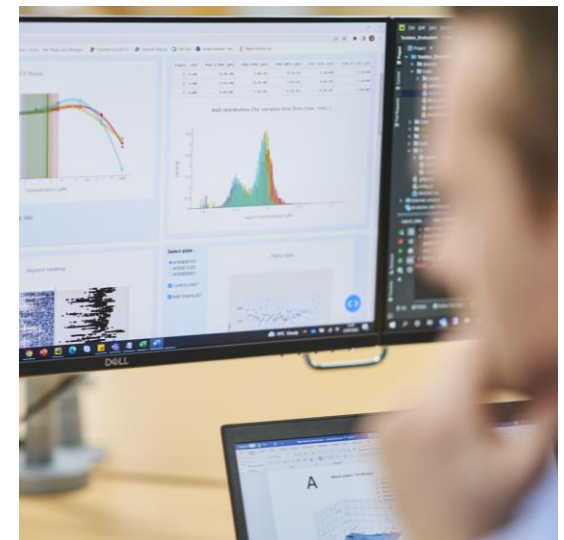


# Application of a next generation risk assessment framework for skin sensitisation using new approach methodologies (NAMs)

**Dr Renato Ivan de Ávila**

Scientist – Human Safety

Unilever Safety and Environmental Assurance Centre (SEAC)



**SÉRIE DE WEBINARS EM CIÊNCIA IN VITRO**

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INSCRIÇÃO

Atualizações em novas abordagens metodológicas aplicadas à segurança humana e ambiental

**EVENTO ONLINE GRATUITO EM PORTUGUÊS**

04/12/2023 15:00 – 16:30  
UTC/GMT, HORÁRIO DE BRASÍLIA

**TÓPICOS:**

Biomateriais e tecnologias avançadas para o desenvolvimento de modelos 3D de cultivo celular in vitro

Estrutura de avaliação de risco de última geração para sensibilização dérmica usando novas abordagens metodológicas (NAMs)

Moderador:  
Prof. Artur Christian G. da Silva (Tox In/UFG)

Jordana Andrade Santos  
Tox In/UFG

Renato Ivan de Ávila  
Unilever

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# Agenda

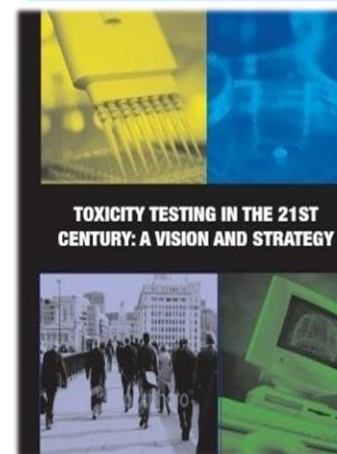
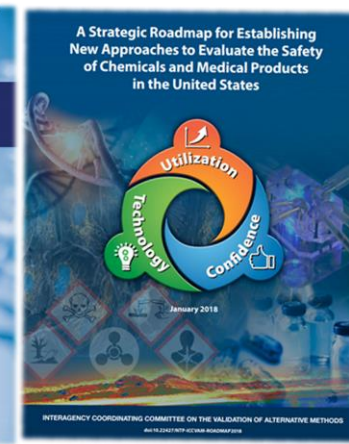
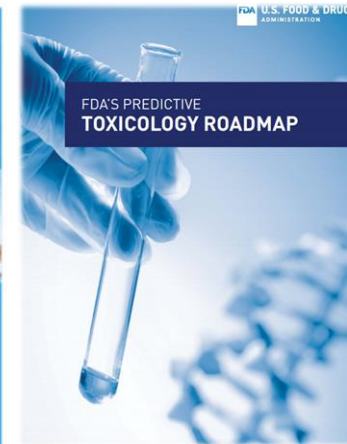
- Assessing ingredient & product safety without animal testing
- Skin allergy risk assessment evolution
- Use of Skin Sensitisation Adverse Outcome Pathway (AOP) to develop NAMs
- Next generation risk assessment (NGRA) framework for skin allergy
- Skin allergy Risk Assessment (SARA) model
- Case study: 0.02% (200ppm) geraniol in a face cream
- Conclusions & Next Steps

# Assessing ingredient & product safety without animal testing

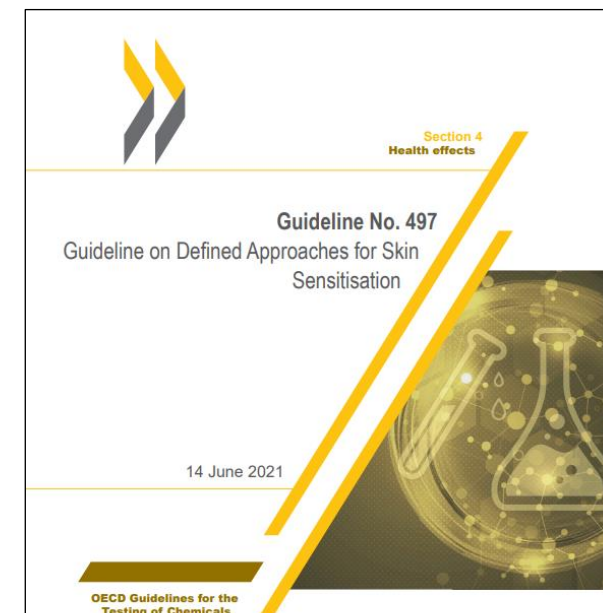
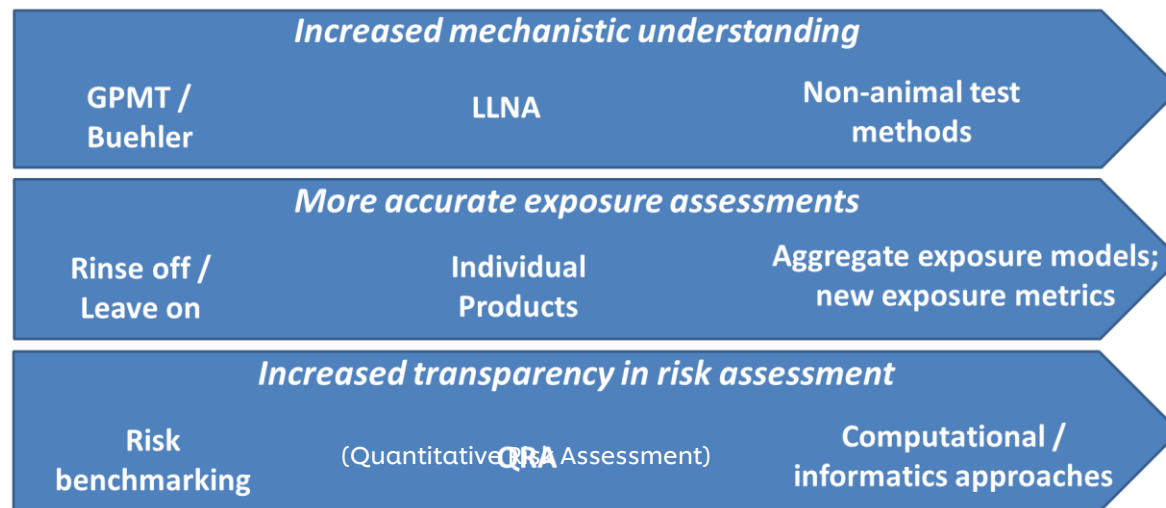
## Next Generation Risk Assessment (NGRA)



Is it safe to include x%  
of chemical y in  
product z?



# Skin allergy risk assessment evolution



## Defined Approaches (DAs):

- "2 out of 3" approach
- "Integrated Testing Strategy (ITS)" (v1-Derek Nexus and v2-OECD QSAR Toolbox)

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**ScienceDirect**  
 Regulatory Toxicology and Pharmacology 52 (2008) 1–23  
[www.elsevier.com/locate/yrtph](http://www.elsevier.com/locate/yrtph)

**Regulatory Toxicology and Pharmacology**

**Dermal sensitization quantitative risk assessment (QRA) for fragrance ingredients**

Anne Marie Api<sup>a,\*</sup>, David A. Basketter<sup>b,c</sup>, Peter A. Cadby<sup>d</sup>, Marie-France Cano<sup>d,e,2</sup>, Graham Ellis<sup>e</sup>, G. Frank Gerberick<sup>f</sup>, Peter Griem<sup>g</sup>, Pauline M. McNamee<sup>h</sup>, Cindy A. Ryan<sup>i</sup>, Robert Safford<sup>h</sup>

<sup>a</sup> Research Institute for Fragrance Materials, Inc., 30 The Boulevard, Woodcliff Lake, NJ, USA  
<sup>b</sup> Institute SEAC, Colworth House, Sharnbrook, Bedford MK44 1TQ, United Kingdom  
<sup>c</sup> Firmenich SA, Corporate Product Safety & Regulatory Affairs, Case postale 270, 1, Route de Jorandaire la Jonction, Geneva 8 CH-1211, Switzerland  
<sup>d</sup> ILMH, Fragrance Safety and Regulatory Affairs, 101 Avenue de Verdun, Saint Jean de Braye, Cedex 94304, France  
<sup>e</sup> GlaxoSmithKline, 5 Avenue de la performance, Vernier CH-1214, Switzerland  
<sup>f</sup> The Procter & Gamble Company, Miami Valley Laboratories, 11510 East Miami River Road, Cincinnati, OH 45222, USA  
<sup>g</sup> Clariant Produkte (Deutschland) GmbH, Corporate Product Safety, Am Dräger Park 1, 63484 Sandbach, Germany  
<sup>h</sup> The Procter & Gamble Technical Center Ltd, Whitehall Lane, Egham Surrey TW20 9NW, United Kingdom  
<sup>i</sup> P&G, 3700 Riverchase Parkway South, Birmingham, AL 35244, USA

Received 16 July 2007  
 Available online 24 October 2007

**Abstract**

Based on chemical, cellular, and molecular understanding of dermal sensitization, an exposure-based quantitative risk assessment (QRA) can be conducted to determine safe use levels of fragrance ingredients in different consumer product types. The key steps are: (1) determination of benchmarks (no expected sensitization induction level (NESIL); (2) application of sensitization assessment factors (SAF); and (3) consumer exposure (CEI) calculation through product use. Using these parameters, an acceptable exposure level (AEL) can be calculated and compared with the CEI. The ratio of AEL to CEI must be favorable to support safe use of the potential skin sensitizer. This ratio must be calculated for the fragrance ingredient in each product type. Based on the Research Institute for Fragrance Materials, Inc. (RIFM) Expert Panel's recommendation, RIFM and the International Fragrance Association (IFA) have adopted the dermal sensitization QRA approach described in this review for fragrance ingredients identified as potential dermal sensitizers. This new form of the fragrance industry's core strategy for primary prevention of dermal sensitization to these materials in consumer products. This methodology is used to determine global fragrance industry product management practices (IFA Standards) for fragrance ingredients that are potential dermal sensitizers. This paper describes the principles of the recommended approach, provides detailed review of all the information used in the dermal sensitization QRA approach for fragrance ingredients and presents key conclusions for its use now and refinement in the future.

**Keywords:** Quantitative risk assessment; Dermal sensitization; Fragrance ingredients; NESIL; SAF; AEL; CEI.

**1. Introduction**

Although some substances in common use today may have the potential to cause dermal sensitization, they can be formulated into consumer products at safe levels. This is also the case for fragrance ingredients.

IFA provides the fragrance industry with risk management strategies on the use of fragrance ingredients includ-

Regulatory Toxicology and Pharmacology 114 (2020) 104605

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**Updating exposure assessment for skin sensitization quantitative risk assessment for fragrance materials**

Anne Marie Api<sup>a,\*</sup>, David Basketter<sup>b</sup>, James Bridgess<sup>c</sup>, Peter Cadby<sup>d</sup>, Graham Ellis<sup>e</sup>, Nicola Gilmour<sup>f</sup>, Helmut Griesm<sup>g</sup>, Peter Griem<sup>h</sup>, Petra Kern<sup>i</sup>, John Khaier<sup>j</sup>, John O'Brien<sup>k</sup>, Thomas Rutenmeyer<sup>l</sup>, Cindy Ryan<sup>m</sup>, Bob Safford<sup>n</sup>, Benjamin Smith<sup>o,2</sup>, Matthias Vey<sup>o</sup>, Ian R. White<sup>o</sup>

<sup>a</sup> Research Institute for Fragrance Materials, Inc., 30 The Boulevard, Woodcliff Lake, NJ, USA  
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**Development of a next generation risk assessment framework for the evaluation of skin sensitisation of cosmetic ingredients**

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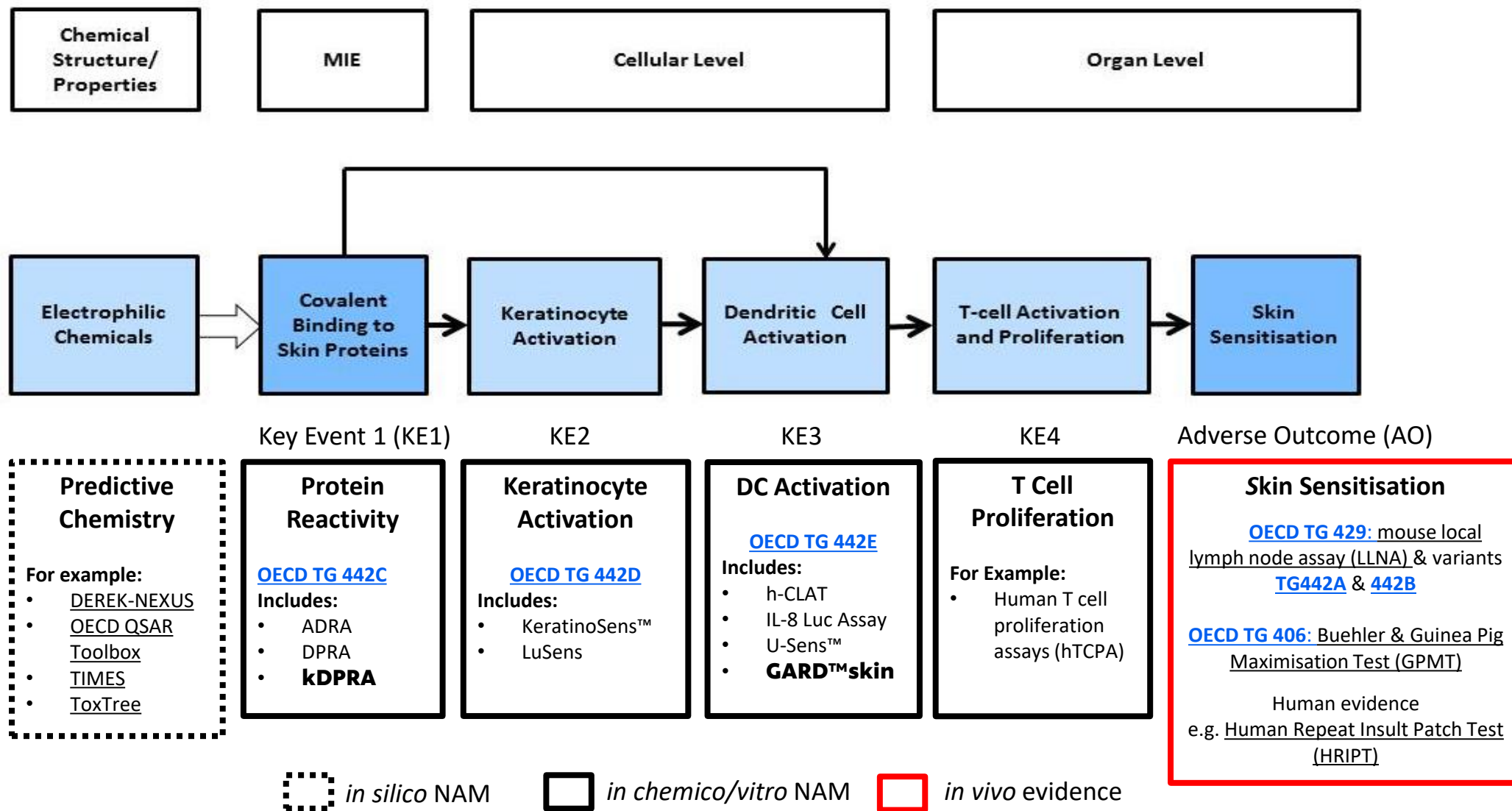
<sup>a</sup> Institute of Chemical Safety, Risk, Health, and Environment, 10000, United Kingdom  
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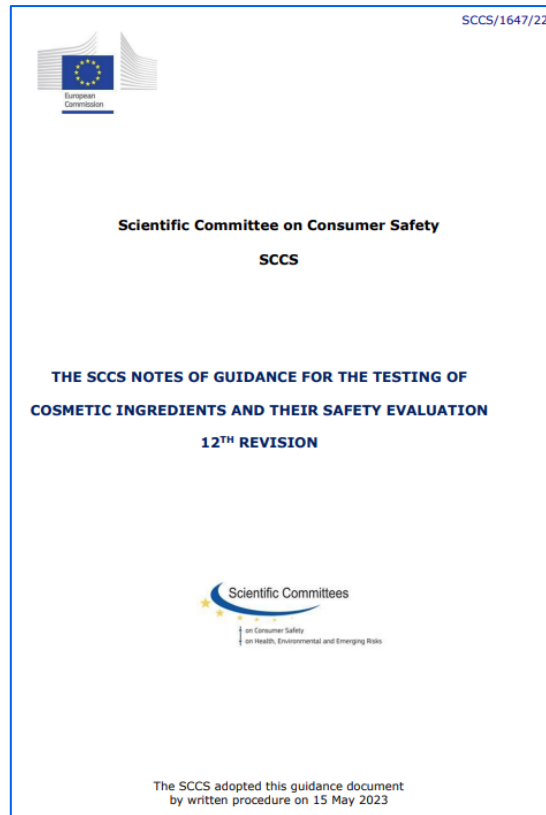
Development of a next generation risk assessment framework for the evaluation of skin sensitisation of cosmetic ingredients

# Success in skin allergy NGRA - NAMs aligned to skin sensitisation AOP

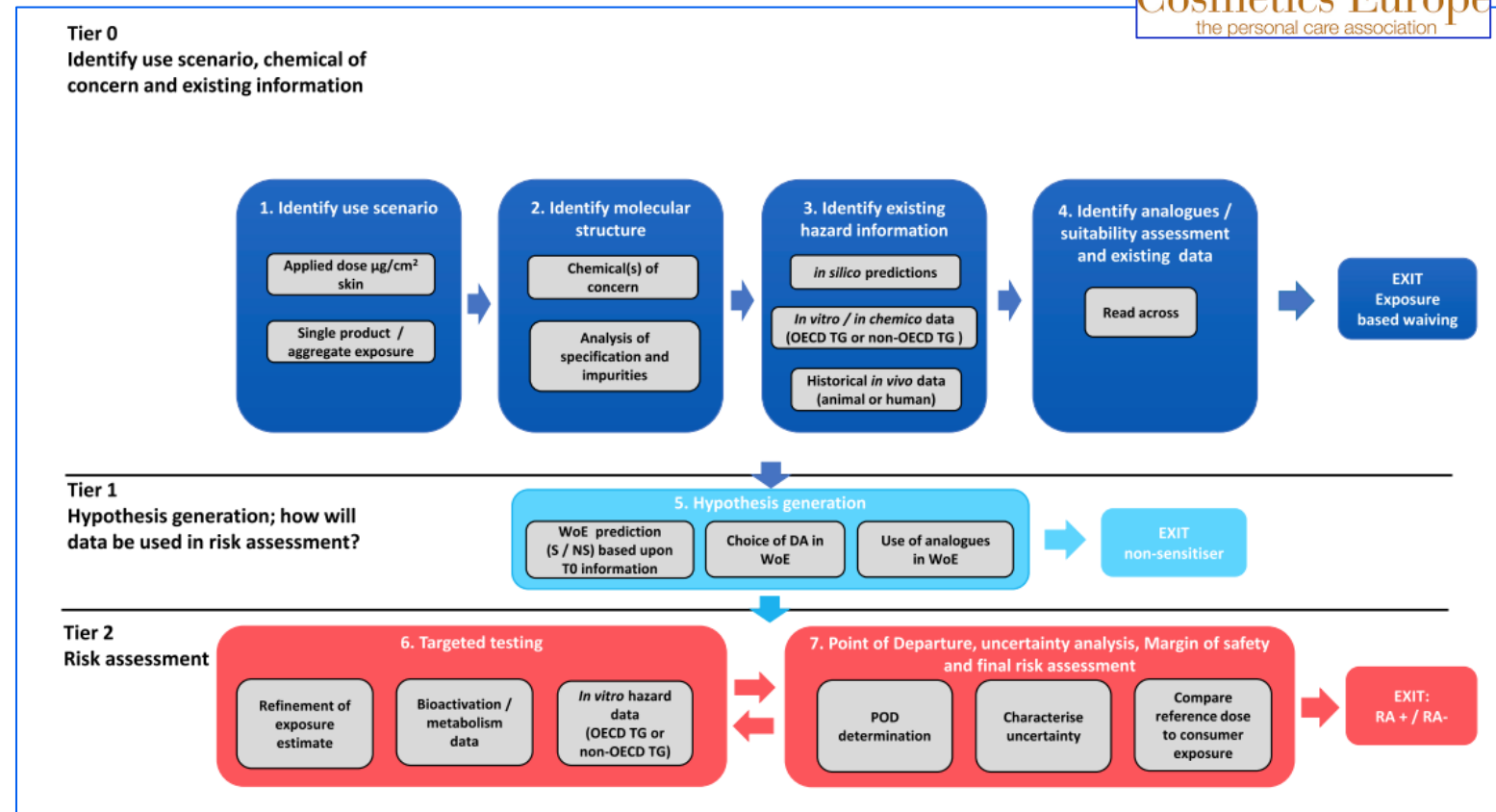


# Skin allergy risk assessment evolution

## SCCS 12<sup>th</sup> Notes of Guidance, 2023

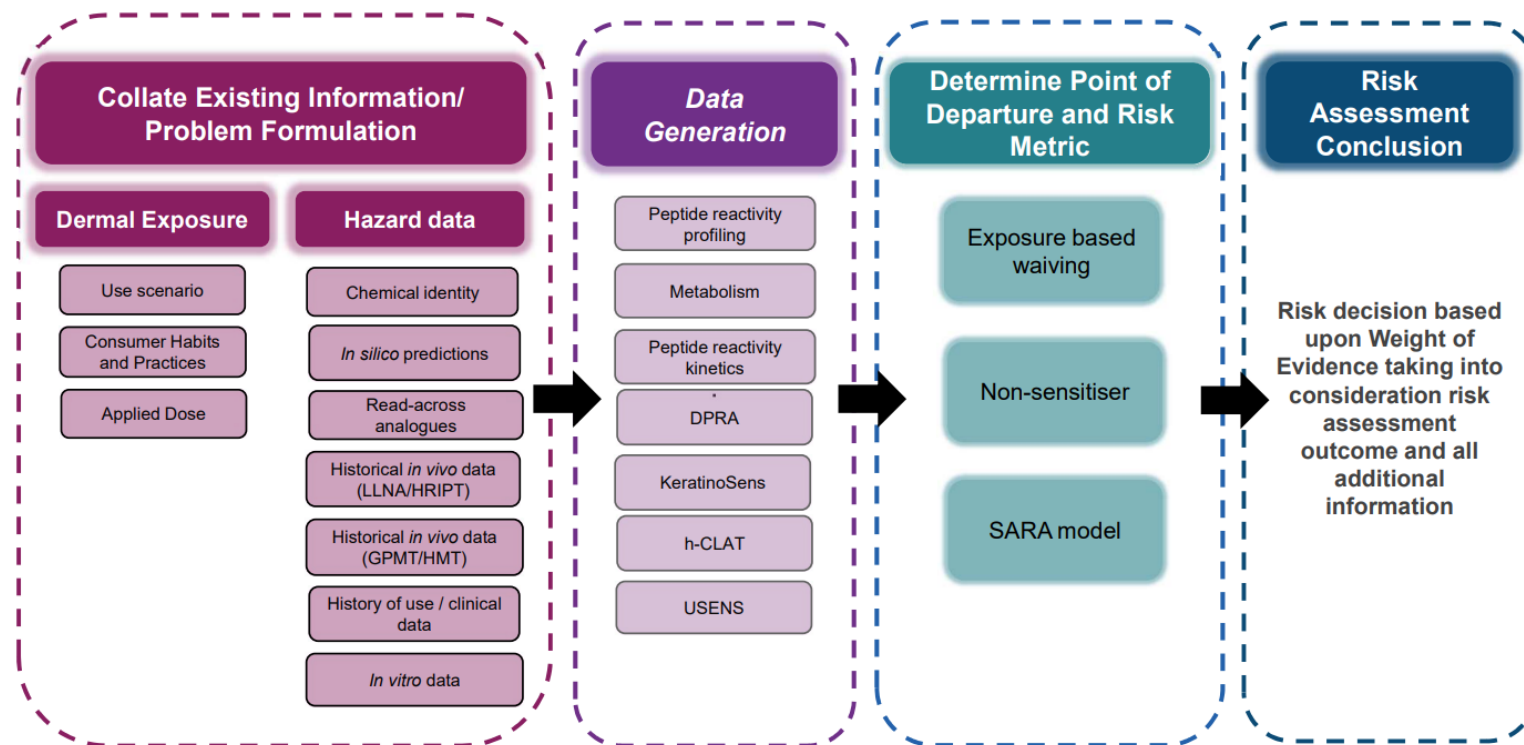


## Next generation risk assessment framework for skin sensitisation



Gilmour et al. Development of a next generation risk assessment framework for the evaluation of skin sensitisation of cosmetic ingredients. *Regul. Toxicol. Pharmacol.* 116, 2020.

# Next generation risk assessment (NGRA) framework for skin allergy



- Our NGRA framework for skin allergy is based upon the **International Cooperation on Cosmetics Regulation (ICCR) principles**<sup>1</sup> and the previously published **NGRA frameworks for systemic tox {Safety Evaluation Ultimately Replacing Animal Testing, SEURAT-1}**<sup>2</sup> and **skin allergy {Cosmetic Europe}**<sup>3</sup>.
- Designed to use a WoE based upon all available information, accommodates range of consumer product exposure scenarios and can provide a quantitative point of departure (PoD) and risk metric:  
→ **Skin Allergy Risk Assessment (SARA) Model**

<sup>1</sup>Dent et al. Principles underpinning the use of new methodologies in the risk assessment of cosmetic ingredients. *Comput. Toxicol.* 7, 20–26, 2018.

<sup>2</sup>Berggren et al. Ab initio chemical safety assessment: A workflow based on exposure considerations and non-animal methods. *Comput. Toxicol.* 4, 31–44, 2017.

<sup>3</sup>Gilmour et al.. Development of a next generation risk assessment framework for the evaluation of skin sensitisation of cosmetic ingredients. *Regul. Toxicol. Pharmacol.* 116, 2020.

Introduction to the

# Skin allergy Risk Assessment (SARA) model



# Skin Allergy Risk Assessment (SARA) model

## SARA Model Input Data Sources

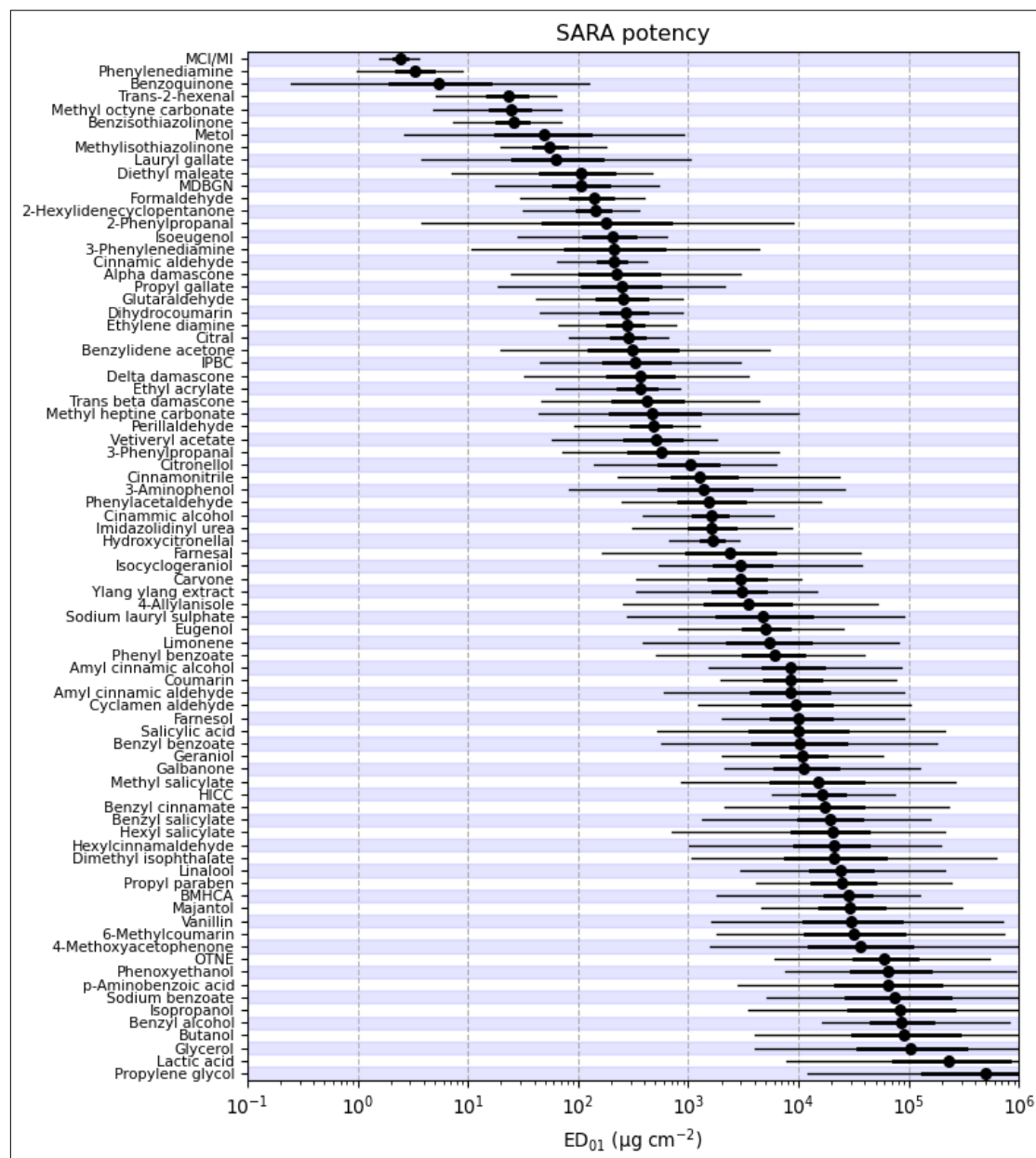
- ❖ Historical Local Lymph Node Assay (LLNA) data
- ❖ Historical Human Repeated Insult Patch Test (HRIPT) data
- ❖ *In vitro* data: DPRA (OECD TG442C), KeratinoSens™ (OECD TG 442D), h-CLAT (OECD TG 442E), U-SENS™ (OECD TG 442E)

## SARA Model Output Data Sources

- ❖ Point of Departure (PoD) termed the ED<sub>01</sub> – the expected dose at which there is a 1% chance of skin sensitisation in a human (HRIPT) population
- ❖ Risk metric – p(low risk) of a given chemical exposure

- **Defined approach (DA) to provide potency and risk information based upon NAMs**
- **A Bayesian statistical approach** which can make potency and risk predictions using any combination of **historical *in vivo* (LLNA, HRIPT) or NAMs (DPRA, KeratinoSens™, h-CLAT and U-SENS™)** – curated database of 81 chemicals
- **Skin sensitiser potency is expressed as the ED<sub>01</sub>**, the dose estimated to induce sensitisation in 1% of a HRIPT population. This is the **Point of Departure (PoD)** for the risk assessment.
- **Risk metric:** SARA model also makes use of **benchmark exposures to infer a probability that a consumer exposure to a chemical is 'low risk'**

# Potency across the SARA database - PoDs



This graph gives the ED<sub>01</sub> and quantified uncertainty (the dot with the 50% and 95% confidence intervals denoted by the thick and thin lines either side)

# Use of consumer exposure information and clinical evidence to develop skin allergy risk benchmarks

**62 low or high risk benchmark exposures** using 10 human skin allergens (e.g. MCI/MI) with an established history of use in 7 cosmetic product types.

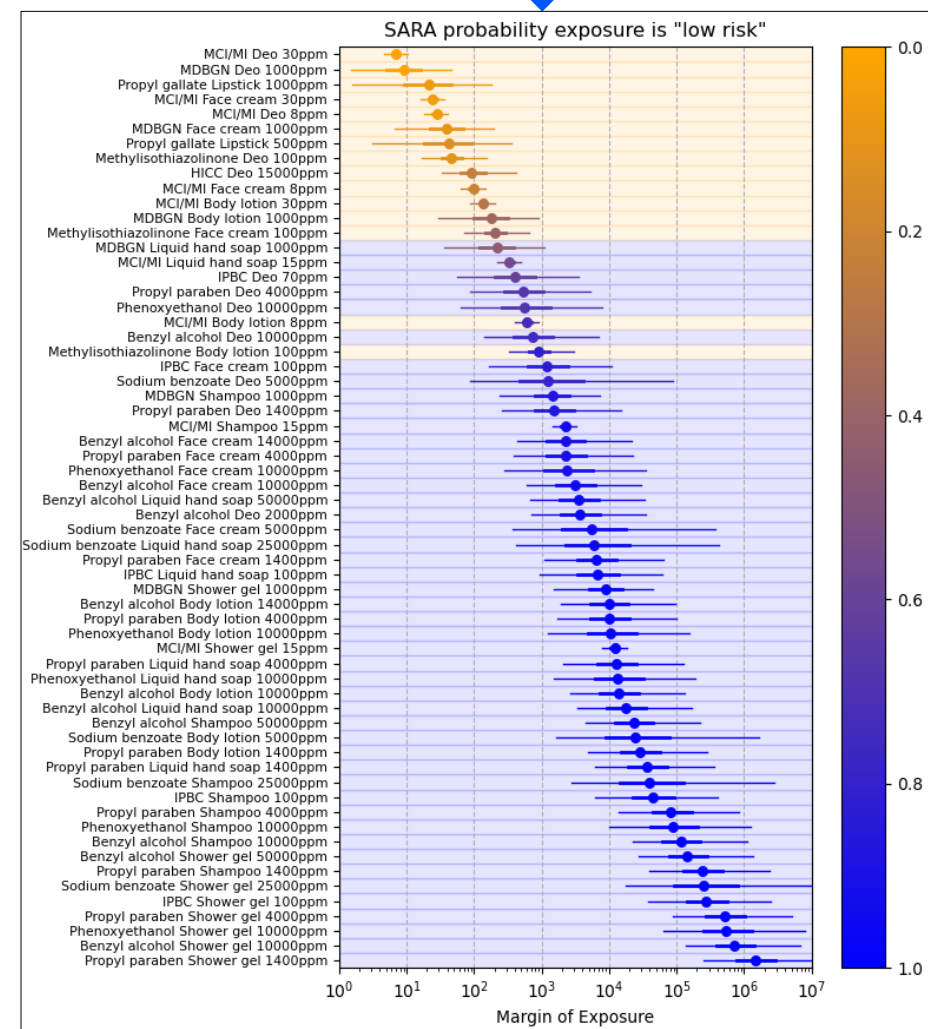
## Example

Material	Product type	Use level (ppm)	Consumer exposure to benchmark product (ng cm <sup>-2</sup> )	Induction risk
MCI/MI*	Deo	30	350	HIGH
		7.5	87.8	HIGH
	Face cream	30	100	HIGH
		7.5	25	HIGH
	Body lotion	30	18	HIGH
		7.5	4	HIGH
	Liquid hand soap	15	7.3	LOW
	Shampoo	15	1.1	LOW
Shower gel	15	0.2	LOW	

\*MCI/MI = Methylisothiazolinone/methylchloroisothiazolinone

- Probabilistic estimates of the MoE corresponding to each benchmark exposure at specific exposure level.
- Background colours indicate assigned risk category:
  - blue: low risk,
  - orange: high risk
- Shaded colours indicate the model-inferred risk. Ranking based on the median margin of exposure.

## Margin of exposure (MoE) calculation (PoD/Exposure)





# Skin Allergy Risk Assessment (SARA) Model Case Study

- **0.02% (200ppm) geraniol in a face cream**

Regulatory Toxicology and Pharmacology 131 (2022) 105159

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## Next generation risk assessment for skin allergy: Decision making using new approach methodologies

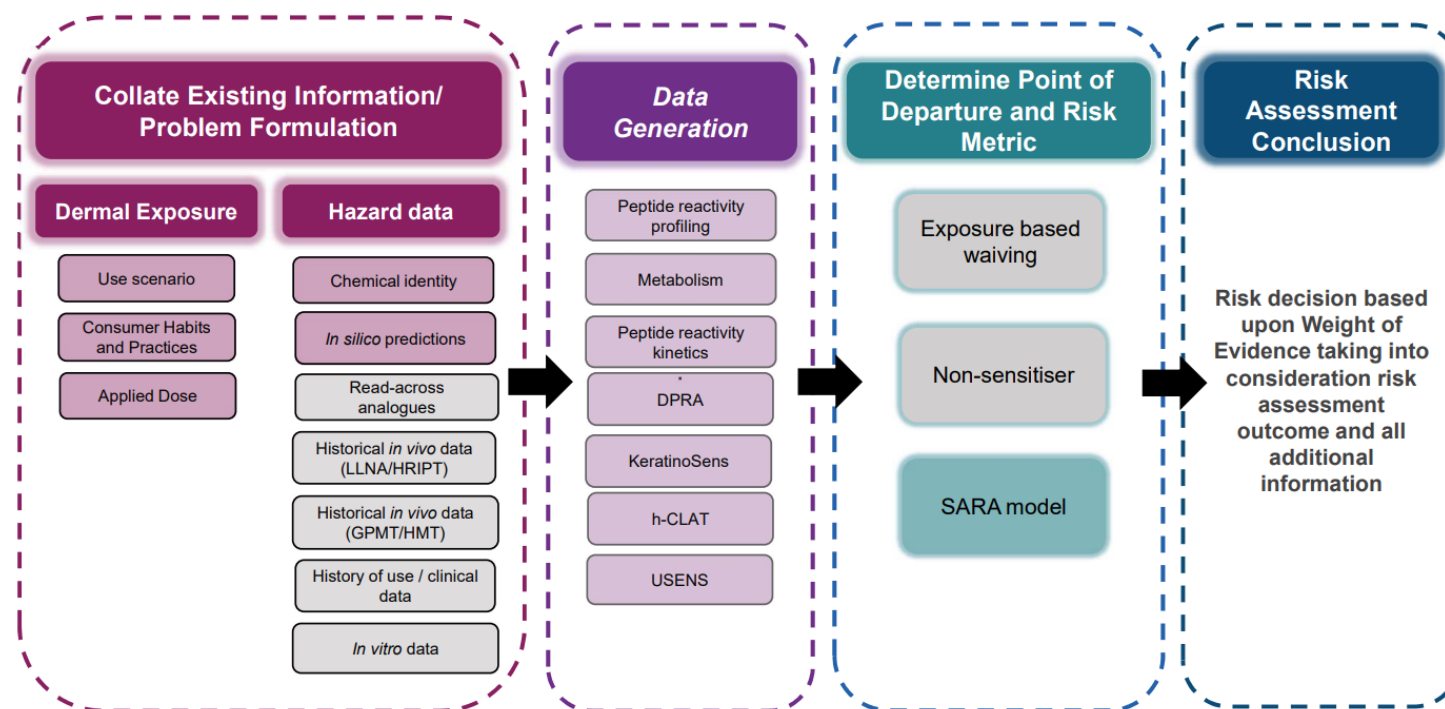
N. Gilmour<sup>\*</sup>, J. Reynolds, K. Przybylak, M. Aleksic, N. Aptula, M.T. Baltazar, R. Cubberley, R. Rajagopal, G. Reynolds, S. Spriggs, C. Thorpe, S. Windebank, G. Maxwell

*Unilever Safety and Environmental Assurance Centre, Colworth Science Park, Sharnbrook, Bedfordshire, MK44 1LQ, UK*

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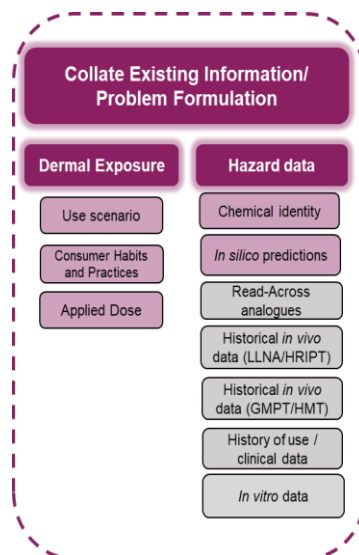
<b>ARTICLE INFO</b>	<b>ABSTRACT</b>
<p>Handling Editor: Dr. Martin Van den berg</p> <p><b>Keywords:</b> Skin allergy risk assessment Case study Next generation risk assessment Non-animal test methods NAM Uncertainty Decision making</p>	<p>Our aim is to develop and apply next generation approaches to skin allergy risk assessment (SARA) that do not require new animal test data and better quantify uncertainties. Significant progress has been made in the development of New Approach Methodologies (NAMs), non-animal test methods, for assessment of skin sensitisation and there is now focus on their application to derive potency information for use in Next Generation Risk Assessment (NGRA). The SARA model utilises a Bayesian statistical approach to infer a human-relevant metric of sensitiser potency and a measure of risk associated with a given consumer exposure based upon any combination of human repeat insult patch test, local lymph node, direct peptide reactivity assay, KeratinoSens™, h-CLAT or U-SENS™ data. Here we have applied the SARA model within our weight of evidence NGRA framework for skin allergy to three case study materials in four consumer products. Highlighting how to structure the risk assessment, apply NAMs to derive a point of departure and conclude on consumer safety risk. NGRA based upon NAMs were, for these exposures, at least as protective as the historical risk assessment approaches. Through such case studies we are building our confidence in using NAMs for skin allergy risk assessment.</p>

# Application of the NGRA framework for Skin Allergy

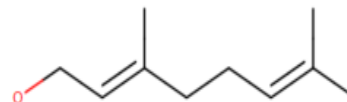


- Our NGRA framework is applied to a hypothetical skin allergy assessment of a consumer product:  
→ **0.02% (200ppm) geraniol in a face cream.**
- For the purposes of the case study, **historical *in vivo* data** and **read-across** were not used, and the use of **dermal sensitisation threshold** was not appropriate.

# Local exposure + Collate Existing Information/ Problem Formulation



## Geraniol CAS 106-24-1



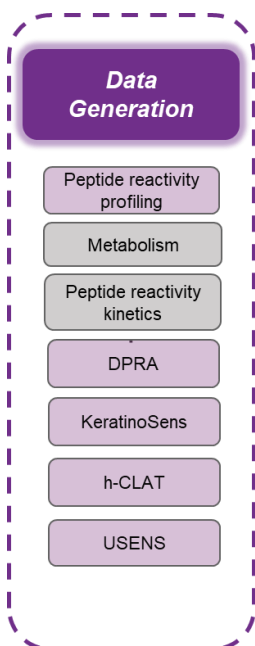
<b>Product type</b>	<b>Face cream</b>
<b>Product used per day (90<sup>th</sup> percentile) (g/day)</b>	<b>1.54</b>
<b>Ingredient inclusion level (%)</b>	<b>0.02</b>
<b>Skin surface area face (cm<sup>2</sup>)</b>	<b>565</b>
<b>Leave-on or Rinse-off</b>	<b>Leave-on</b>
<b>Local dermal exposure (µg/cm<sup>2</sup>)</b>	<b>0.544</b>

\*Scientific Committee On Consumer Safety (SCCS), 2021. The SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and Their Safety Evaluation. 11th Revision.

<b>DEREK NEXUS</b>	<b>Alert - terpenoid EC3 model - 20% (weak)</b>
<b>TIMES-SS v.2.30.1.11 Skin Sensitisation model with autoxidation</b>	<b>Parent - Non sensitiser (in domain) Metabolites - Strong sensitiser- after autoxidation to disubstituted α,b-unsaturated aldehydes, Weak sensitiser after autoxidation to hydroperoxides</b>
<b>ToxTree v.3.1.0</b>	<b>Alert for Schiff base formation</b>
<b>OECD QSAR Toolbox v.4.4</b>	<b>Protein binding by OECD Parent - No alert found Skin Metabolites (2) - Direct Acting Schiff Base Formers &gt;&gt; Di-substituted alpha, beta-unsaturated aldehydes</b>

- Geraniol is a reactive chemical and likely to be a skin sensitiser due to activation to a chemical capable of forming a Schiff base.
- Confidence in this prediction is high based upon chemical prediction consensus from all applied *in silico* tools.
- Data generation needs:
  - Assuming an abiotic activation mechanism (autoxidation), peptide reactivity profiling data should be generated to test this hypothesis. An estimation of potency is required to enable risk assessment for this exposure.
  - To enable a potency prediction using the SARA model DPRA, KeratinoSens™, h-CLAT and U-SENS™ data should also be generated.

# Data Generation



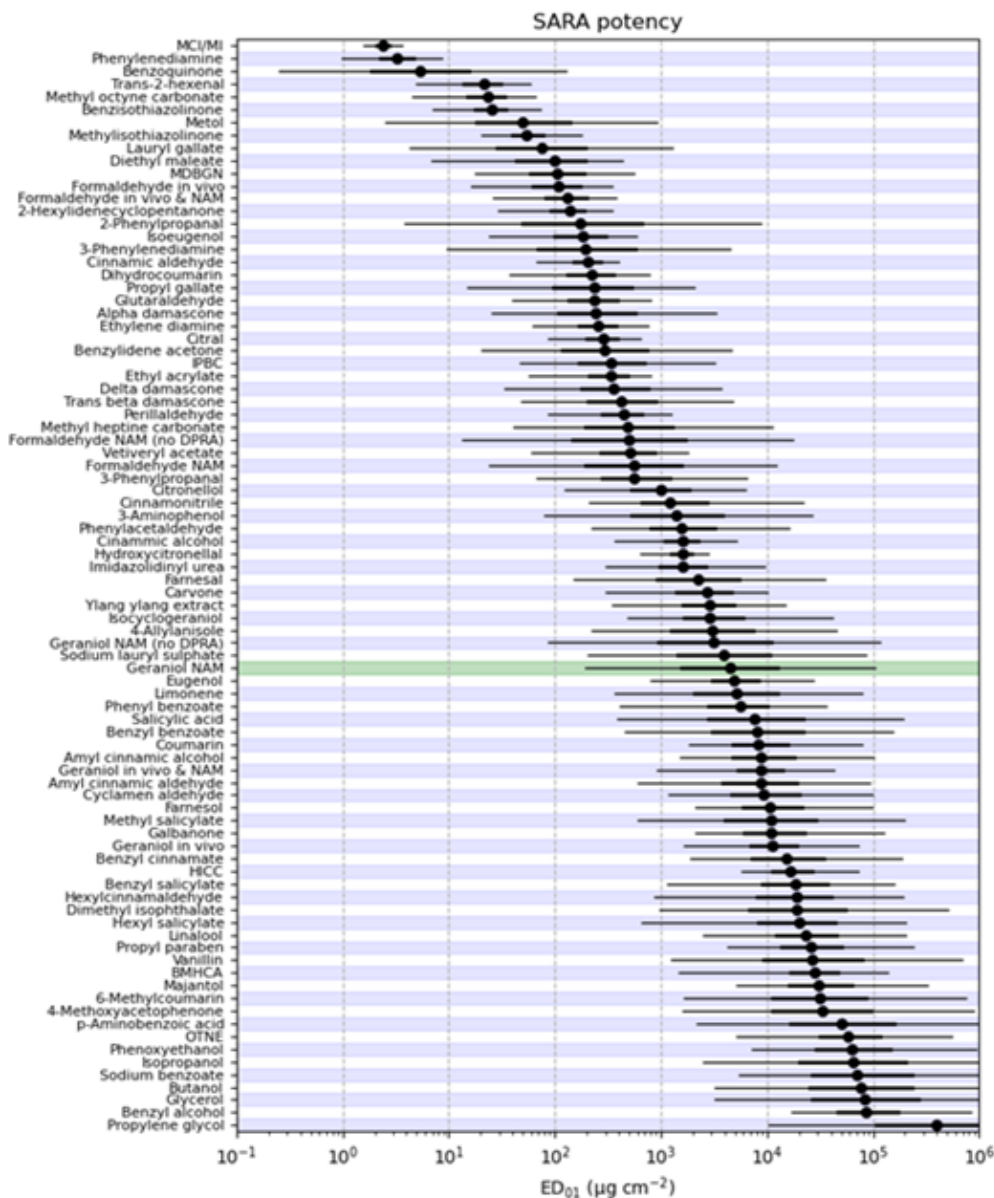
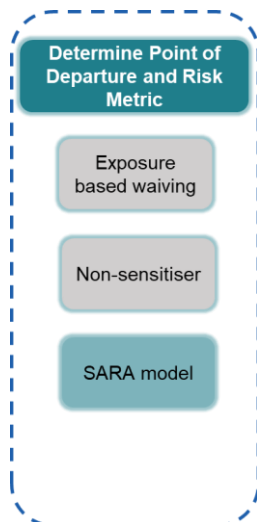
Reactivity Profiling (Aleksic et al., 2009*)	DPRA (OECD TG442C**)	KeratinoSens™ (OECD TG 442D**)	h-CLAT (OECD TG 442E**)	U-SENS™ (OECD TG 442E**)
Cys (no adducts, 73.7%) Lys (no adducts, 3.5%) His (no adducts, -11.1%) <b>Arg (double Schiff base, 15.2%)</b> Tyr (no adducts, 8.2%) <b>N-term (acylation, Schiff base, 40.2%)</b> Ala (no adducts, -2.1%)	<b>Negative</b> Cys depletion 0% Lys depletion 10%	<b>Positive</b> EC <sub>1.5</sub> 110 µM EC <sub>3</sub> >2000 µM IC <sub>50</sub> 875 µM	<b>Positive</b> CD86 EC <sub>150</sub> 123 µg ml <sup>-1</sup> CD54 EC <sub>200</sub> - µg ml <sup>-1</sup> CV <sub>75</sub> 140 µg ml <sup>-1</sup>	<b>Positive</b> CD86 EC <sub>150</sub> 53.6 µg ml <sup>-1</sup> CV <sub>70</sub> 113.9 µg ml <sup>-1</sup>

- Geraniol was confirmed to be a **reactive chemical (Schiff base following autoxidation)** by peptide profiling where adducts consistent with formation of Schiff bases following oxidative activation were observed with the Arginine and N-terminus peptide.
- Geraniol demonstrated minimal depletion of Cys and Lys in the DPRA, which is consistent with the reactivity profiling data. Positive responses were evident in the KeratinoSens™, h-CLAT and U-SENS™.
- Thus, geraniol is a **skin sensitiser via Schiff base formation**.
- **Next step:** determination of the PoD, i.e. the human potency (ED<sub>01</sub>) → SARA model

\*Aleksic et al.. Reactivity profiling: covalent modification of single nucleophile peptides for skin sensitization risk assessment. *Toxicol. Sci.* 108, 401–411, 2009.

\*\*DPRA, KeratinoSens™, h-CLAT and USENS™ data were sourced from the Cosmetics Europe database (Hoffmann et al. Non-animal methods to predict skin sensitization (I): the Cosmetics Europe database, *Crit. Rev. Toxicol.* 48, 344–358, 2018).

# Determine Point of departure using SARA DA



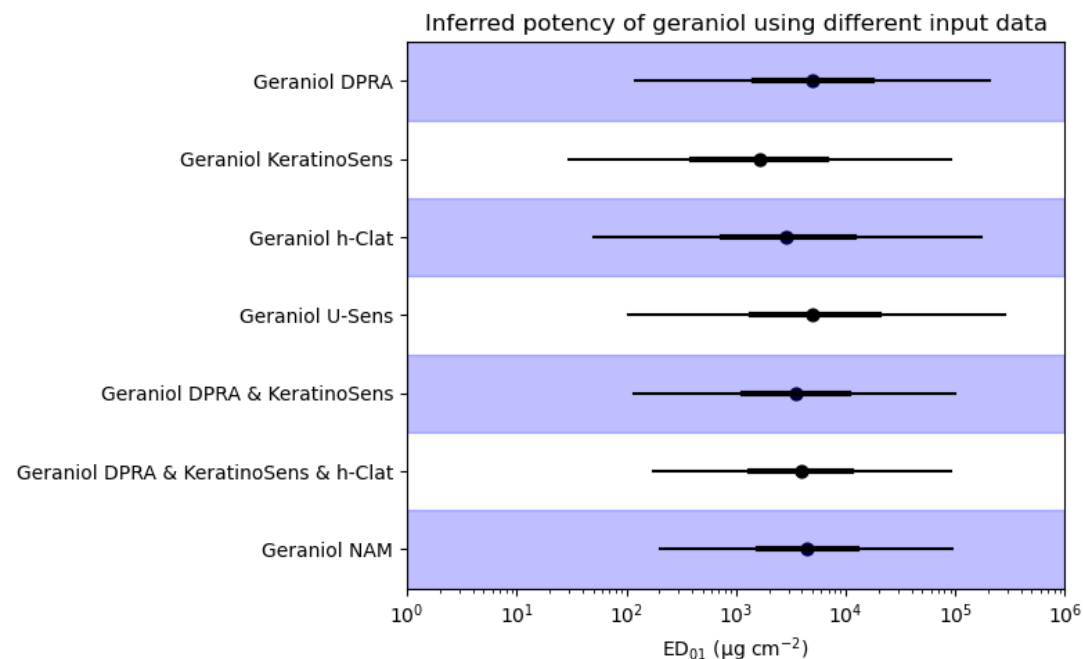
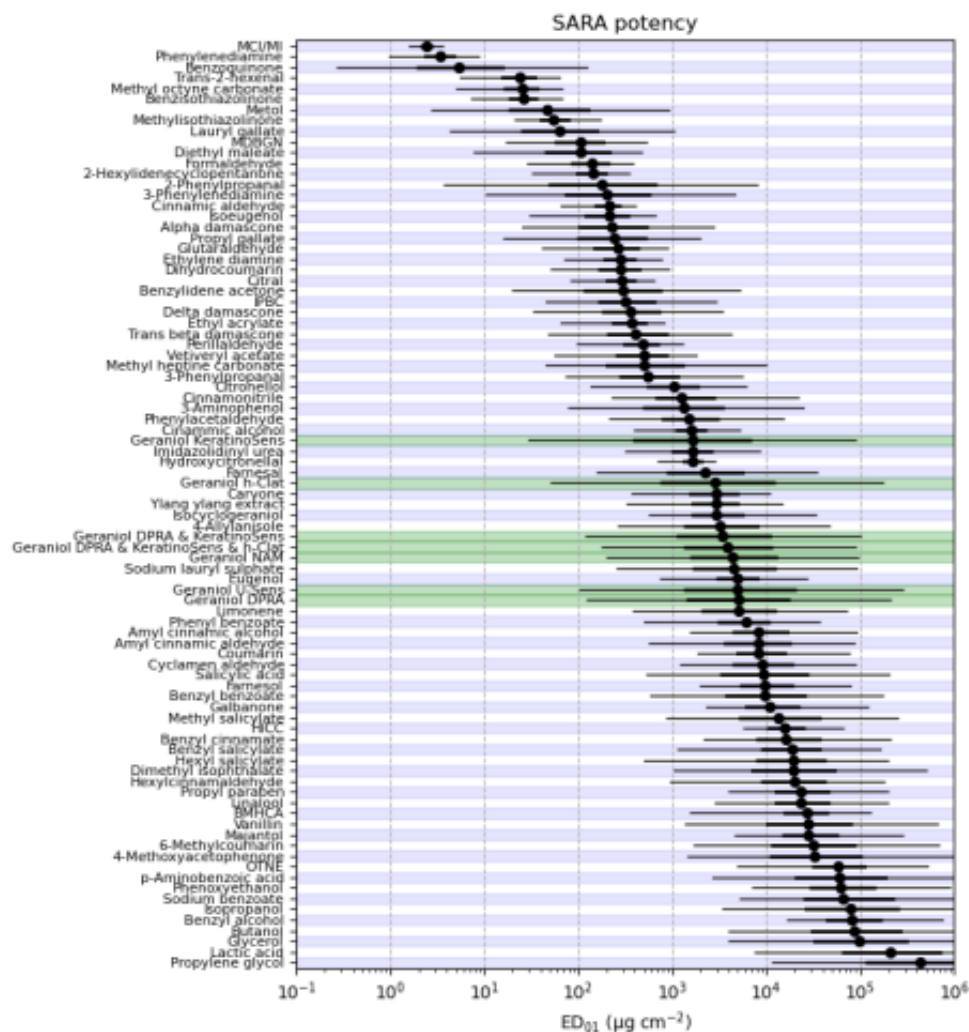
- The generated DPR, KeratinoSens™, h-CLAT and U-SENS™ data were used as inputs into the SARA model to define a **human relevant PoD (ED<sub>01</sub> i.e the 1% sensitising dose for a HRIPT population)**.

- For geraniol (NAM data only), the expected **ED<sub>01</sub> is 4,500 µg cm<sup>-2</sup>** (2.5<sup>th</sup> percentile: 180 µg cm<sup>-2</sup>, 97.5<sup>th</sup> percentile: 96,000 µg cm<sup>-2</sup>).
- Geraniol ranks with eugenol, which at least based upon LLNA data is reported to be of moderate potency

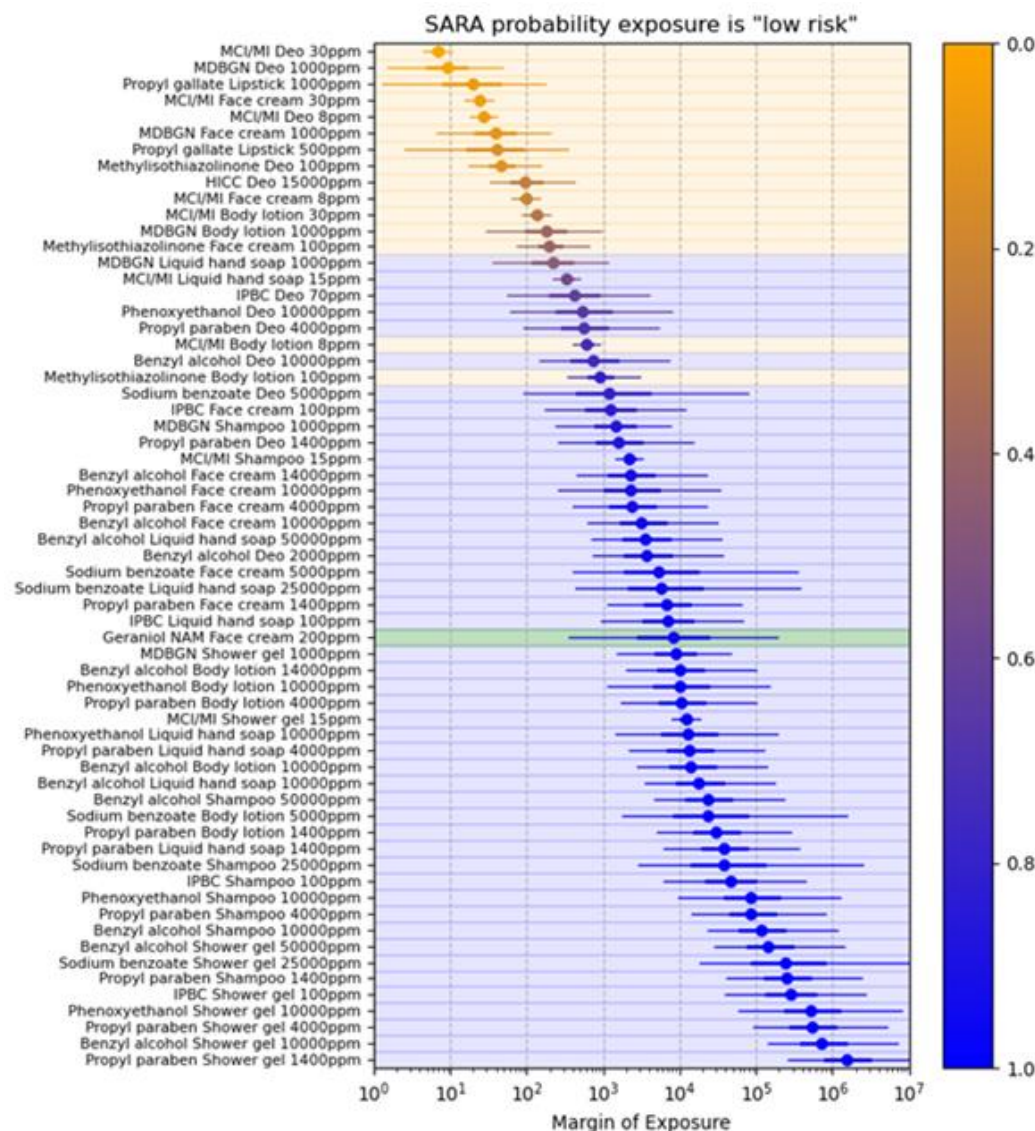
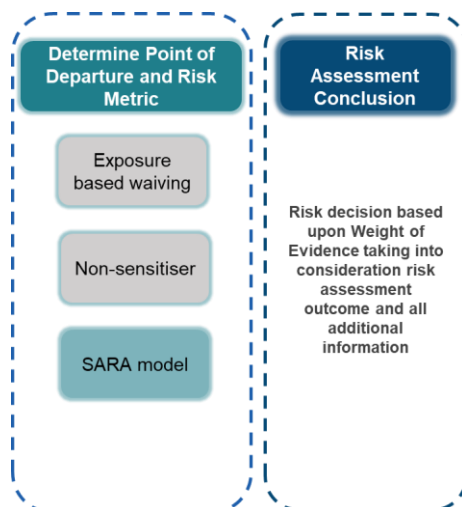


# SARA model: partial datasets

- The SARA model can make predictions based upon **any combination** of the DPRA, KeratinoSens™, h-CLAT and U-SENS™ data.
- Predictions made using just KeratinoSens™ or h-CLAT data yielded a marginally higher expected potency (lower  $ED_{01}$ ) compared with the predictions made using just DPRA or U-SENS™ data.
- Combining data increases the precision in the estimate of potency (reduced uncertainty).



# Determine MoE/Acceptable Exposure Level + NGRA conclusion



- The MoE was calculated from the  $ED_{01}$  for geraniol and the dermal exposure for 0.02% geraniol in a face cream using SARA DA
- The MoE for 0.02% geraniol face cream exposure ranks with the low-risk benchmarks.
- The SARA DA probability that this exposure is low risk is calculated to be 0.95. Thus, there is a 95% probability that this exposure is low risk.
- Geraniol used at 0.02% (200 ppm) in a face cream is low risk for induction of skin sensitisation

## Conclusions & Next Steps

- Significant progress has been made in the last decade to apply non-animal experimental data using Defined Approaches (DAs) & tiered frameworks.
- Bayesian DAs enable experimental data variability to be modelled and uncertainty in PoDs & risk metrics to be factored into decision-making.
- Ongoing model development to expand the database, further incorporate mechanistic reactivity knowledge and explore new SARA inputs
- Recently published NGRA framework and case studies:
  - ✓ Cosmetic Europe NGRA framework (Gilmour et al., 2020)
  - ✓ Coumarin case study (Reynolds et al., 2021)
  - ✓ Unilever NGRA framework and other case studies (Gilmour et al., 2022; Gilmour et al., 2023)

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Development of a next generation risk assessment framework for the evaluation of skin sensitisation of cosmetic ingredients

Nicola Gilmour<sup>a,1</sup>, Petra S. Kern<sup>b,1</sup>, Nathalie Alépée<sup>c</sup>, Fanny Boisléve<sup>d</sup>, Dagmar Bury<sup>e</sup>, Elodie Clouet<sup>f</sup>, Morihiko Hirota<sup>g</sup>, Sebastian Hoffmann<sup>h</sup>, Jochen Kühn<sup>i</sup>, Jon F. Lalko<sup>j</sup>, Karsten Mewes<sup>k</sup>, Masaaki Miyazawa<sup>l</sup>, Hayato Nishida<sup>m</sup>, Anne Osmani<sup>n</sup>, Dirk Petersohn<sup>o</sup>, Shuichi Sekine<sup>p</sup>, Erwin van Vliet<sup>q</sup>, Martina Klaric<sup>r,2</sup>

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Next generation risk assessment for skin allergy: Decision making using new approach methodologies

N. Gilmour<sup>1</sup>, J. Reynolds, K. Przybylak, M. Aleksic, N. Aptula, M.T. Baltazar, R. Cubberley, R. Rajagopal, G. Reynolds, S. Spriggs, C. Thorpe, S. Windebank, G. Maxwell

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A hypothetical skin sensitisation next generation risk assessment for coumarin in cosmetic products

G. Reynolds<sup>1</sup>, J. Reynolds, N. Gilmour, R. Cubberley, S. Spriggs, A. Aptula, K. Przybylak, S. Windebank, G. Maxwell, M.T. Baltazar

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Research Article

**Applying a Next Generation Risk Assessment Framework for Skin Sensitisation to Inconsistent New Approach Methodology Information**

Nicola Gilmour<sup>1</sup>, Nathalie Alépée<sup>2</sup>, Sebastian Hoffmann<sup>3</sup>, Petra S. Kern<sup>4</sup>, Erwin van Vliet<sup>5</sup>, Dagmar Bury<sup>6</sup>, Masaaki Miyazawa<sup>7</sup>, Hayato Nishida<sup>8</sup> and Cosmetics Europe<sup>9</sup>

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# NICEATM-Unilever CRADA



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

## NICEATM News - 2021 Issue 25: May 27

**In this Newsletter:**

**[NICEATM to Collaborate with Unilever on Development of Predictive Model for Skin Sensitization](#)**

**NICEATM to Collaborate with Unilever on Development of Predictive Model for Skin Sensitization**

NICEATM has entered into an agreement with consumer products company Unilever to collaboratively test and further develop their Skin Allergy Risk Assessment (SARA) predictive model. SARA is a computational model that uses a variety of input data to estimate a probability that a chemical will cause an allergic skin reaction in humans. NICEATM will test the SARA model using a variety of chemical data sets, including chemicals of interest to U.S. and international regulatory agencies. NICEATM and Unilever will also work together to expand the SARA model to include data generated by NICEATM. The intent is to make the SARA model openly available for public use along with other NICEATM predictive models. Availability of the SARA model will help further reduce animal use for the endpoint of skin sensitization, and will improve upon existing efforts by providing points of departure for quantitative human risk assessment.

[Information about other NICEATM projects](#) to evaluate alternatives to animal use for skin sensitization is available at <https://ntp.niehs.nih.gov/go/ACDtest>.

Reference: [Reynolds et al.](#) Probabilistic prediction of human skin sensitizer potency for use in next generation risk assessment. *Comput Toxicol* 9:36-49. <https://doi.org/10.1016/j.comtox.2018.10.004>

- Unilever-NICEATM CRADA partnership is developing a publicly available version of SARA , the SARA-ICE model (coming in 2024), for hazard, GHS potency classification, and point of departure for use in risk assessment.
- The SARA-ICE Model is currently under evaluation by the OECD DASS WG for incorporation into OECD TG 497.

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8: Global regulatory landscape

5: In vitro data synthesis

6: Internal Exposure: Dosimetry

7: Risk assessment

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**Katarzyna Przybylak**

**Maria Baltazar**

**Paul Russell**

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**Matt Dent**

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- Estrutura de avaliação de risco de última geração para sensibilização dérmica usando novas abordagens metodológicas (NAMs)

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