Advancing the Application of New Approach Methodologies (NAMs) for **Systemic Toxicity Assessment of cosmetic** ingredients: an example with UV filters











Dr Predrag Kukic, Unilever SERS, UK







Benzophenone-4 (BP-4) case study: Objectives & Approach

- In 2019, the European Commission defined a list of 28 cosmetic ingredients with potential endocrine activity
- BP-4 is one of the 28 chemicals for which the call for data took place
- BP-4 is an UV-filter ingredient used in sunscreen cosmetics to prevent sunburns or photodegradation by inhibiting the infiltration of UV light

O OH O CH₃

CAS No. 4065-45-6; EC No. 223-772-2; sulisobenzone; 2-Hydroxy-4methoxybenzophenone-5sulphonic acid)

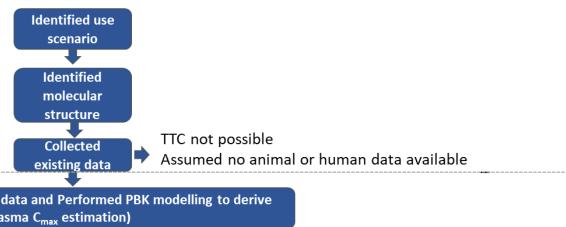
Objective of the case study:

- To assess whether a tiered NGRA approach is sufficiently protective and also useful to answer a real-life question
- For the purposes of this exercise, it has been assumed that no in vivo animal data exist on the ingredient
- Focus on systemic toxicity (excluding genetic toxicity or DART) using NAMs



Is Benzophenone-4 safe in a sunscreen product at the maximum approved level of 5%?





Module 1- Exposure estimation

Generated in vitro ADME data and Performed PBK modelling to derive plasma C_{max} estimation)

Generic hypothesis: Biological activity measured using a broad suite of human-relevant test systems is sufficiently protective. If bioactivity is not observed at concentrations experienced systemically in consumers, then there are no adverse effects. PBK model indicated that concentrations of BP-4 are limited to liver and kidney, therefore a relevant kidney cell model was included in the testing strategy in addition to the already liver cell line. In silico tools predicted binding to estrogen receptor.

Module 2-**Bioactivity** characterisation

Systemic NAM-toolbox^{1,2}

Broad suite of assays and analysis used as part of the systemic toolbox as outlined in Middleton et al:

- Cell stress panel (CSP) in HepG2 cells
- In vitro pharmacological profiling (IPP)³
- · High-Throughput transcriptomics (HTTr) in HepG2, HepaRG, MCF-7 cells

EATS activity: estrogenic, androgenic, thyroidogenic and steroidogenesis using **CALUX** assays

Investigated BP-4 toxicity in the primary human proximal tubule model (aProximate™)

Tools to address specific risk assessment questions

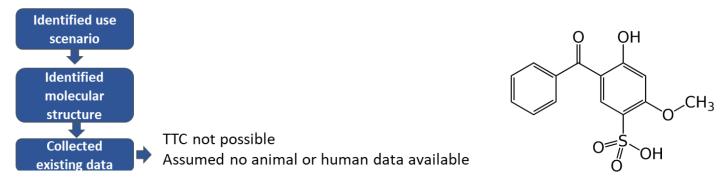
Module 3- Risk characterisation

Calculation of Bioactivity-Exposure ratio (BER). Assessment based on lowest of POD_{NAM} together with weight of evidence



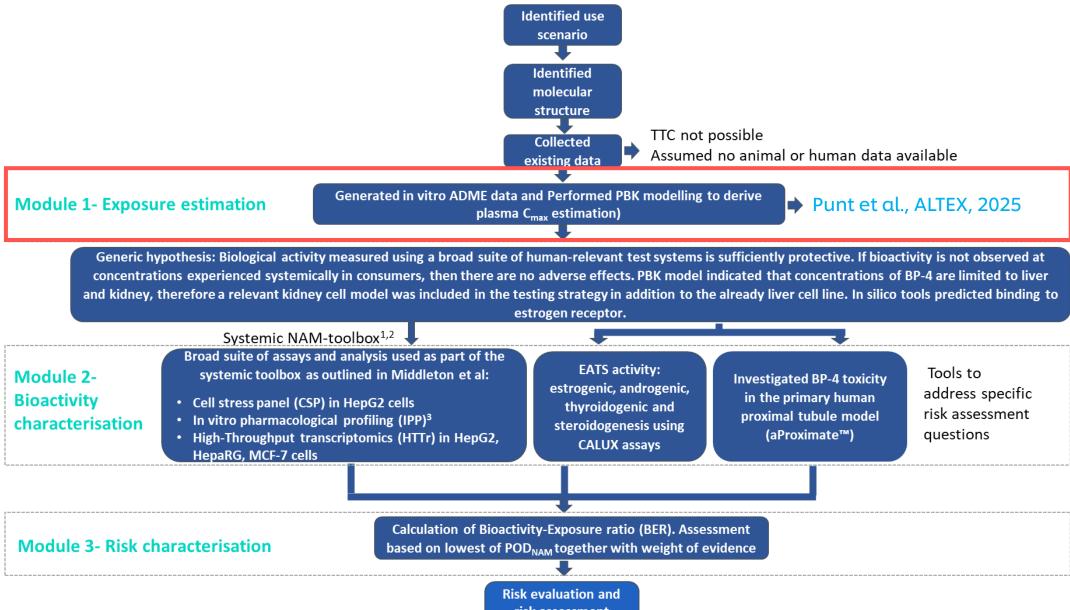
Risk evaluation and risk assessment documentation





| Tool | Output |
|-------------------|--|
| DEREK Nexus | Alerts for skin sensitization, photoallergenicity, and carcinogenicity. |
| METEOR Nexus | Very few predicted metabolites for BP-4 |
| OECD QSAR Toolbox | BP-4 was predicted to have a low order of toxicity, with none of the models predicting DNA binding. Mixed alerts for protein binding. No alerts with respect to developmental and reproductive toxicity. |
| OPERA | No alerts for androgen receptor or estrogen receptor agonism or antagonism. |
| VEGA | No alerts for androgen receptor binding; possible estrogen receptor activity; predicted non-developmental and reproductive toxicant. |







risk assessment documentation

Module 1: steps to estimate internal exposure

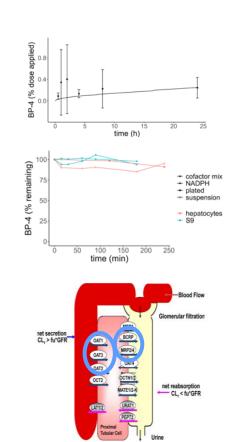
Exposure scenario (applied dose)

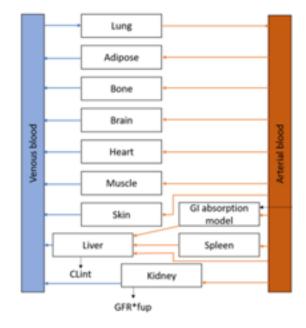
- 5% in Sunscreen product,
- 18g/day, two times, 9g/application (as per SCCS notes of guidance)
- On body and face 17500cm2 (total body area)

ADME data for model building

- Limited dermal absorption (0.4%)
- Stable in primary human hepatocytes and S9 fraction (liver metabolism is negligible)
- BP-4 is a substrate of OAT1, OAT2, OAT3, BCRP, and MRP4 which indicates BP-4 is mainly secreted.
- In contrast, BP-4 was not found to be a substrate of transporters involved in reabsorption (movement from urine to blood).

Limited membrane permeability (from PAMPA assay)



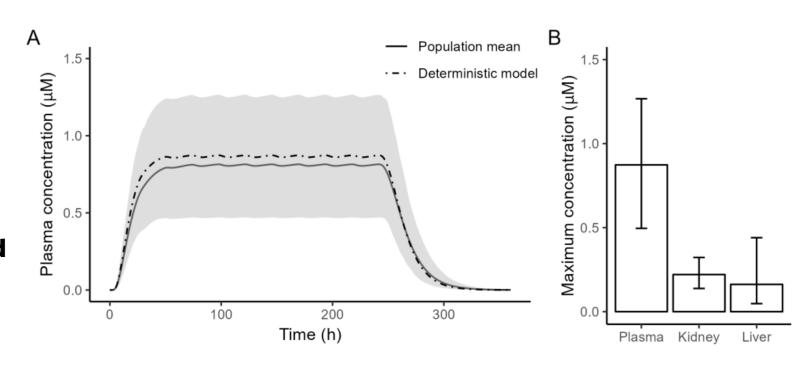




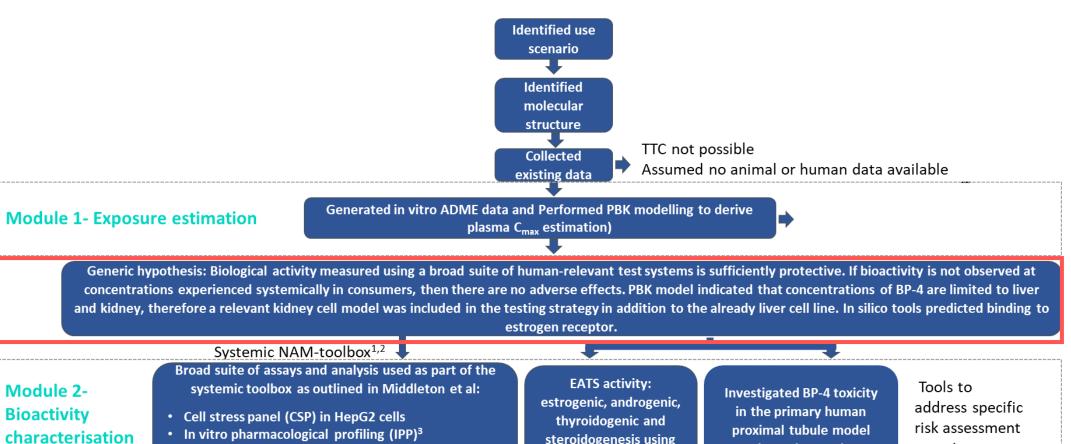


Module 1: plasma Cmax prediction for the population

- Mean population plasma Cmax of 0.9 μM (5th and 95th percentile of 0.4 and 1.24 μM, respectively)
- The influx rates of OAT1, OAT2, and OAT3 were higher than the efflux rates of BCRP and MRP4, leading to substantial concentrations within the liver (0.23 μM) and kidney (0.17 μM).
- Limited distribution to any other organ







 High-Throughput transcriptomics (HTTr) in HepG2, HepaRG, MCF-7 cells

steroidogenesis using **CALUX** assays

(aProximate™)

questions

Module 3- Risk characterisation

Calculation of Bioactivity-Exposure ratio (BER). Assessment based on lowest of POD_{NAM} together with weight of evidence

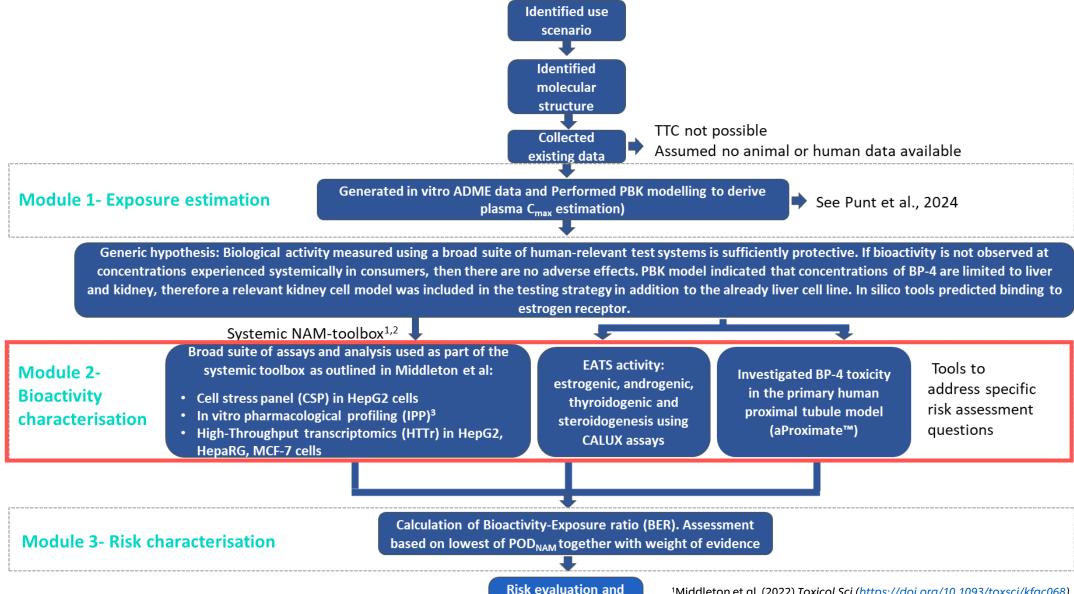


Risk evaluation and risk assessment documentation

Problem formulation after collating existing information and exposure estimation

| Hypothesis | Testing strategy |
|---|---|
| • Absence of in silico αlerts ≠ no toxicity | Test the Systemic NAM Toolbox using non targeted (transcriptomics in HepG2, HepaRG, MCF7, cell stress panel) & targeted NAMs (in vitro pharmacological profiling) |
| Cell models previously tested (HepG2, HepaRG and MCF-7) might lack the transporters involved in BP-4 organ distribution | Literature review of cell lines expressing the key transporters Addition of a primary proximal tubule cell model to evaluate BP-4 bioactivity. |
| Potential underestimation of bioactivity | |
| BP-4 distribution to only kidney and liver | |
| BP-4 could bind to estrogen receptor (VEGA in silico tool flagged a potential binding to estrogen receptor) | • In vitro CALUX® EATS (estrogenic, androgenic, thyroidogenic and steroidogenesis |





documentation



risk assessment

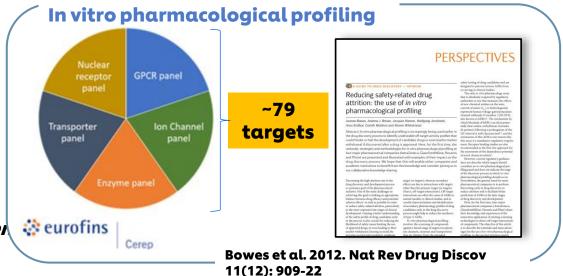
¹Middleton et al. (2022) Toxicol Sci (https://doi.org/10.1093/toxsci/kfac068)

²Cable et al., (submitted)

³The present work contains additional targets and assays not included in the Middleton et al., 2022 and Cable et al., 2024 publications

Module 2: Broad suite of assays and analysis used as part of the systemic toolbox

Transcriptomics was applied as a broad nontargeted biological screen



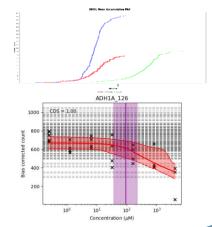
To investigate specific biological activity with 44 key targets involved in drug attrition (Pharma) and additional targets relevant to exposure to cosmetics-

now expanded to 79 targets

To characterize non-specific biological activity which is not mediated via a specific Cell stress panel (CSP) protein/receptor interaction

High-Throughput transcriptomics (HTTr)

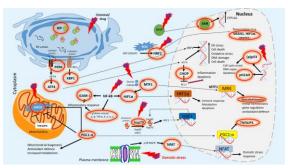
- TempO-seq technology full gene panel
- 24hr exposure
- 7 concentrations
- HepG2, MCF7, HepaRG
- Dose-response analysis using **BMDExpress2** and BIFROST model



 Dose-response analysis using BIFROST model



- HepG2
- 24hr exposure
- 8 concentrations
- Image kindly provided by Paul Walker (Cyprotex)





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

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

Module 2: Tools to address specific risk assessment questions

EATS activity: estrogenic, androgenic, thyroidogenic and steroidogenesis

- CALUX bioassays to measure transcriptional activation and binding assays:
 - U2-OS incorporating the firefly luciferase reporter gene coupled to Responsive Elements (REs)
 - ERα, AR, TTR-TRβ- and hTPO
- In vitro H295R Steroidogenesis Assay (H295R) utilises human adenocarcinoma cell line NCI-H295R. Quantification of 17β-estradiol and Testosterone is performed using the AR CALUX and ERα CALUX bioassays
- 12 concentrations. Calculation of AC50, LOEC and NOEC

Renal Toxicity

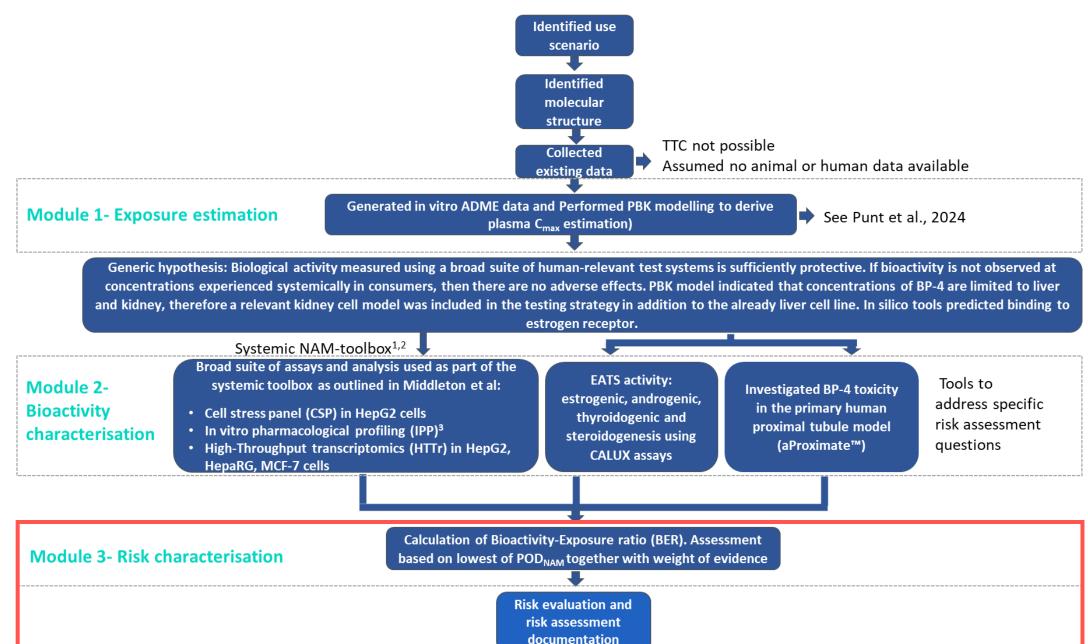
Renal biomarkers (3 donors, duplicate per donor), 8 concentrations, 24h and 72h timepoints in primary proximal tubule cell:

Newcells aProximate™ platform

- KIM-1
- NGAL
- Clusterin
- TEER (Day 0 and Day 3)
- **ATP**
- LDH
- Toxicogenomics (3 donors, 2 duplicates per donor), 8 concentrations, 24h and 72h timepoints
- Omeprazole and cisplatin added as benchmarks/positive controls

Piyush Bajaj et al. 2020. Toxicology. 442, 152535

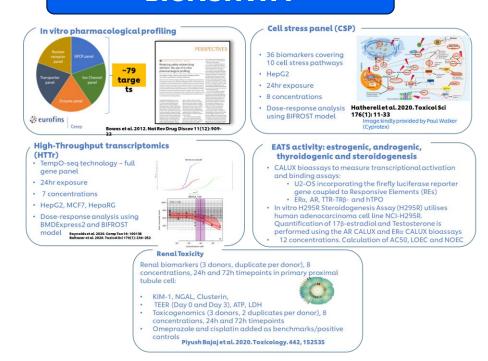






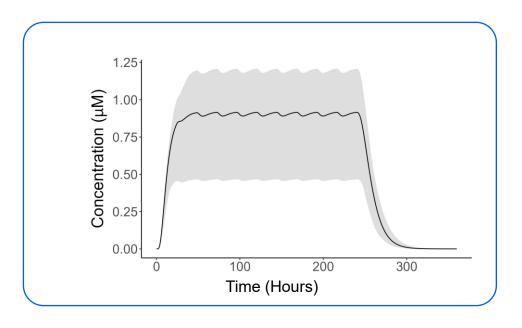
Module 3- Risk characterisation

BIOACTIVITY



Identify lowest (most sensitive) point of departure, expressed in µM

EXPOSURE



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

occur in exposed consumers

The bigger the BER, the greater the confidence that bioactivity will not

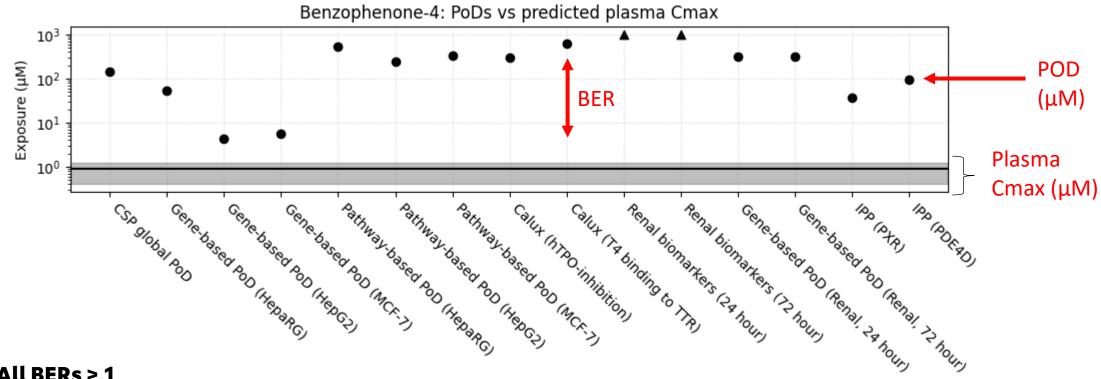
EXPOSURE



BIOACTIVITY EXPOSURE RATIO =

BIOACTIVITY

Bioactivity: exposure ratio calculation: BER ranging from 3.4-508



- All BERs > 1
- **Lowest BER (3.4):** PODs was obtained from HTTr in HepG2 cells when the BIFROST method was used (POD of 4.2 µM). BER obtained from pathway level POD was 193.



Highest BER (508): PODNAM derived from the Calux assay (T4 binding to TTR).

When is a BER sufficiently protective?

Conceptually, with the following assumptions a BER>1 indicates a low risk of adverse effects in consumers following use of the product:

- The in vitro measures of bioactivity provide appropriate biological coverage
- There is confidence that the test systems are at least as sensitive to perturbation as human cells in vivo
- The exposure estimate is conservative for the exposed population



Conclusions & reflections

NAM-based assessment for 5% inclusion of BP-4



Lowest BER= 3.4 **BER range= 3.4-508**



Conclusion

Low risk considering weight of evidence and model/PoD relevance

Traditional animal assessment for 5% inclusion of BP-4



NOAEL= 1239 mg/kg bw/day

Adjusted for oral absorption= 620 mg/kg bw/day

Exposure= 0.069 mg/kg bw/d

Margin of Safety (MoS)= 8986



Conclusion

Low risk - MoS >> 100

(SCCS opinion)

NAM-based risk assessments are in generally more conservative than traditional approaches

- Cable et al (2025) Tox Sci (https://doi.org/10.1093/toxsci/kf ae159)
- Middleton et al. (2022) Toxicol Sci (https://doi.org/10.1093/toxsci/kf ac068)
- Reardon A et al., 2023 https://doi.org/10.3389/ftox.2023. 1194895
- Zobl et al., 2023 http://dx.doi.org/10.14573/altex.2 309081
- Paul-Friedman K et al., 2020: https://doi.org/10.1093%2Ftoxsci %2Fkfz201
- Baltazar MT et al., 2020: http://dx.doi.org/10.1093/toxsci/k faa048
- Ebmeyer et al., 2024: https://doi.org/10.3389/fphar.202 4.1345992



Acknowledgments

Matt Dent Hegun Li Ans Punt Sophie Cable **Nicky Hewitt Beate Nicol** Joe Reynolds Sophie Malcomber **Sharon Scott** Jade Houghton **Predrag Kukic Andrew White** Richard Cubberley **Sandrine Spriggs Ruth Pendlington** Katie Przybylak **Alistair Middleton**

BP4 Consortium Cosmetics Europe/LRSS Case study Leaders Team **Pharmacelsus Eurofins BioClavis** Cyprotex **SOLVO BioDetection Systems NewCells**





ALTEX. 2025;42(3):511-530. doi: 10.14573/altex.2501201. Epub 2025 May 19.

Making safety decisions for a sunscreen active ingredient using next-generation risk assessment: Benzophenone-4 case study

Maria T Baltazar ¹, Sophie Cable ¹, Richard Cubberley ¹, Nicola J Hewitt ², Jade Houghton ¹, Predrag Kukic ¹, Hegun Li ¹ ³, Sophie Malcomber ¹, Beate Nicol ¹, Ruth Pendlington ¹, Ans Punt ¹, Joe Reynolds ¹, Sharon Scott ¹, Sandrine Spriggs ¹, Matthew P Dent ¹

Affiliations + expand

PMID: 40396742 DOI: 10.14573/altex.2501201



Thank You



sers.unilever.com

