



Use of Next Generation Risk Assessment to Evaluate the Human Safety of Sunscreen Active Ingredients

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Ab Initio Case Study: Oxybenzone NGRA

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Principles of Next Generation Risk Assessment (NGRA)

“...an exposure-led, hypothesis-driven risk assessment approach that integrates New Approach Methodologies (NAMs) to assure safety without the use of animal testing”

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

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

Principles describe how a NGRA should be conducted:

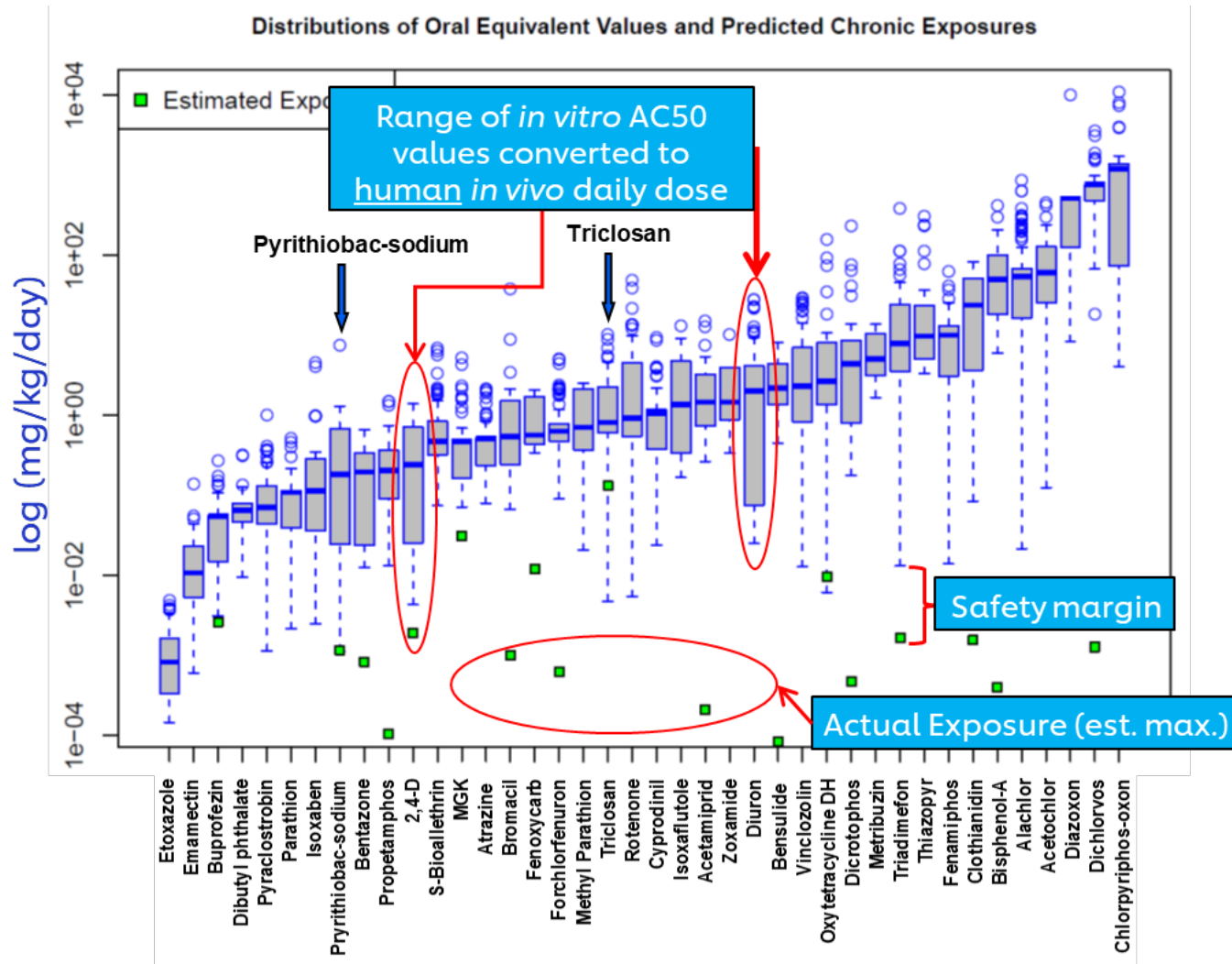
- Following an appropriate appraisal of existing information
- Using a tiered and iterative approach
- Using robust and relevant methods and strategies

Principles for documenting NGRA:

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



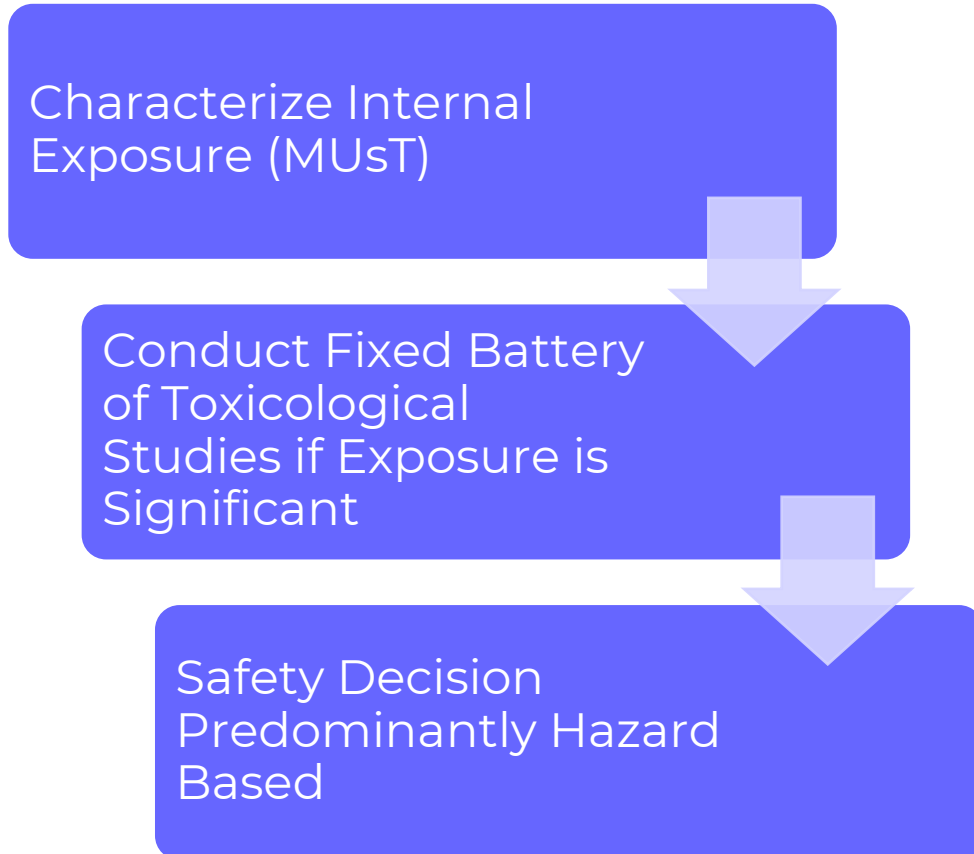
Protection and prediction – This NGRA strategy



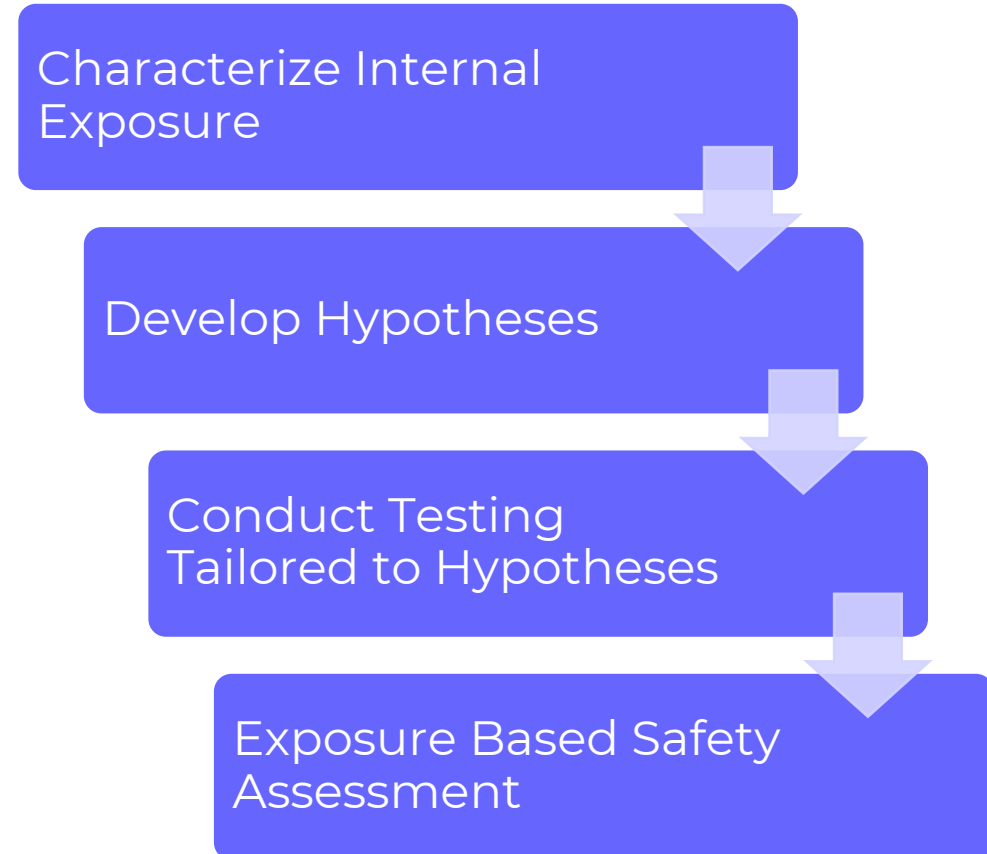
- If there is **no** bioactivity observed at consumer-relevant concentrations, there can be no adverse health effects.
- If there **is** bioactivity observed at consumer-relevant concentrations, follow up testing is required to establish if that could result in an adverse effect.
- At no point does NGRA attempt to **predict** the results of high dose toxicology studies in animals.

Traditional approach compared with NGRA

Traditional Approach



Next Generation Risk Assessment



OXYBENZONE CASE STUDY



Oxybenzone: Objectives and Approach

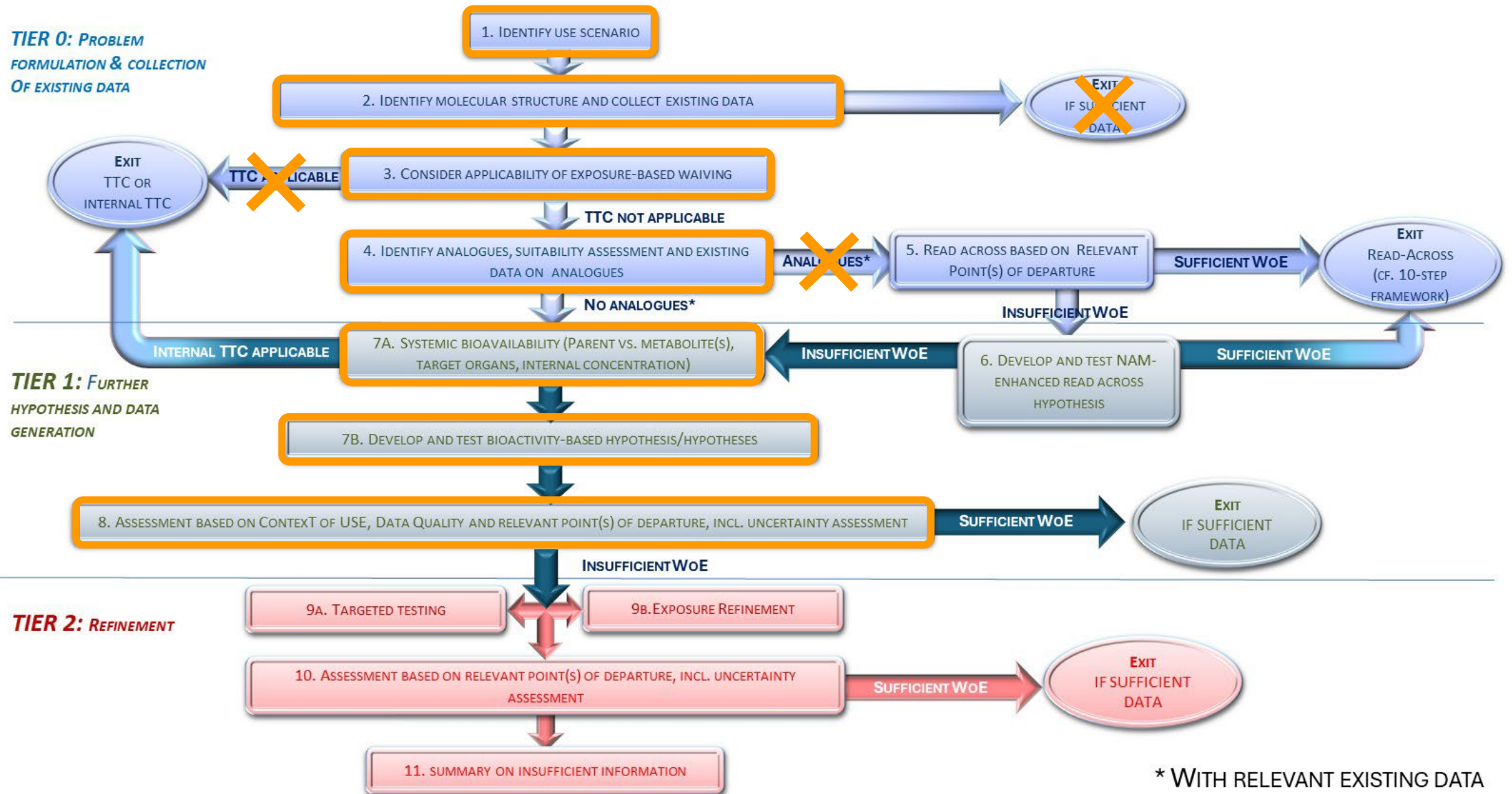
To illustrate the overall structure of an exposure-led, tiered NGRA approach to assess the safety of an active ingredient under regulatory scrutiny

Is Oxybenzone safe for consumers when used at up to 4% in a sunscreen product?

Oxybenzone: Rules and Assumptions

- For the purposes of this exercise, it has been assumed that **no *in vivo* animal data exist on the ingredient**
- **Stand-alone illustration of how to assess systemic, developmental and reproductive effects** (not including genetic toxicity) **using NAMs**
 - Data shared today are from existing published sources
 - A comprehensive NGRA with new data generated by ICCS and led by colleagues at L'Oréal is being developed

Oxybenzone: Overall approach



Oxybenzone: Use Scenario

- Oxybenzone (CAS 131-57-7) has been used in sunscreen products in many geographies for decades. In the EU it is approved for use at up to 2% and in the USA at up to 6%.
- The specific use scenario of this case study is for **dermal application** of a **leave-on sunscreen formulation containing oxybenzone at up to 4%, applied over 75% of the body surface area** at a dose of 2 mg/cm²*

*Golbamaki et al., 2025, Pharmaceuticals 18(11)1607) - Repeat exposure of one application on Day 1, followed by four applications per day on Days 2–4 with a 2 h interval modelled

Oxybenzone: Exposure Estimation

From applied dose to internal concentrations

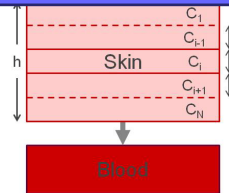
External dose

- Route of exposure
- Consumer use (Habits & Practices)
- Applied dose (external concentration)



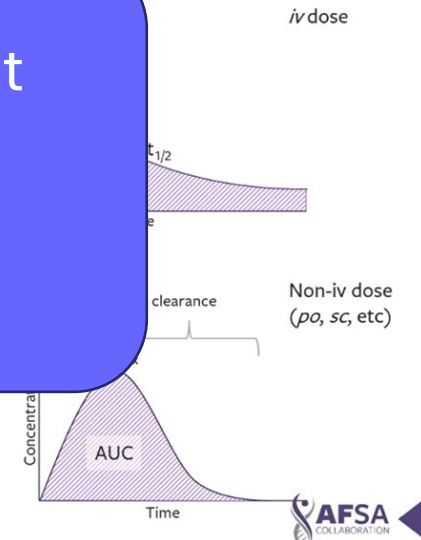
ADME parameters

Absorption
Distribution
Metabolism
Elimination



Kinetic profile of chemical

Physiologically-based kinetic (PBK) modelling
– Internal concentration (plasma, urine, organ-level)



Images from: AFSA training module
“Dosimetry (Internal Exposure)”, 2022

Predicted plasma exposure following repeat exposure = $0.56 \mu\text{M}$

Golbamaki et al., 2025, Pharmaceuticals 18(11)1607

Oxybenzone: Bioactivity NAMs

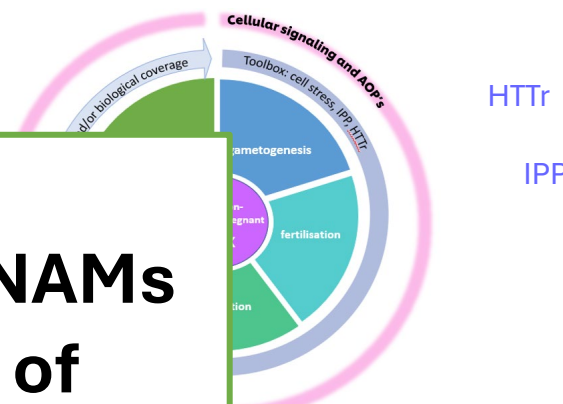
In vitro pharmacological profiling



EATS assays

Developmental Assays

Induced pluripotent stem cell assays



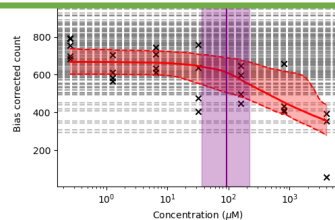
This combination of bioactivity NAMs provides conservative points of departure for systemic, developmental and reproductive toxicity

2022. Front Toxicol. 4:838466

High-Throughput

- TempO-seek technology panel
- 24hr exposure
- 7 concentrations
- Cell models: HepG2, MCF7, HepaRG and others
- Dose-response analysis using BMDEpress2 and BIFROST model

Cable et al., 2025 Toxicol Sci 204(1)79-95
Mueller et al., 2025 Front Toxicol 7:1602065



Reynolds et al. 2020. Comp Tox 16: 100138
Baltazar et al. 2020. Toxicol Sci 176(1): 236-252

- 8 concentrations
- Dose-response analysis using BIFROST model

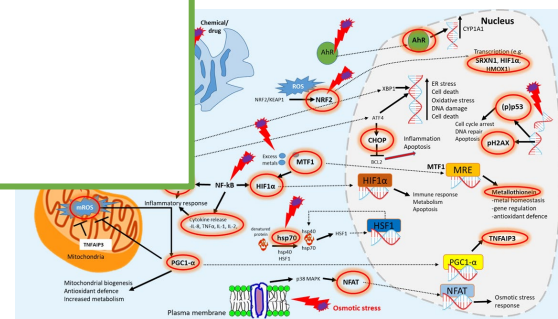


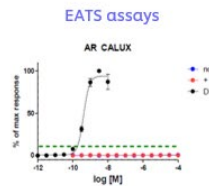
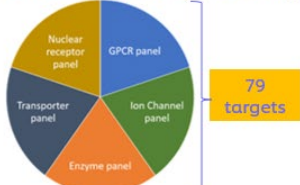
Image kindly provided by Paul Walker (Cyprotex)

Hatherell et al. 2020. Toxicol Sci 176(1): 11-33

Bioactivity Exposure Ratios (BER)

BIOACTIVITY

In vitro pharmacological profiling



Burbank et al., 2024 Tox Appl Pharmacol 492: 117131

Developmental Assays

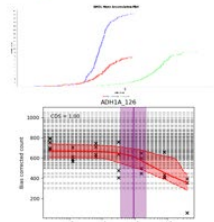
Induced pluripotent stem cell assays



Rajagopal et al. 2022. Front Toxicol. 4:838466

High-Throughput transcriptomics

- TempO-seek technology – full gene panel
- 24hr exposure
- 7 concentrations
- Cell models: HepG2, MCF7, HepaRG and others
- Dose-response analysis using BMDExpress2 and BIFROST model



Reynolds et al. 2020. Comp Tox 16: 100138
Baltazar et al. 2020. Toxicol Sci 176(1): 236–252

Cell stress panel (CSP)

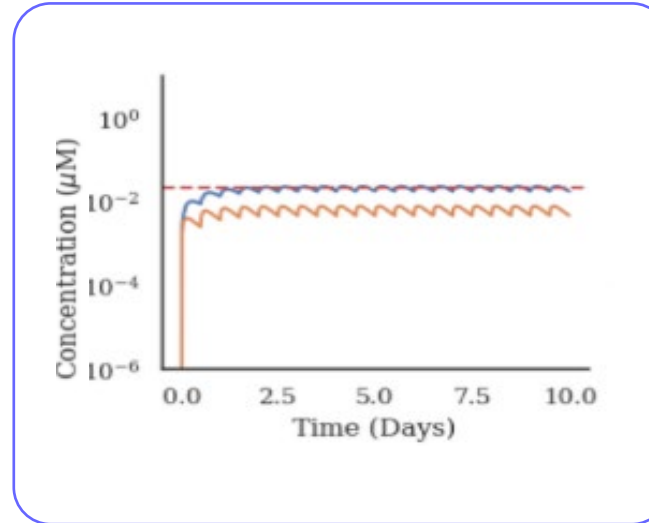
- 36 biomarkers covering 10 cell stress pathways
- HepG2
- 24hr exposure
- 8 concentrations
- Dose-response analysis using BIFROST model



Image kindly provided by Paul Walker (Cyprotex)
Hatherell et al. 2020. Toxicol Sci 176(1): 11-33

Identify relevant point of departure (PoD), expressed in μM

EXPOSURE



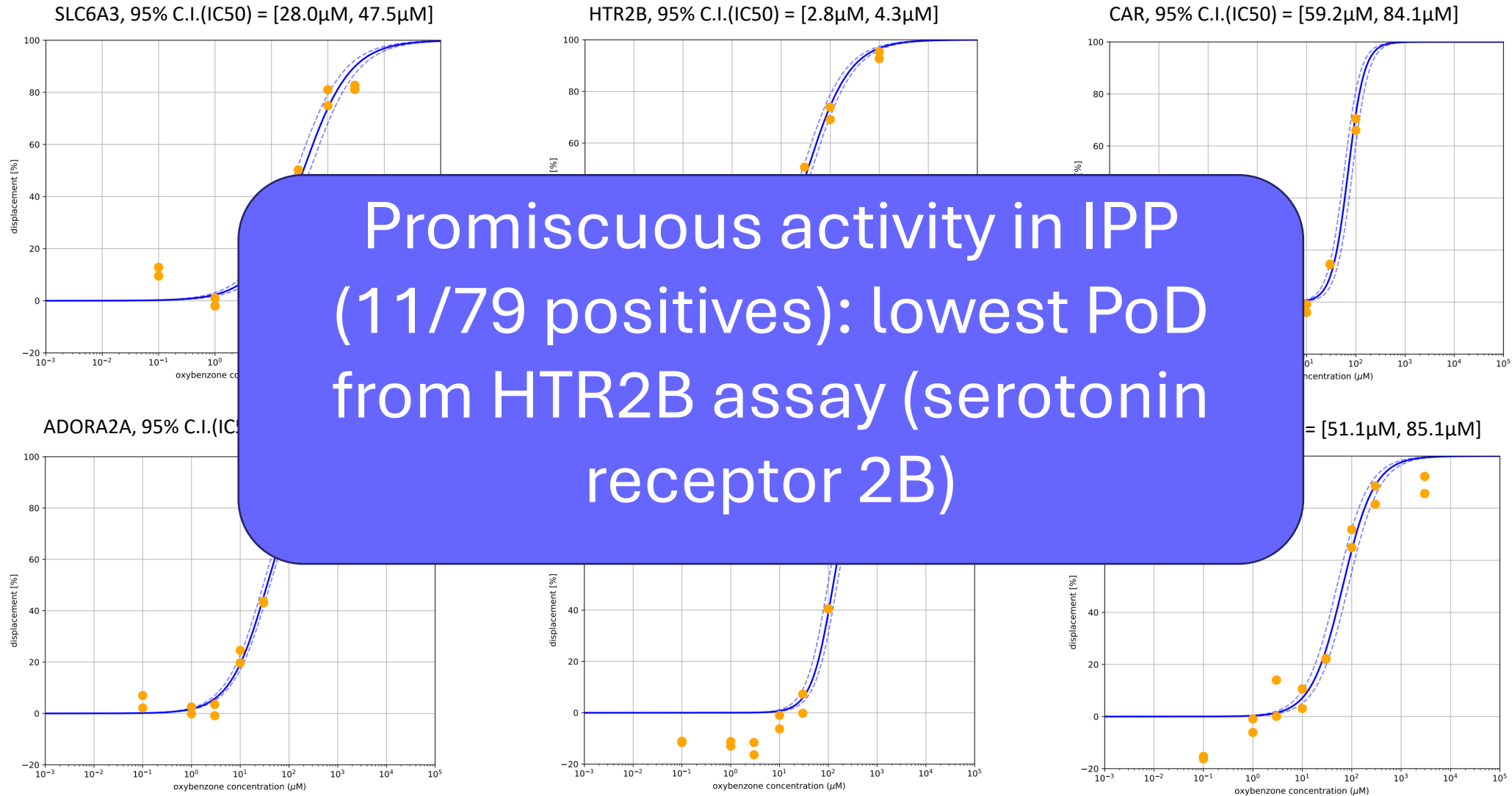
Identify realistic worst-case plasma exposure (C_{max}) expressed in μM

BIOACTIVITY EXPOSURE RATIO (BER) =

$$\frac{\text{BIOACTIVITY}}{\text{EXPOSURE}}$$

The bigger the BER, the greater the confidence that bioactivity will not occur in exposed population

Oxybenzone: Key results – pharmacological profiling

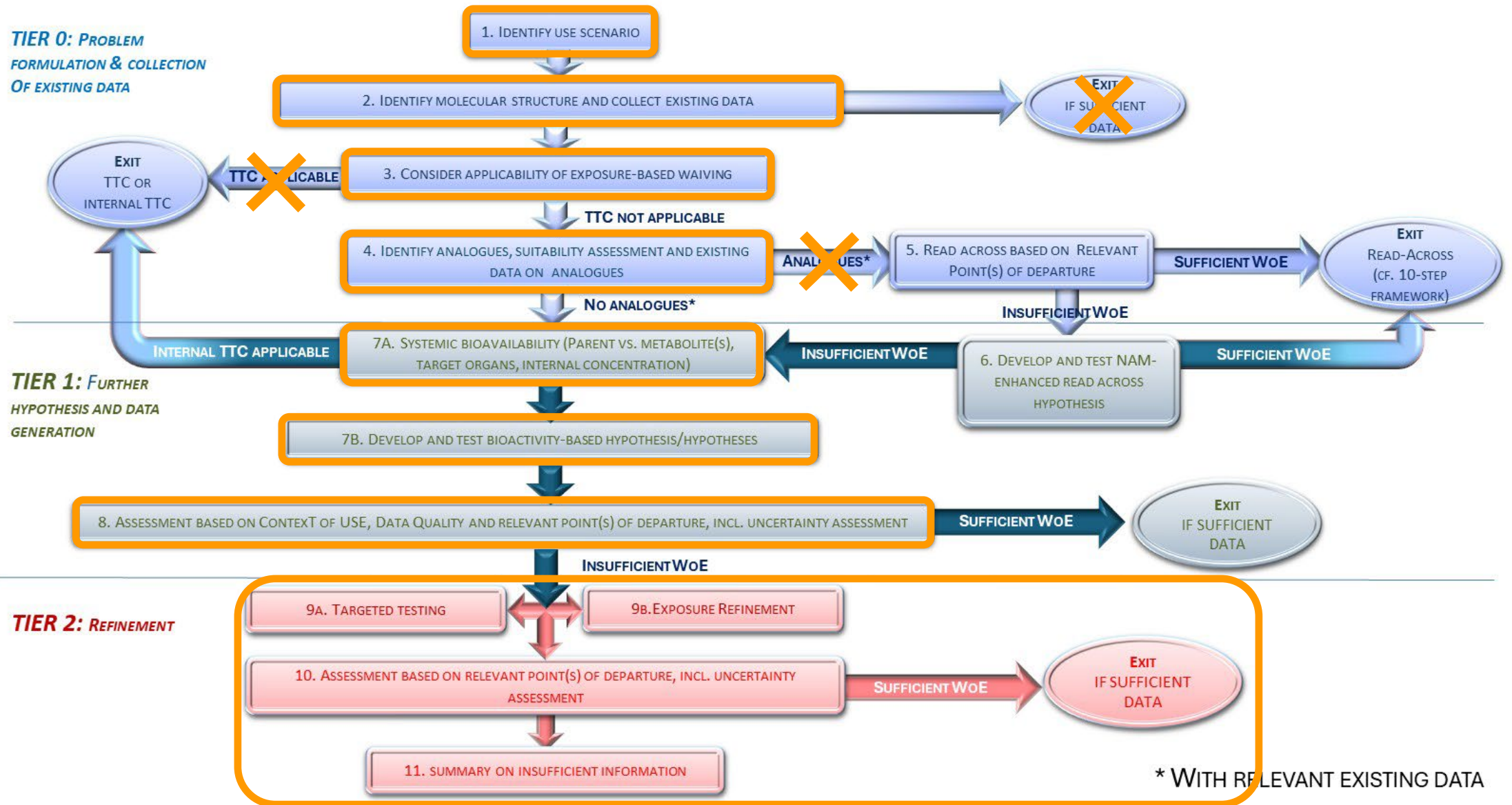


Oxybenzone: Some illustrative PoDs and BERs

Cell Type	PoD type	PoD	BER
-	IPP Lowest AC ₅₀	2.8	5.0
HepG2	Cell Stress	9.2	16.5
HepaRG	Gene level HTTr	4.9	8.7
HepG2	Gene level HTTr	6.3	11.3
MCF-7	Gene level HTTr	0.7	1.2
HepaRG	Pathway BMDL ₁₀	91.8	163.7
HepG2	Pathway BMDL ₁₀	35.7	63.7
MCF-7	Pathway BMDL ₁₀	22.3	39.7

AREG:
transmembrane
glycoprotein involved
in signalling pathways
related to cell growth
and differentiation

Oxybenzone: Overall approach



* WITH RELEVANT EXISTING DATA

Conclusions and Reflections

- An exposure-led framework is needed to unlock the full potential of NAMs for safety decision making.
- NGRA allows protective (often very conservative) safety decisions to be made.
- Tiering is critical: bioactivity vs. adversity.
- Confidence can be built in the use of NAMs through application to real world safety decisions.



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Thank You