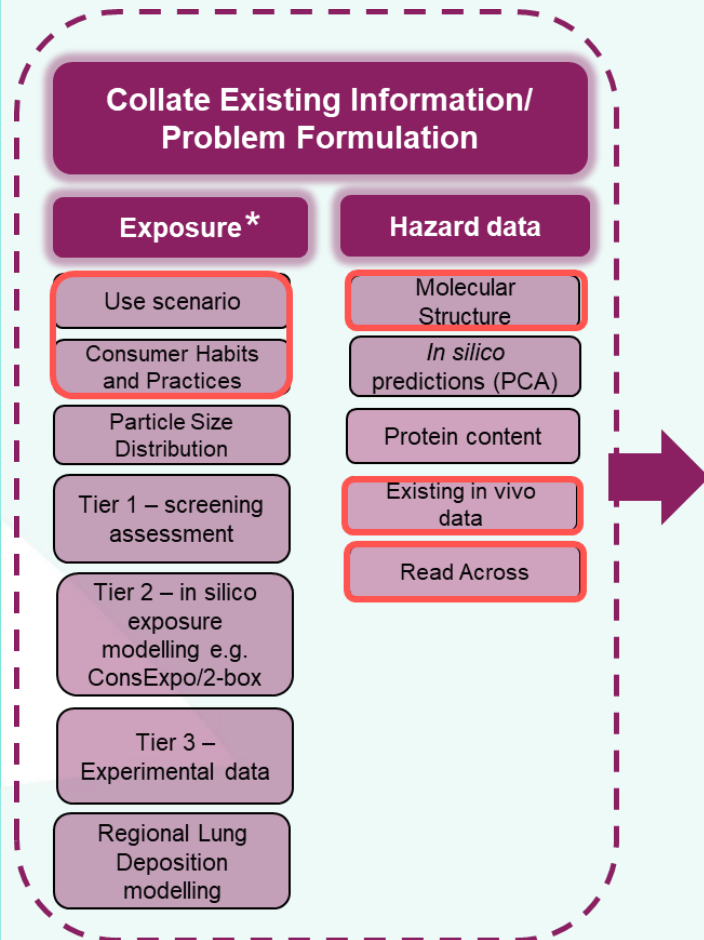
* Consumer Exposure in Inhalation risk assessment

Hypothetical Case study – 0.25% of a novel preservative in a hairspray aerosol

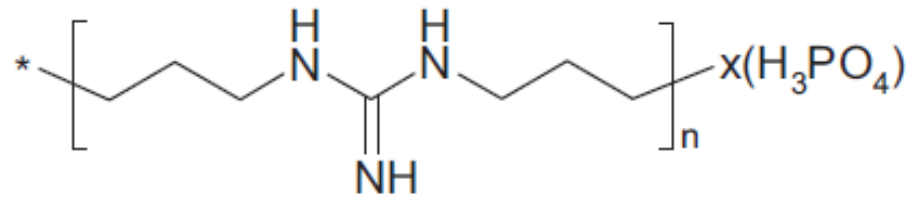
We have applied this framework to the chemical polyhexamethyleneguanidine phosphate (PHMG) to look at exposures:

- (a) for an hypothetical case study imagining it was a new ingredient for a hairspray.
- (b) that are known to be adverse in humans after during normal used of household humidifiers (Park et al 2015. Indoor Air 25(6): 631-640).

Hypothetical Case study – 0.25% of a novel preservative in a hairspray aerosol



Chemical identify



Polyhexamethyleneguanidine phosphate ($n/x=1\sim 2$)
(PHMG phosphate)
CAS RN 89697-78-9

Oligomer, MW=
500-700 g/mol

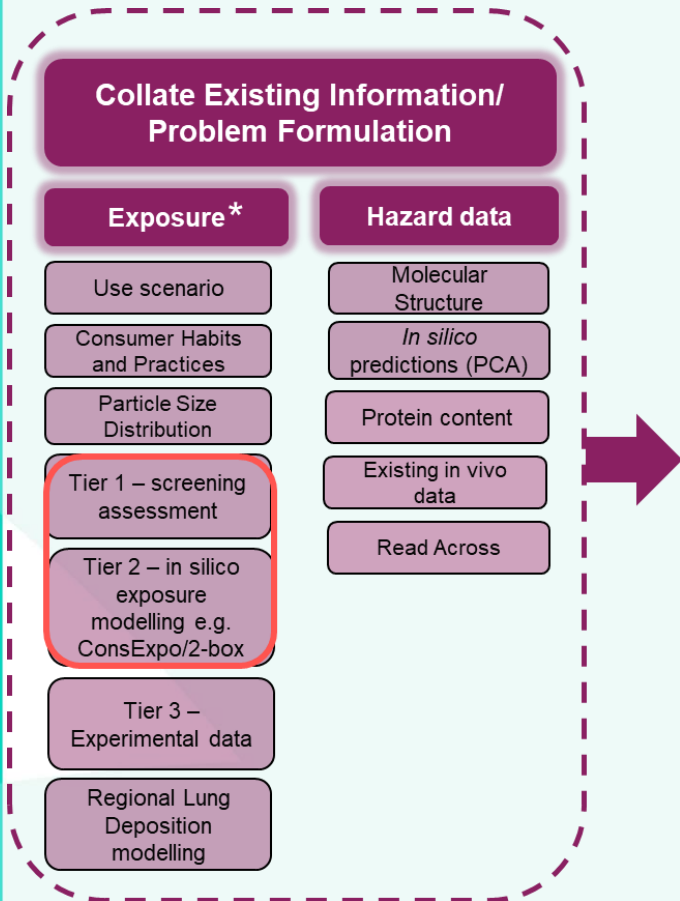
Assumptions:

- No existent animal or human
- No read-across available

Use scenario & Consumer habits and practices:

- **Spray rate:** 0.6 g/s
- **Spray duration:** 10s
- **Number application per day:** 1
- **Breathing zone:** 1 m³

Hypothetical Case study – Tier 1 exposure assessment

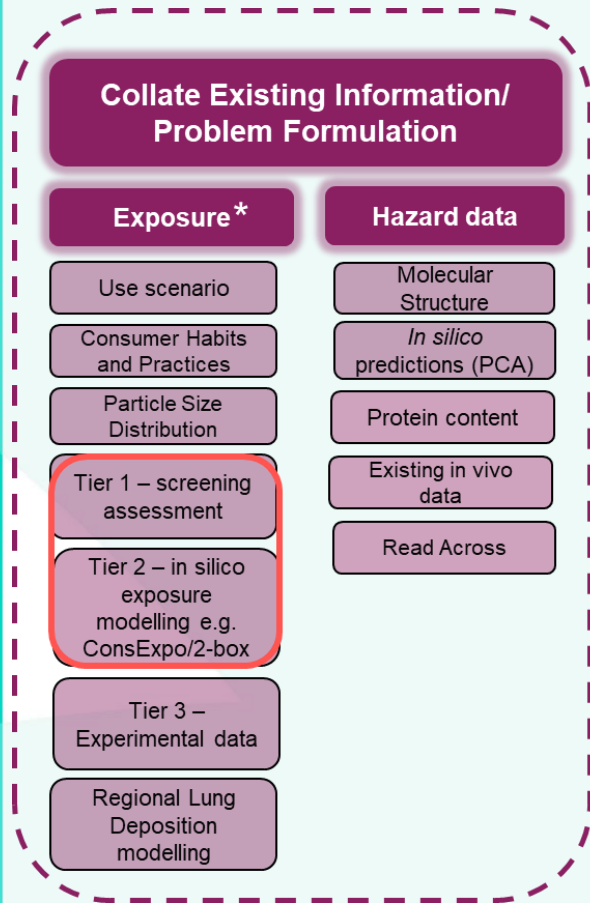


$$\text{Tier 1 Exposure} = \frac{\text{Weight of Ingredient in the Spray Formulation} \left[\frac{\text{mg}}{\text{m}^3} \right]}{\text{Room Volume}}$$

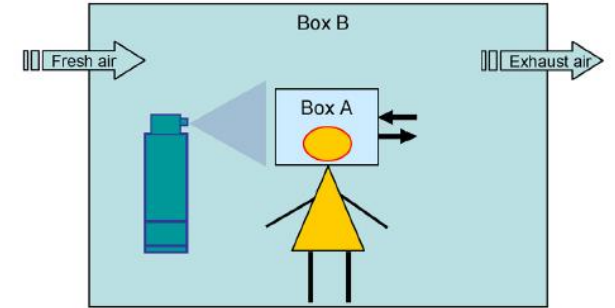
$$= \frac{0.6 \text{ g/s} \times 10\text{s} \times 1 \times (0.25/100)}{1 \text{ m}^3} = 15 \text{ mg/m}^3$$

This is a conservative approach that assumes that 100% of the substance in the consumer product or article will be released at once and homogeneously into the room and there is no ventilation. The duration of exposure is 24 hours and all released material is 100% inhalable

Hypothetical Case study – Tier 2 - 2-Box Indoor Air Dispersion model developed by RIFM



Input	Spray rate (mg/min)	36000
	Inclusion level (%)	0.25
	Emission duration (min)	0.1667
	Number of applications	1
	Zone 1 volume (m3)	1
	Zone 2 volume (m3)	19.1
	Air flow (1 -> outside) (m3/min)	0
	Air flow (2 -> outside) (m3/min)	1.89
	Air flow (1 -> 2) (m3/min)	7.24
	Time in zone 1 (min)	1
	Time in zone 2 (min)	9
	Body weight (kg)	60
	Inhalation rate (L/min)	20
	Initial zone 1 concentration (mg/m3)	0
Initial zone 2 concentration (mg/m3)	0	
Time step (min)	0.02	
Exposure duration (min)	10	
Output	Mean zone 1 for 1st minute (mg/m3)	2.690339
	Mean zone 2 for next 9 minutes (mg/m3)	0.505035
	Time-weighted average (mg/m3)	0.7



Images from: Steiling et al., 2014. Principle considerations for the risk assessment of sprayed consumer products. Toxicology Letters 227 (2014) 41–49

<http://www.rifm.org/uploads/Inhalation%20Modeling%202-Box%20Webinar%201.17.2012.pdf>

Hypothetical Case study – Regional Lung Deposition Modelling

Collate Existing Information/ Problem Formulation

Exposure*

Use scenario

Consumer Habits
and Practices

Particle Size
Distribution

Tier 1 – screening
assessment

Tier 2 – in silico
exposure
modelling e.g.
ConsExpo/2-box

Tier 3 –
Experimental data

Regional Lung
Deposition
modelling

Hazard data

Molecular
Structure

In silico
predictions (PCA)

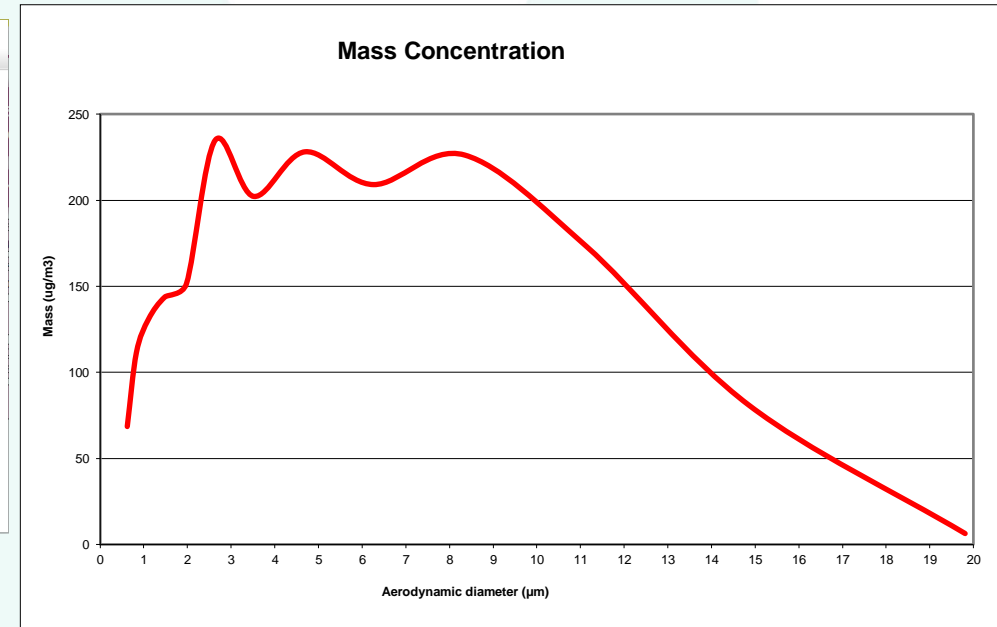
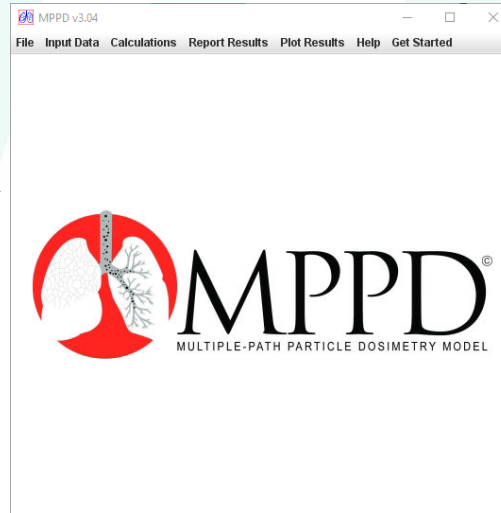
Protein content

Existing in vivo
data

Read Across

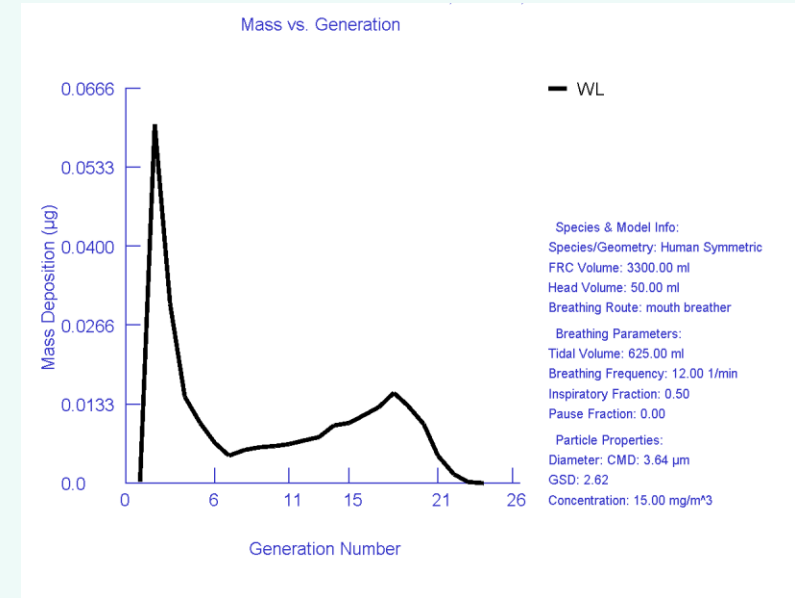
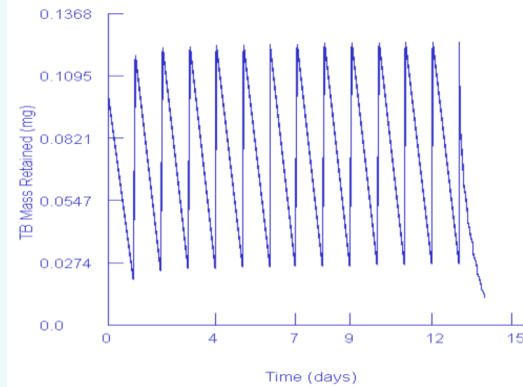
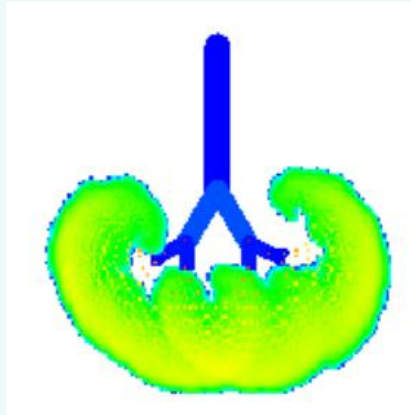
Measured Particle Size Distribution

Mean Mass Aerodynamic
Diameter : $3.64 \pm 2.62 \mu\text{m}$



Hypothetical Case study – Regional Lung Deposition for repeated exposures

Lung Geometry : Yeh-Schum Symmetric with default clearance



	Airborne Concentration	Day 1 $\mu\text{g}/\text{cm}^2$		Day 12 $\mu\text{g}/\text{cm}^2$	
		Upper	Lower	Upper	Lower
Tier 1	15 mg/m^3	0.086	0.0011	0.129	0.0136
Tier 2	0.7 mg/m^3	0.004	5.48E-05	0.006	6.35E-04

PHMG Humidifier exposures associated with adverse effects in humans

Parameters used to calculate Tier 1 screening assessment – airborne concentration (mg/m³):

- Concentration of PHMG in the disinfectant (µg/ml): 1276
- Disinfectant volume (mL): 10
- Frequency (number of applications): 2
- Volume of the room (m³): 27
- Degree of ventilation: 1 (assumed no ventilation)



Airborne PHMG level estimated (mg/m³)

$$= \frac{10 \text{ ml/addition} \times 2 \text{ additions} \times 1276 \text{ ug/ml} \times 1}{27 \text{ m}^3}$$

= 0.95 mg/m³



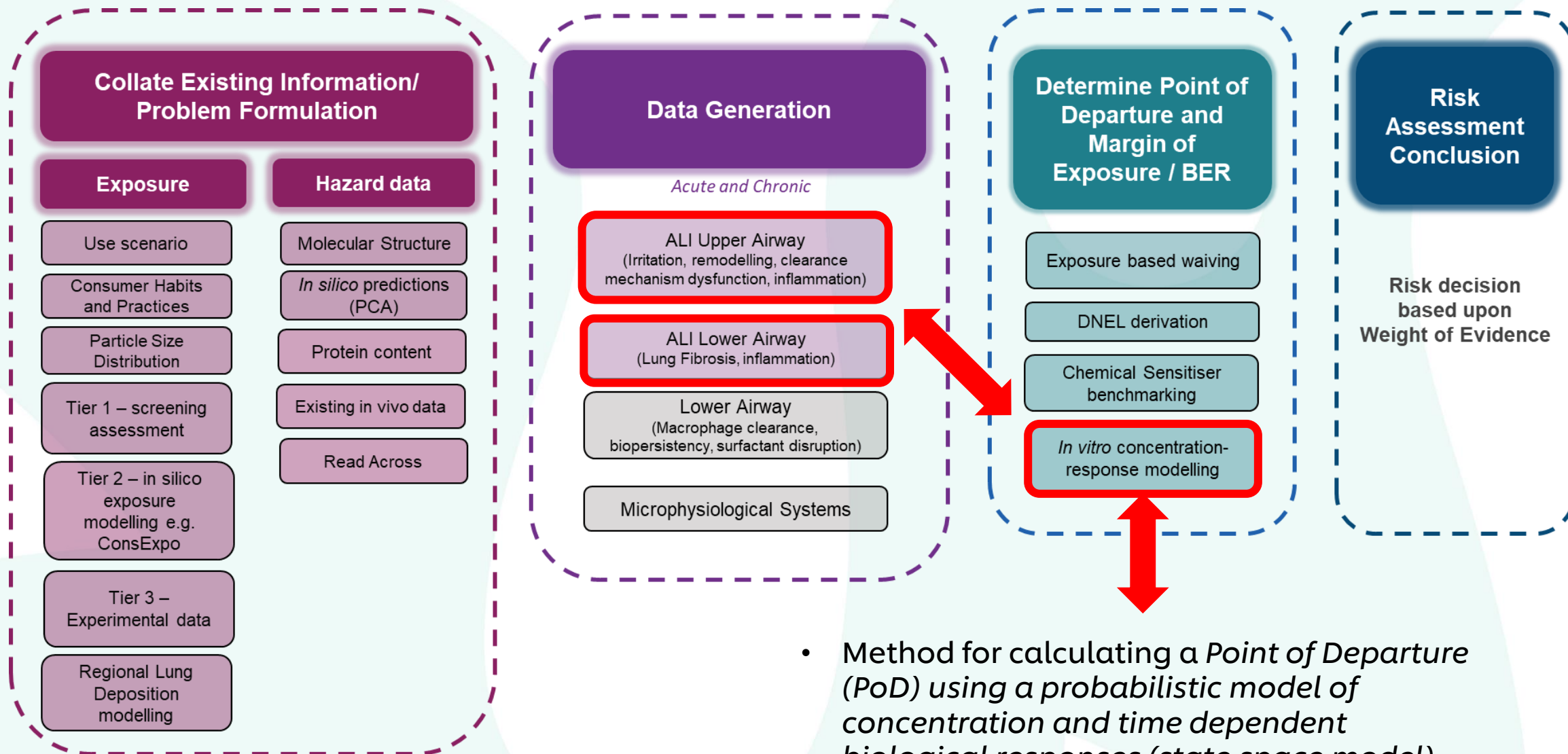
MMAD: 80 nm

GSD: 1



Mass	Upper µg/cm ²	Lower µg/cm ²
1 Day	0.07268	0.00136
12 Day	0.109848	0.015757

Ongoing development of an Inhalation Framework

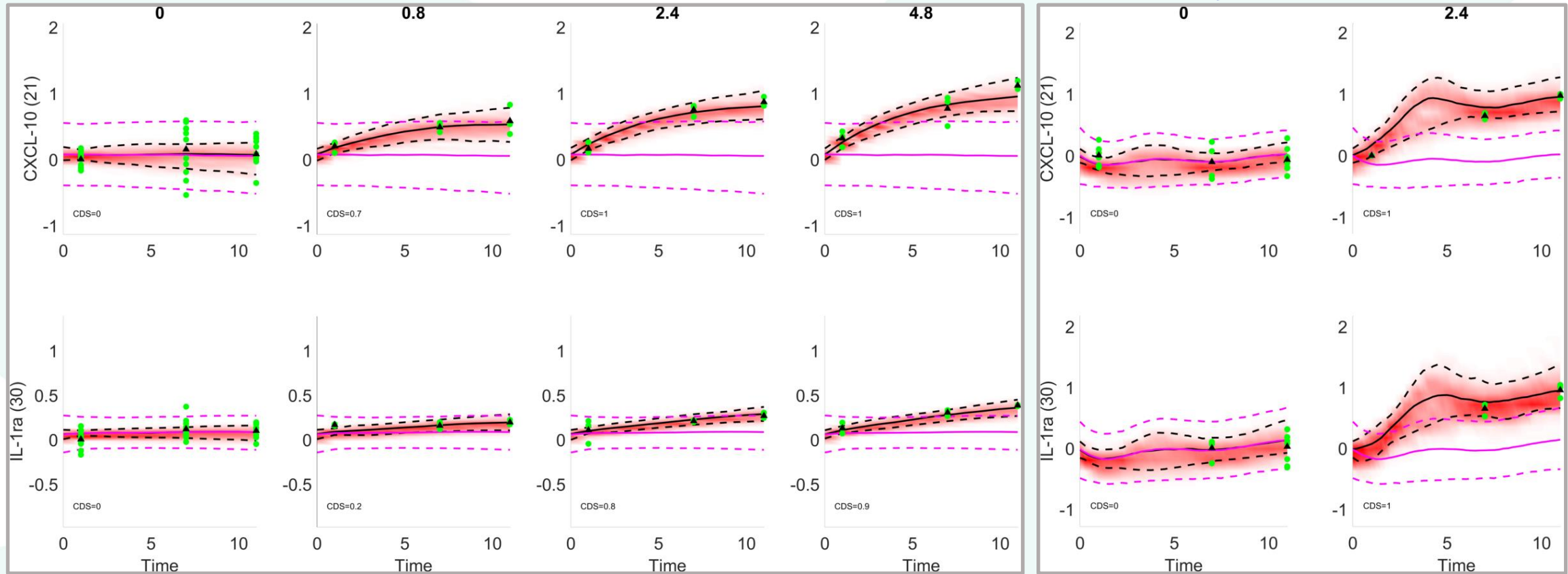


- Method for calculating a *Point of Departure (PoD)* using a *probabilistic model of concentration and time dependent biological responses (state space model)*

Case study: PHMG causes a mild inflammatory response in MucilAir™ cell model

30 minutes exposure duration

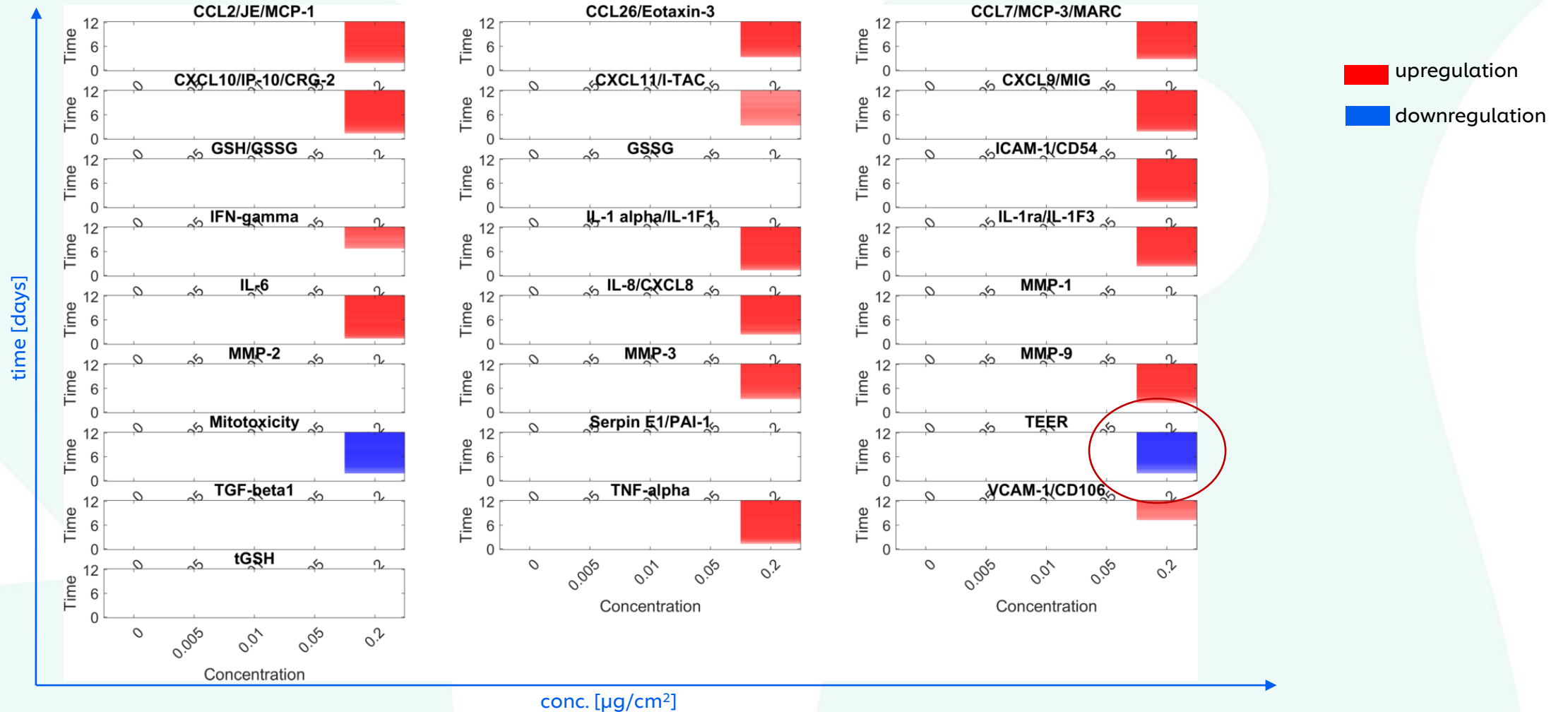
6h exposure duration



Pink dashed line – 95% cred range of control.
Black dashed line – 95% cred range of mean response
Green dots – data points

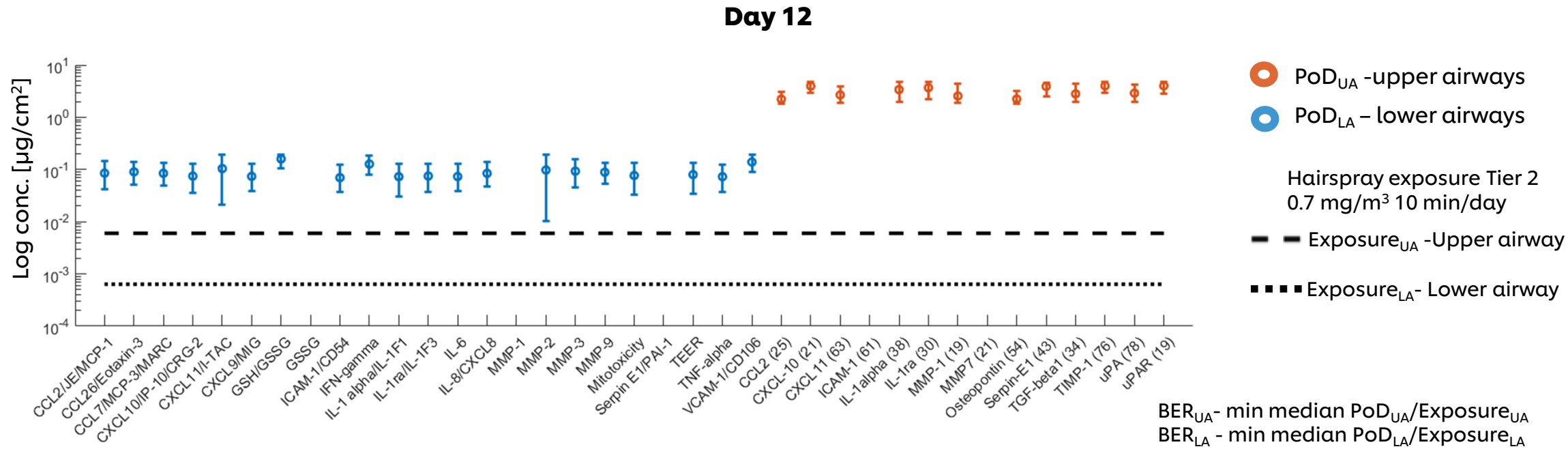
- Out of 26 biomarkers, only 2 showed significant changes, across dose and time
- Other biomarkers that had borderline dose-response were not considered for the BER plots
- PHMG was not cytotoxic in this model up to the dose tested

PHMG causes cytotoxicity in EpiAlveolar™ cell model



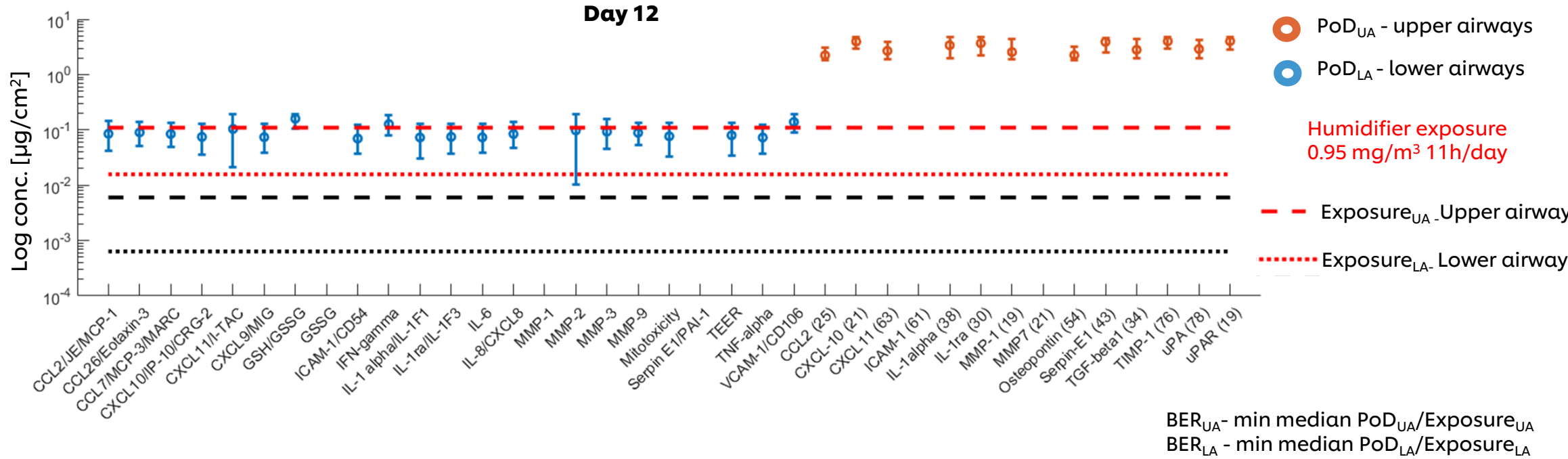
- Daily exposure of 0.2 µg/cm² leads to loss of tissue integrity (TEER) accompanied by increased release of pro-inflammatory cytokine markers and ECM accumulation.
- These results might reflect the *in vivo* situation in humans where PHMG leads to acute interstitial pneumonia which is characterised by diffuse alveolar damage (Kim et al (2016). Arch Toxicol 90(3): 617-632).

Hypothetical Case study: Calculation Bioactivity-exposure ratio (BER) for the hairspray exposure



Bioactivity-exposure ratio (BER)	Hairspray exposure
BER _{UA}	366
BER _{LA}	110

Benchmarking against existent known human exposures to PHMG associated with adverse effects in humans



Bioactivity-exposure ratio (BER)	Hairspray exposure	Humidifier exposure
BER _{UA}	366	20
BER _{LA}	110	4.4

Kim et al (2016). Arch Toxicol 90(3): 617-632
 Jung et al 2014). Toxicology in Vitro 28(4): 684-692.
 Park et al (2015). Indoor Air 25(6): 631-640.



Concluding remarks

- Evaluation of NGRA needs to be in the context of how to combine estimates of exposure and bioactivity to give reproducible decisions on safety with transparent measurement of uncertainty
- Large scale evaluation exercises & case studies can increase confidence in NAMs – for inhalation identification of benchmark chemical-exposures is urgently needed to allow us to assess the robustness of NAMs and define a protective BER.
- Through the process of this evaluation we can identify gaps in our approaches and design new testing strategies to address them
- Currently investigating other relevant endpoints such as surfactant inhibition and incorporating better clearance models

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