

# Opportunities and Challenges to the use of NAMs to support Environmental Safety: an industry perspective

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(SEAC) Unilever, UK



# Who we are and what we do





# We make many of the world's favourite brands



# Innovating boldly for people and planet

Every day, 2.5 billion people around the world use our products, and every one of these products is developed using world-class science and technology.



We invested €800m into R&D in 2020 and we have over 20,000 patents protecting the ideas, discoveries and breakthroughs that our global team of 5,000 world-leading experts produce.

“Innovating boldly for people and planet means challenging our thinking and applying real science and technology to tackle big challenges that matter”

Richard Slater, Chief R&D Officer



# Unilever – Safety & Environmental Assurance Centre (SEAC)

## Ensuring Unilever’s Innovations & Products are Safe & Sustainable by Design

### 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.



#### Leading safety and environmental sustainability sciences

The scientists behind our safe and sustainable products



#### Safe and sustainable by design

How we build safety and sustainability into every product innovation.



#### Keeping people and the environment safe

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



#### Reducing our environmental impact

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

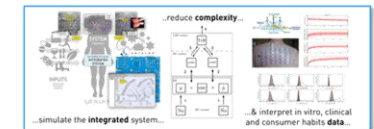
### Unilever Product / Ingredient Safety Governance

- Provide scientific evidence to manage safety risks & environmental impacts

### Industry-leading Safety & Environmental Sustainability Science Capability

- Deploy expertise on higher risk business projects
- Collaborate with leading external research teams to develop & apply new capability
- Leverage our science & global networks for consumer trust & freedom to operate

Computational science is transforming our ability to do non-animal risk assessments



Informatics tools for faster data integration & decision-making



Predictive modelling for less testing & lower cost



### Responsible Innovation



Unilever conducts responsible sustainable research and innovation which fully respects the concerns of our consumers and society. In addition, our consumer needs, Unilever’s innovations are based on sound science and technology, and reflect high standards and ethical principles.

Unilever has global standards for responsible innovation.

UNILEVER INTERNAL

Responsible Innovation Code Policy - Unilever Standard



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# All underpinned by SEAC science, its scientists and our scientific partners



United States Environmental Protection Agency

Environmental Topics ▾ Laws & Regulations ▾ Report a Violation ▾ About EPA ▾

News Releases from Headquarters > Research and Development (ORD) CONTACT US

## EPA and Unilever Announce Major Research Collaboration to Advance Non-animal Approaches for Chemical Risk Assessment

August 19, 2021

**Contact Information**  
EPA Press Office ([press@epa.gov](mailto:press@epa.gov))

**WASHINGTON** - Today, the U.S. Environmental Protection Agency (EPA) and Unilever announced a collaborative agreement to explore better ways to assess chemical risks associated with consumer products. This agreement builds on prior cooperation between EPA and Unilever regarding New Approach Methods (NAMs), which are a promising alternative to conventional toxicity testing that are intended to reduce reliance on the use of animals.

EPA and Unilever have been jointly evaluating and using NAMs since 2015. This collaboration is helping EPA implement its New Approach Methods Work Plan and is the foundation for new efforts to demonstrate that these novel approaches can help decision makers better protect consumers, workers and the environment.

"EPA is a pioneer in developing and applying NAMs to identify and quantify risks to human health, while reducing the use of animals in chemical toxicity testing," said **H. Christopher Frey, Deputy Assistant Administrator for Science Policy in EPA's Office of Research and Development**. "We are excited to continue the collaboration with Unilever, which enhances the robustness of our mutual research to demonstrate the use of NAMs."

19 Aug 2021

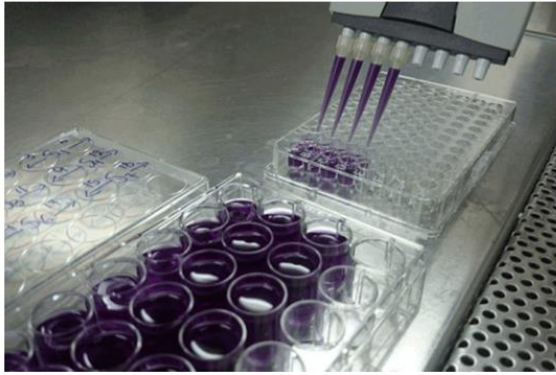


Details of SEAC's presentations and publications on [www.tt21c.org](http://www.tt21c.org)



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# Sharing our science



## Webinar: Use of NAMs for Cosmetic Safety Assessment

Online 30th April 2020

## Webinars



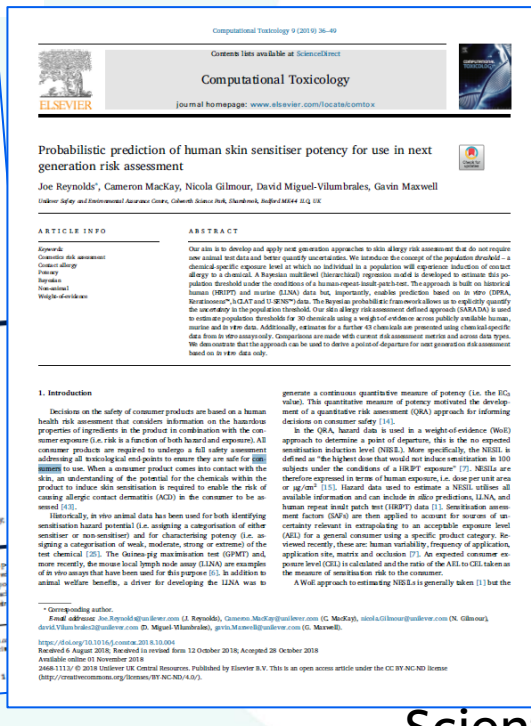
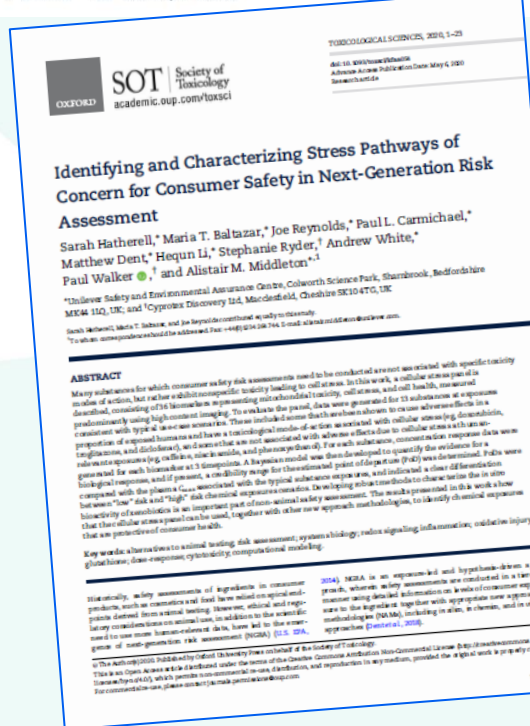
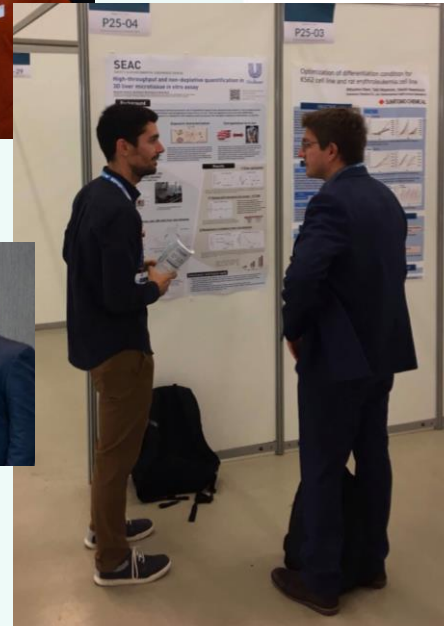
## Videos

tt21c.org

# Conferences and workshops



CARL WESTMORELAND  
SAFETY & ENVIRONMENTAL ASSURANCE CENTRE,  
UNILEVER, UK  
联合利华安全与环境保障中心



# Scientific publications



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# Driving Innovation of Environmental safety:

## Advancing the science



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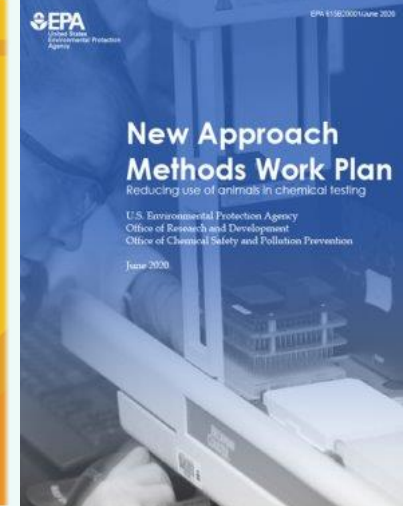
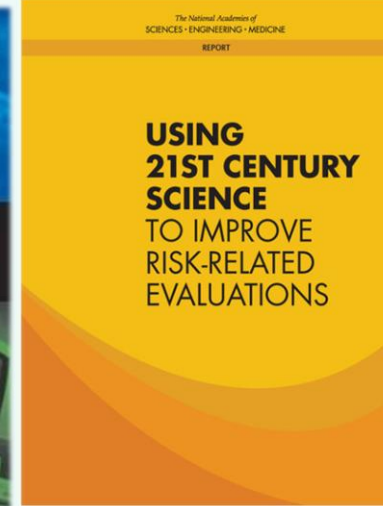
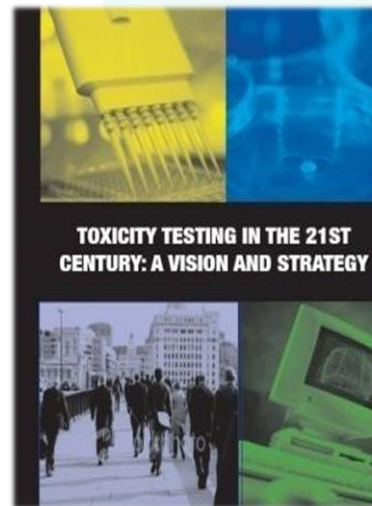
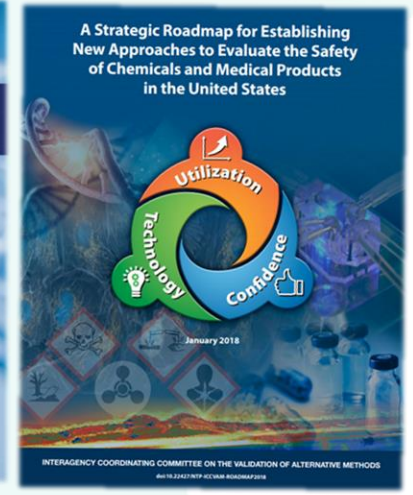
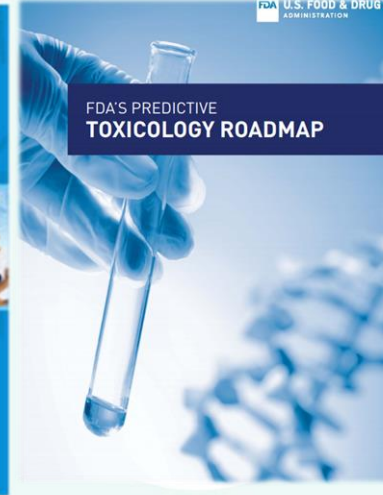


# Next Generation Risk Assessment (NGRA)

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***



Safety without animal testing



Contents lists available at ScienceDirect

**ELSEVIER** Computational Toxicology

journal homepage: [www.elsevier.com/locate/comtox](http://www.elsevier.com/locate/comtox)

Principles underpinning the use of new methodologies in the risk assessment of cosmetic ingredients



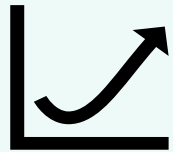
Matthew Dent<sup>a,\*</sup>, Renata Teixeira Amaral<sup>b</sup>, Pedro Amores Da Silva<sup>b</sup>, Jay Ansell<sup>c</sup>, Fanny Boisjelle<sup>d</sup>

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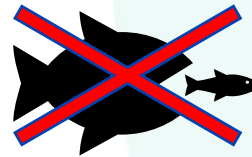


# Safety science: what can we do better?

Ensuring that the use of ingredients in our products is **safe** for the receiving environment



Better, more sustainable chemicals



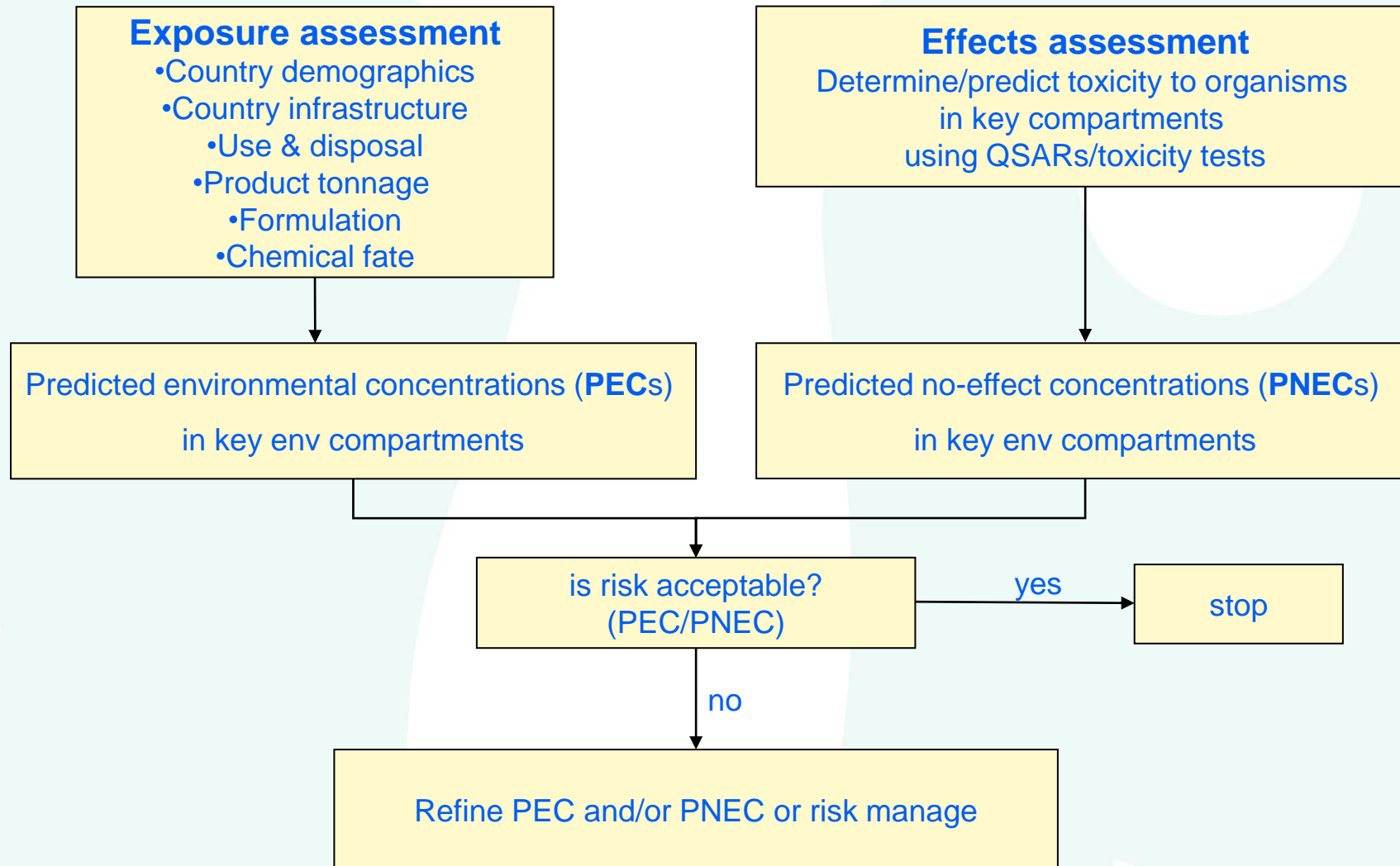
Moving away from animal tests

**...THUS** NAMs provide the opportunity for more mechanistic, higher throughput and animal-free ERA

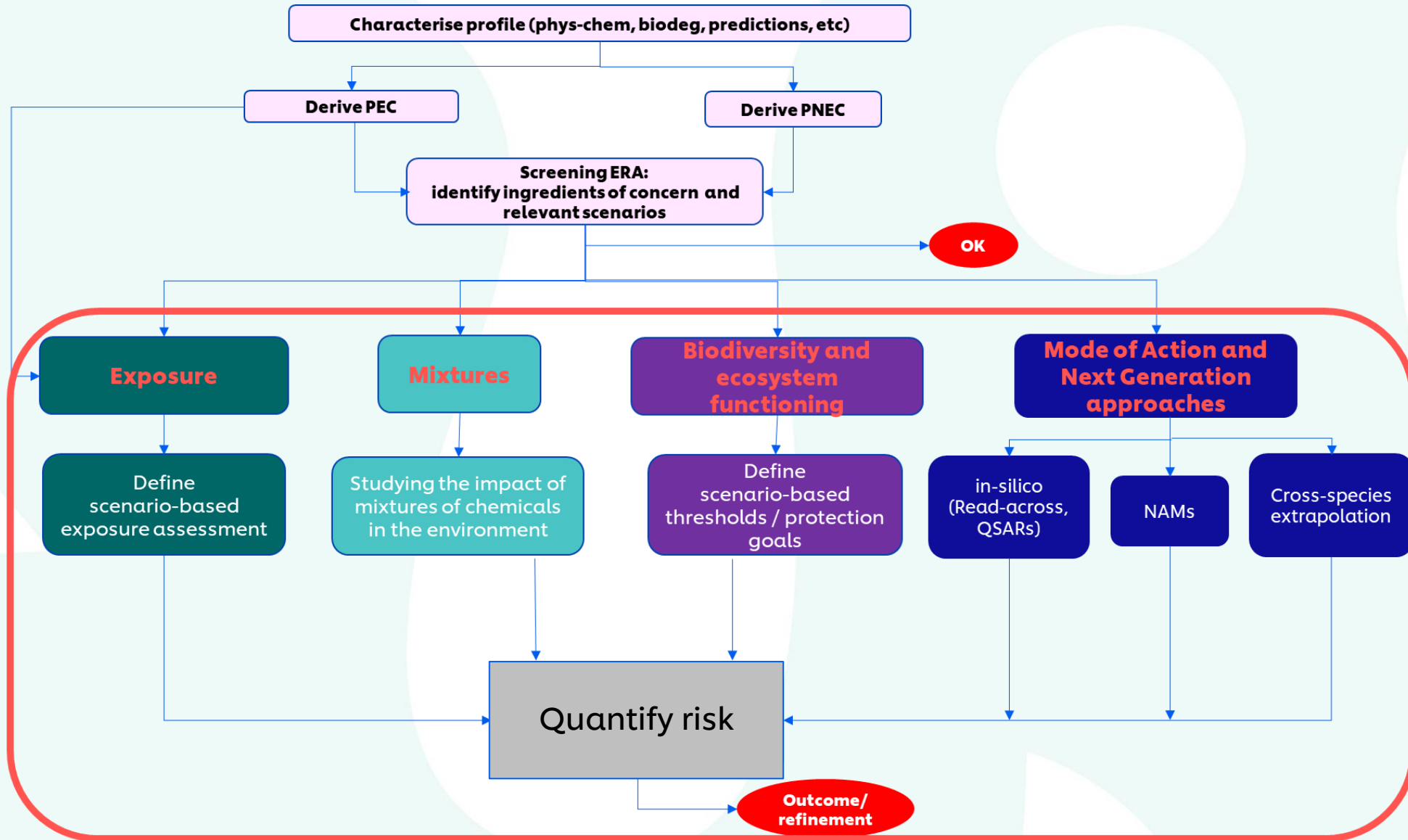


# Environmental Risk Assessment (ERA) Framework

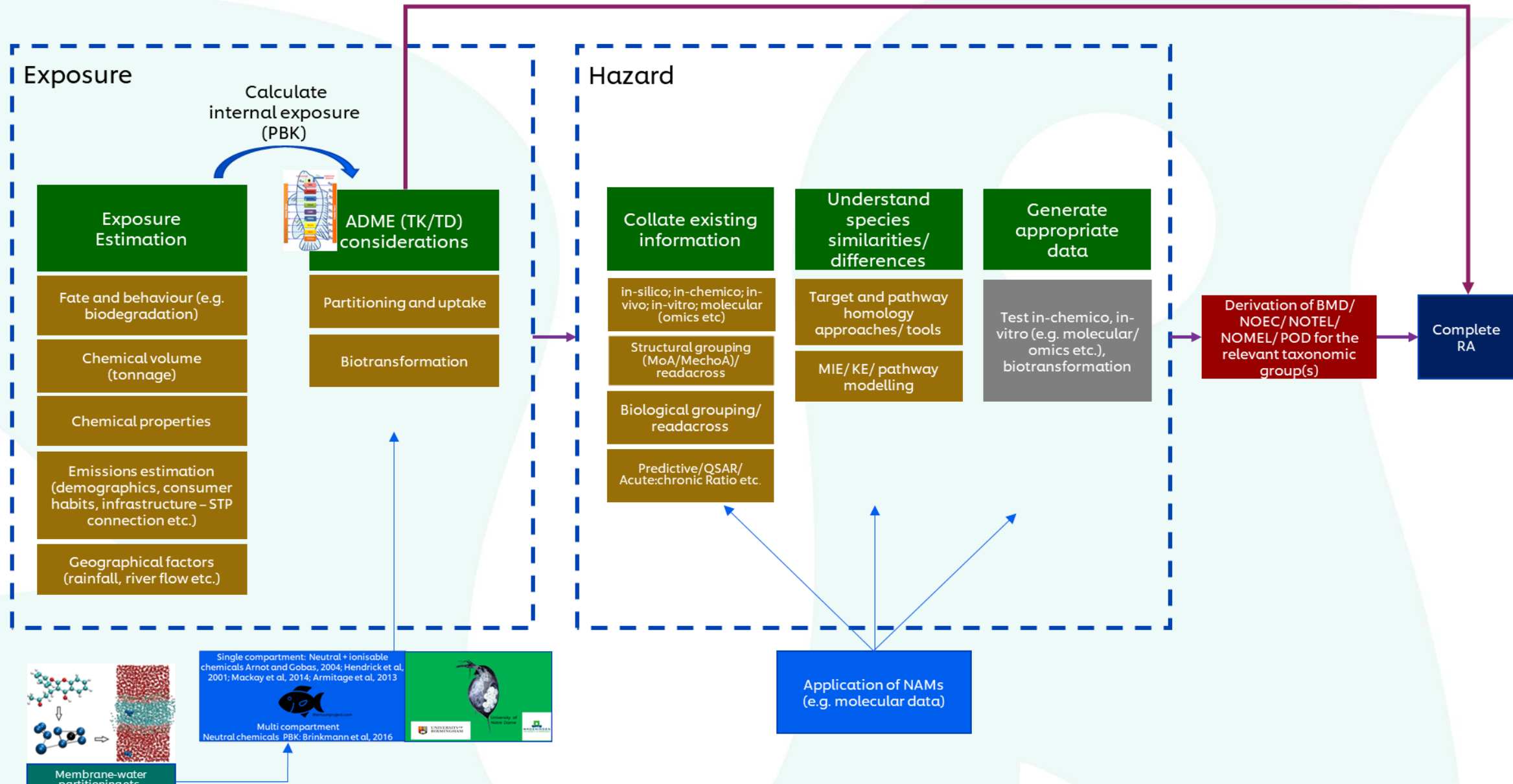
## ERA is driven by the exposure



# Safety science: what can we do better?



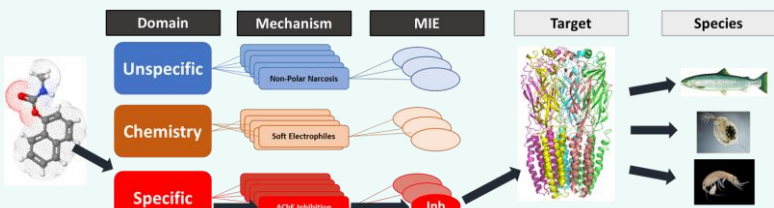
# NAMs in environmental safety assessments (examples)



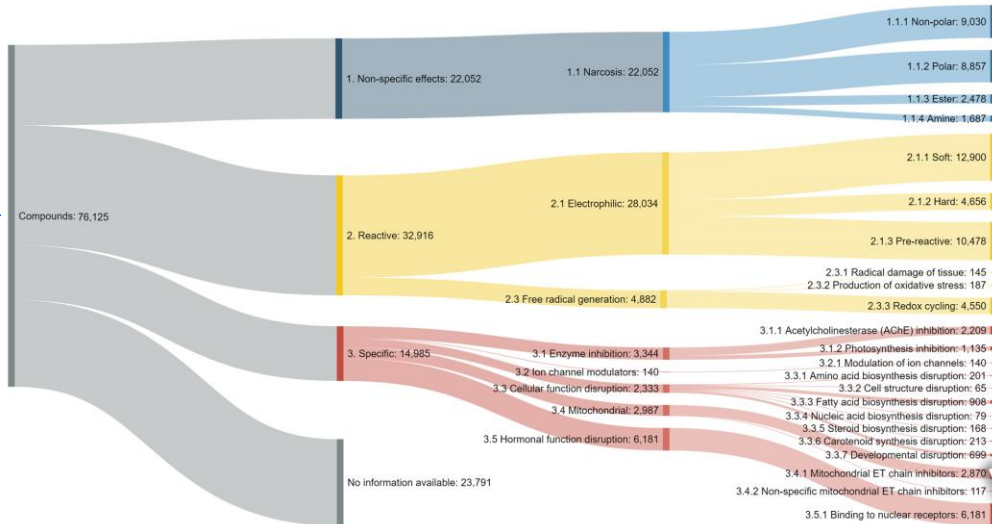
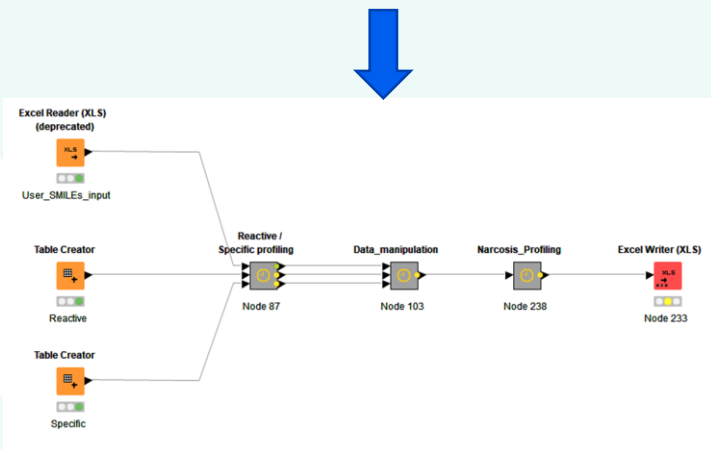
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# MIE/ MechoA profiling

To reduce the proportion of compounds that receive an “unclassified” by current schemes enabling more robust grouping/ read-across/ prioritisation



Domain	Mechanistic Group	
1. Unspecific	1.0 Narcosis	1.0.1 Non-polar, 1.0.2 Polar, 1.0.3 Ester, 1.0.4 Amine
	1.1 Uncoupling	1.1.1 Other
2. Reactive / Chemistry based	2.1 Electrophilic	2.1.1 Soft, 2.1.2 Hard, 2.1.3 Pre-reactive
	2.2 Free radical generation	2.2.1 Radical damage of tissues, 2.2.2 Production of oxidative stress, 2.2.3 Redox cycling
3. Specific	3.1 Enzyme inhibition	3.1.1 AChE inhibition, 3.1.2 Photosynthesis inhibition
	3.2 Ion channel modulators	3.2.1 Modulation of ion channels
	3.3 Cellular function disruption	3.3.1 Amino acid biosynthesis disruption, 3.3.2 Cell structure disruption, 3.3.3 Fatty acid biosynthesis disruption, 3.3.4 Nucleic acid biosynthesis disruption, 3.3.5 Steroid biosynthesis disruption, 3.3.6 Carotenoid synthesis disruption, 3.3.7 Developmental disruption
	3.4 Mitochondrial	3.4.1 Mitochondrial ET chain inhibitors, 3.4.2 Non-specific mitochondrial ET chain inhibitors
	3.5 Hormonal function disruption	3.5.1 Nuclear receptors - ER, AR, TR etc.



Dataset	Origin	Number of compounds
REACH	REACH pre-registered substances (ECHA, 2008)	66832
DrugBank	Drugbank v. 5.1.8	10392
COSMOS Pharma	Open Data (DrugBank, 2021)	4303
Pesticides	Firman et al., 2021	1,571
Botanicals	EU Pesticides Database (European Commission, 2021)	941
Literature dataset	EFSA Compendium of Botanicals (EFSA, 2017)	899
Mintel dataset	Various publications	3458
Monitoring dataset	Mintel Global New Products Database	228
	Supplied by Unilever	2703
		76125

- ↑ Classified compounds
- ↑ Species coverage
- ↑ Chemical coverage
- ↑ Unique information particularly for the reactive and specific domains

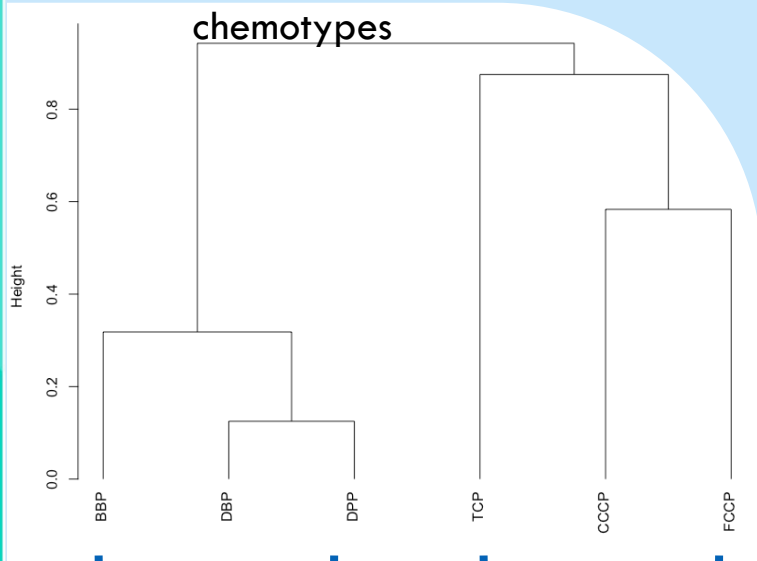


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# Omics based grouping for read-across

Conventional structure-based grouping hypothesis

Hierarchical clustering of ToxPrint



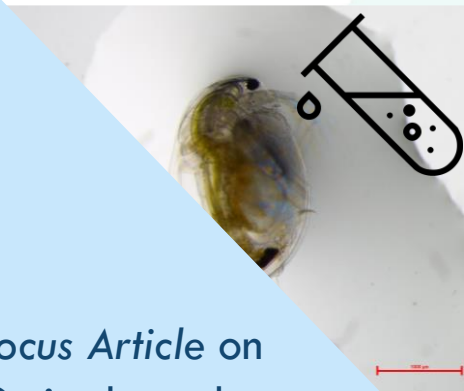
## Butyl phthalates

benzyl butyl phthalate (BBP)  
dibutyl phthalate (DBP)  
diisobutyl phthalate (DiBP)

## Uncouplers of oxidative phosphorylation

2,3,4,5-tetrachlorophenol (TCP)  
carbonyl cyanide 3- chlorophenylhydrazone (CCCP)  
carbonyl cyanide 4-(trifluoromethoxy)phenylhydrazone (FCCP)

Omics-based chemical grouping



Focus Article on Omics-based grouping

Acute (48 h) exposure of juvenile (5 d) *D. magna* to 6 test compounds

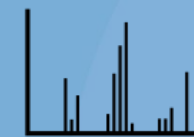
Transcriptomics

Custom BioSpyder TempO seq platform covering 1991 *D. magna* genes



Metabolomics

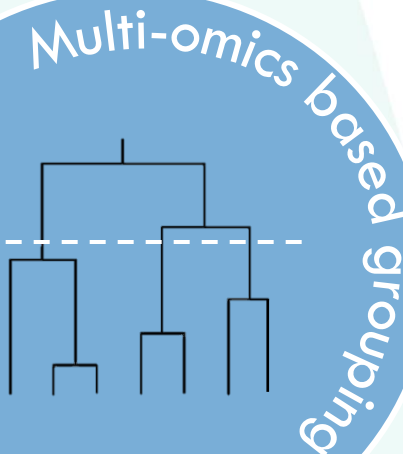
Hybrid LC-MS(/MS) assays by Phenome Centre Birmingham

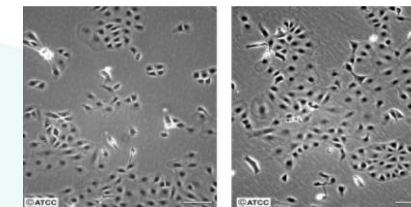


Processing and statistical analysis of each omics data stream



Fuse data streams and perform hierarchical cluster analysis





## Application of fish cell lines to inform hazard

RTgill-W1 Cell  
Line Assay for  
**Predicting Fish  
Acute Toxicity**  
in surfactants  
OECD 249

<https://www.oecd.org/chemicalsafety/test-no-249-fish-cell-line-acute-toxicity-the-rtgill-w1-cell-line-assay-c66d5190-en.htm>

**CRACK-IT**  
Challenge:  
Develop bioassays  
to report  
impairment of  
critical fish-  
specific pathways

Benchmark  
response of  
Human and Fish  
cell lines in  
response to  
impairment of  
**Cellular Stress**

Benchmark PODs  
derived to a  
common set of  
chemicals covering  
diverse MoA in  
Human and fish  
Cell lines

Culture cell lines  
without using  
animal compounds  
(e.g. **FBS**)

Cross-species extrapolation

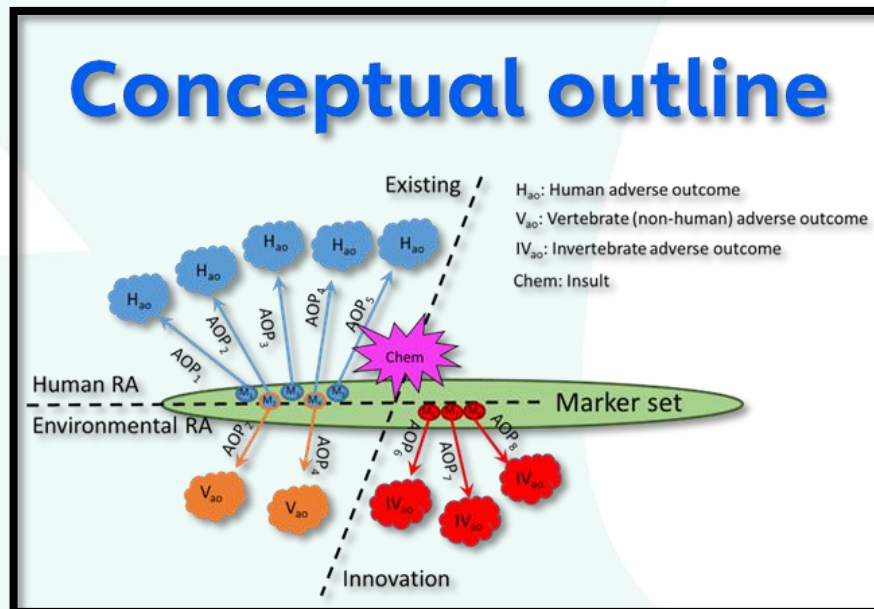
Short-term

Long-term

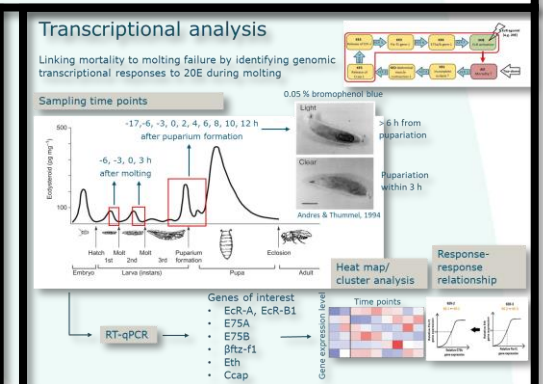
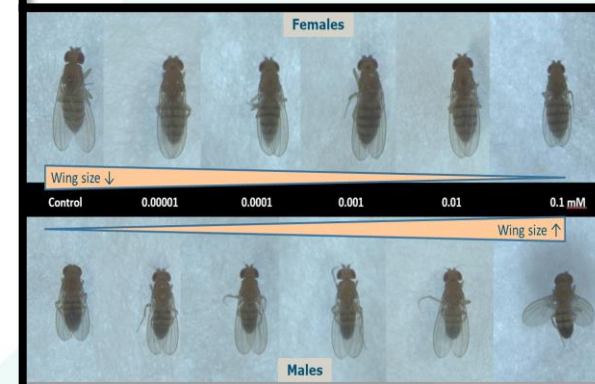
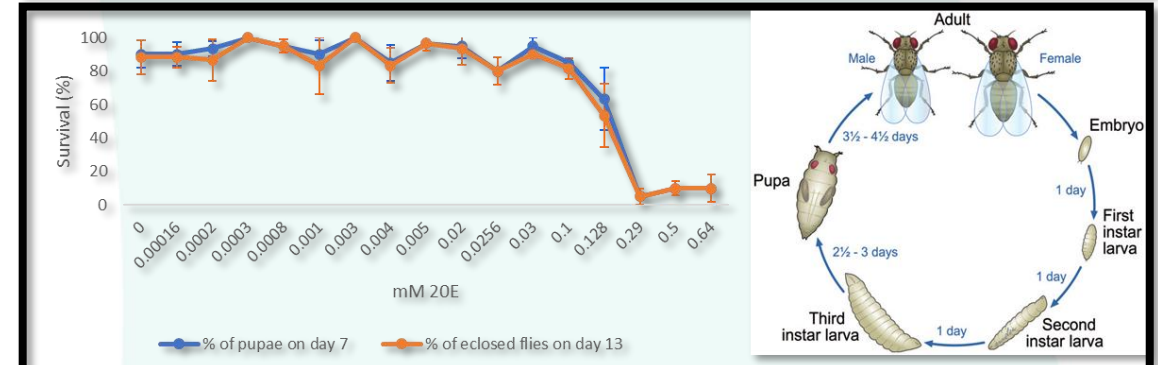
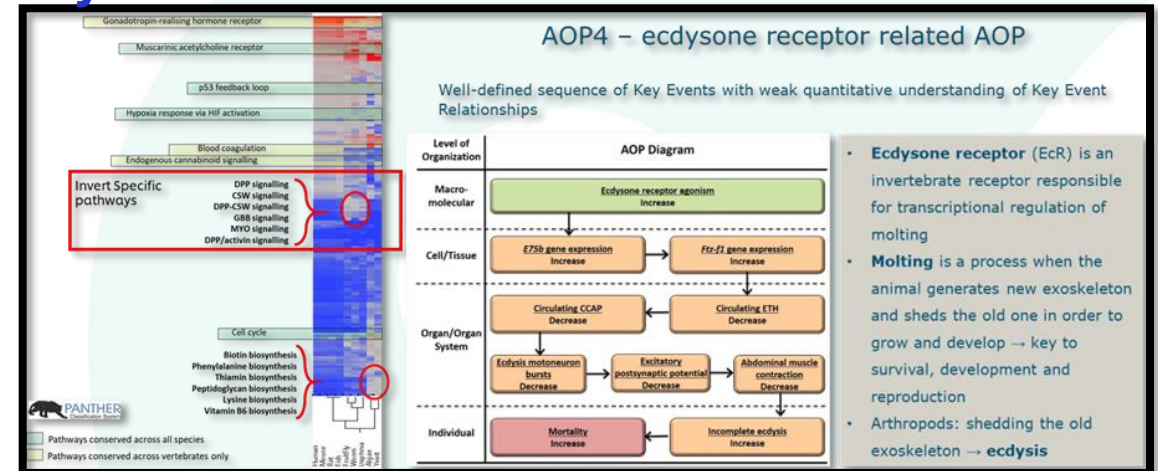


## Key research objectives

- Identification of relevant biological space and Adverse outcomes
- Quantitative understanding of key event relationships (KERs) integrating *in vitro* and *in vivo* experimental approaches
- Developing *in vitro* assays with biological pathway information specific for invertebrates
- Linking macroscopic (organism) adverse outcome to microscopic (cell) initiating event



## Key results



# Other relevant activities

## Safety & Environmental Assurance Centre



### Deriving baseline toxicity QSARs for ionisable organic chemicals by using experimental and computational membrane-water partition coefficients

Andrea Gredelj<sup>1</sup>, Elin L. Barrett<sup>1</sup>, Jayne Roberts<sup>1</sup>, Thomas D. Potter<sup>2</sup>, Alexandre Teixeira<sup>1</sup>, Nicola Bettles<sup>1</sup>, Geoff Hodges<sup>1</sup>, Mark A. Miller<sup>2</sup>  
<sup>1</sup> Safety and Environmental Assurance Centre, Unilever, Bedford, MK44 1LQ, UK <sup>2</sup> Department of Chemistry, Durham University, South Road, Durham DH1 3LE, UK

#### 1. Introduction

- Quantitative Structure Activity Relationships (QSARs) provide a viable alternative to in-vivo toxicity testing for risk assessment.
- The majority of these QSARs are hydrophobicity-based relationships correlating the octanol-water partition coefficient,  $\log K_{ow}$ , of a chemical to its toxicity.
- Despite this, determination of  $\log K_{ow}$  for ionisable chemicals and surfactants is empirically difficult due to their tendency to accumulate at the octanol-water interface. Predictive methods are also often unreliable [1].
- Octanol cannot adequately describe the interactions of polar, charged, or amphiphilic compounds within ordered 3D structures of biological membranes.
- $\log K_{MW}$  provides a more biologically realistic approach for these compound types.
- Experimental determination of  $\log K_{MW}$  can be complex and time consuming, therefore we have used coarse-grained simulation to predict  $\log K_{MW}$  and compare derived QSARs for non-polar narcotics.
- Building on our previously presented work with perfluoroalkyl acids (PFCAs), here we explore a new QSARs case study for anionic surfactants using both experimental and computational approaches for generating  $\log K_{MW}$ .

#### 3. $\log K_{MW}$ QSAR for Aquatic Toxicity

#### 2. Methods

- As non-specific toxicity (narcosis) is driven by critical accumulation in the phospholipid membranes, only chemicals with narcotic mode of action were used.
- Ecotoxicity data for the comparison of experimental and computational methods and two case studies were taken from external literature [2-5] and internal studies.
- Experimental  $\log K_{MW}$  data**
- Liposome, Immobilised Artificial Membrane (IAM) & Solid Supported Lipid Membrane (SSLM) are taken from internal and literature data [6-8]
- Predictive  $\log K_{MW}$  data**
- COSMOmic (developed by COSMOlogic [9]) was used to predict  $\log K_{MW}$ . Calculations were carried out using conformers generated from COSMOconf and micelle models from [10], using COSMOTHERM 2021.
- Simulation data were predicted using coarse-grained simulations, with the mapping and parametrisation scheme described in [11].

#### 4. Case Study – PFCAs

## Safety & Environmental Assurance Centre



### Review of PBK models for fish species of non-ionogenic compounds for use in Environmental Risk Assessment

Alessia Giorgis<sup>1</sup>, Tymoteusz Pietreko<sup>1</sup>, Enji Patrik<sup>1</sup>, George Fitton<sup>1</sup>, Bruno Campos<sup>1</sup>  
<sup>1</sup>Unilever, Research and Development, Sharnbrook, Bedford, MK44 1LQ  
 E-mail contact: alessia.giorgis@unilever.com

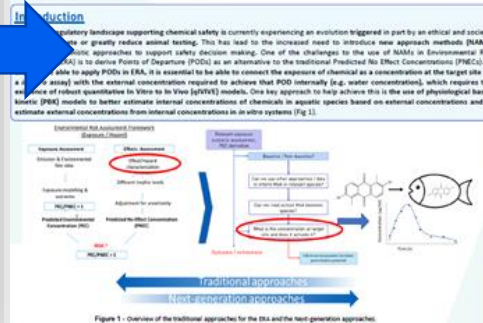


Figure 1 - Overview of the traditional approaches for the ERA and the next-generation approaches.



$$\frac{dC_{int}}{dt} = k_{in}C_w - (k_{out} + k_G + k_m)C_{int}$$

Figure 2 - Illustrative conceptual model of a one-compartment toxicokinetic model [1].

#### Chosen models from the literature

##### Mackay model

The model is a first order one-compartment toxicokinetic model. It was developed using 9 generic organic chemicals with different hydrophobicity ( $\log K_{ow}$  values from 0 to 8 with increasing molecular weight) applied to a 1g fish having lipid fraction of 5% for a 36-h test at 20 °C. [Fig 2] [4].

##### Hendricks model

The model is a one-compartment toxicokinetic model that combines both substance and species properties such as  $\log K_{ow}$ , the weight of an organism, lipid content and trophic level of a species in order to explain inter-substance and inter-species variability. In particular, the model describes the uptake of non-ionic chemicals that can pass the cell membrane via hydrophobic interactions onto the lipids [2].

##### Arnot and Gobas model

The model is a one-compartment model that provides an estimation of internal concentration from POCS generated using in vitro assays. The chemical concentration is described by the exchange between the surrounding medium (water) and the organism. The environmental conditions considered in the model are relevant environmental generic conditions [3].

## NC 3R<sup>s</sup> Innovation Platform

Exploiting 3Rs technologies

Home > CRACK IT Challenges

## CRACK IT Challenges



### Challenge 41 SAFE

Innovative bioassays for environmental risk assessment and fish toxicity.

In progress 2021

### Evaluating Predictive Toxicokinetic Models in *Daphnia magna* to Support Environmental Safety Decisions

Jacob-Joe Collins, Bruno Campos, Claudia Rivetti, Thomas Moxon, & Mark Viant

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# Genes to Pathways

## What?

**A workflow linking human genes to pathways across species to support improved exploitation of existing data for ERA.**

## Why?

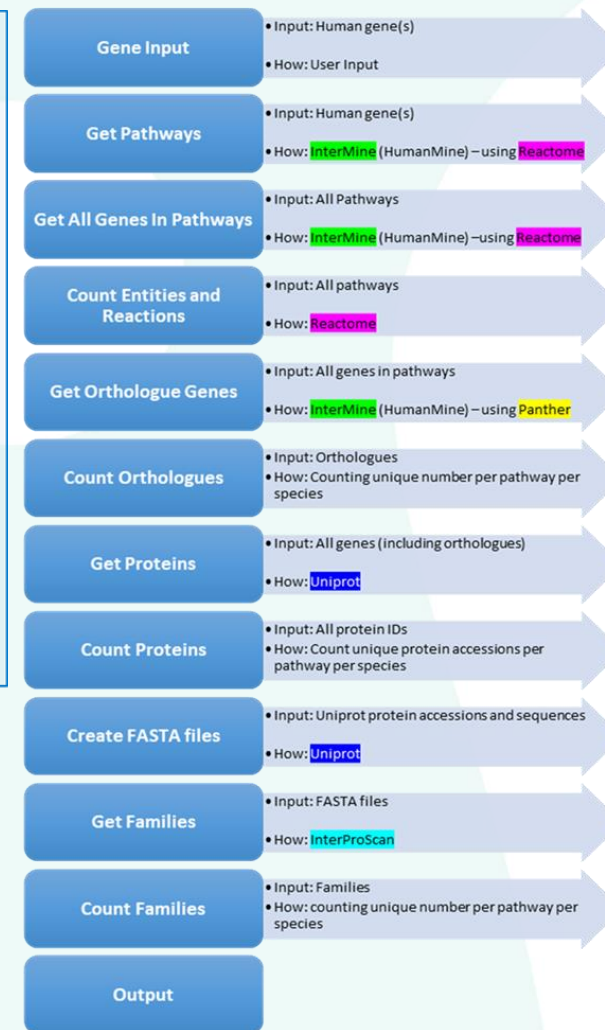
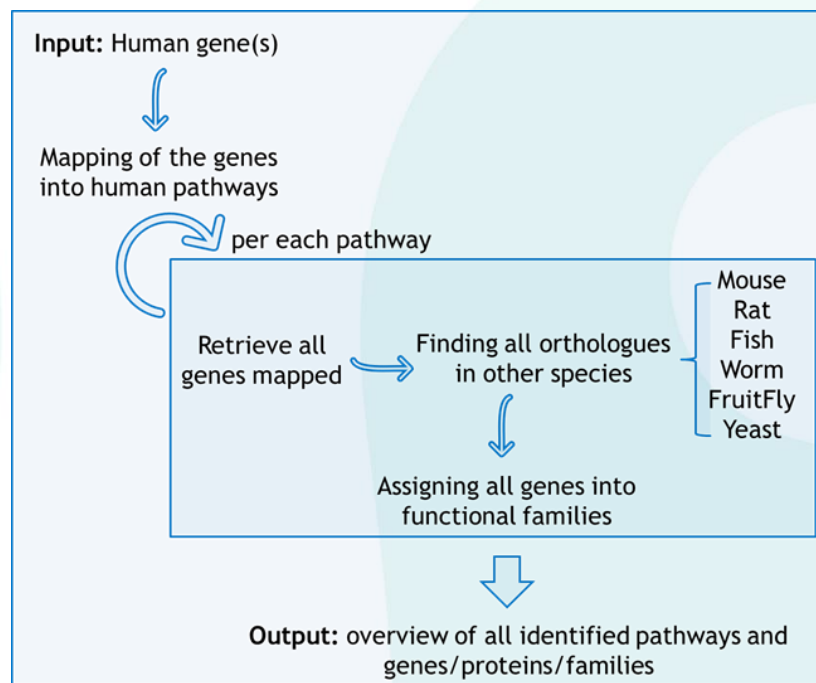
**It is critical to discern the conservation in physiological processes across species to predict response patterns and toxicity outcomes in the environment.**

## How?

Leveraging on the integrated use of molecular available data in a WoE approach to serve as a scaffold for a mechanistically-driven testing strategy and hazard characterization.

## When?

Publication in progress (code will be deposited on GitHub).



# Consortium to Advance Cross Species Extrapolation in Regulation



**Steering Committee:**  
 Carlie LaLone (US EPA)  
 Geoff Hodges (Unilever)  
 Nil Basu (McGill U)  
 Steve Edwards (RTI)  
 Fiona Sewell (NC3Rs)  
 Michelle Embry (HESI)

1. Define the taxonomic domain of applicability
2. Define the global regulatory landscape/need
3. Develop a bioinformatics toolbox
4. Communicate a shared scientific vision



## Environmental Toxicology and Chemistry

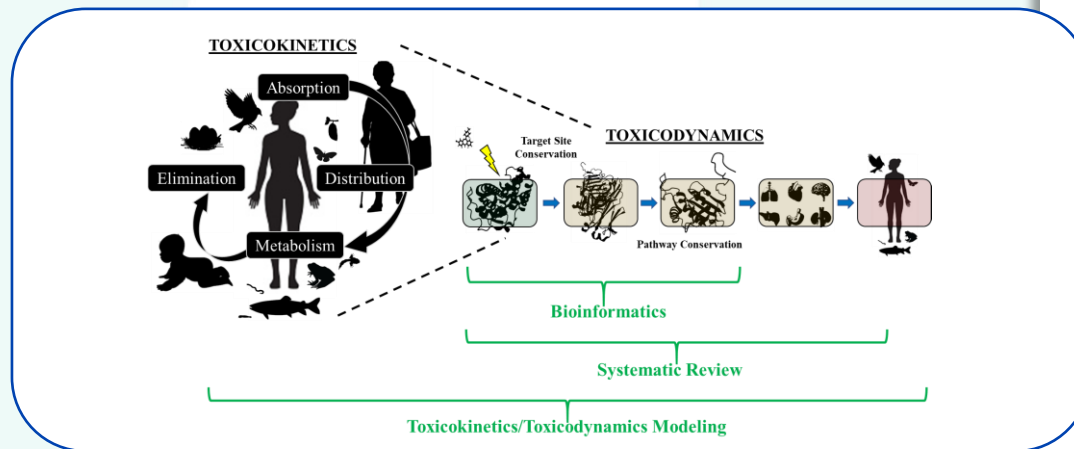
Focus Article | Full Access

### International Consortium to Advance Cross Species Extrapolation of the Effects of Chemicals in Regulatory Toxicology

Carlie A. LaLone, Niladri Basu, Patience Browne, Stephen W. Edwards, Michelle Embry, Fiona Sewell, Geoff Hodges.

First published: 22 September 2021 | <https://doi.org/10.1002/etc.5214>

Focus articles are part of a regular series intended to sharpen topics of interest to the scientific community. This article has been accepted for publication and undergone the copyediting, typesetting, pagination and proofreading process between this version and the Version of Record. Please cite this article as follows:



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**Case study**  
**A framework to demonstrate the applicability of New Approach Methodologies (NAMs) in Environmental Risk Assessment (ERA)**

**Unilever**  
**Safety & Environmental Assurance Centre (SEAC)**  
**Colworth Science Park, United Kingdom**



# Objectives

Evaluate the utility and the applicability of mechanistic-based information to complement and strengthen current ERA practices without the need for generating new animal data



- ✓ Assessing the availability, suitability and power of NAMs-based data
- ✓ Benchmark mechanistically-derived Points of Departure (PoD) to complement current ERA practices
- ✓ Use all data as part of a weight of evidence approach to provide increased confidence in decisions

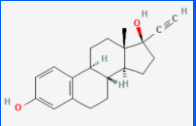
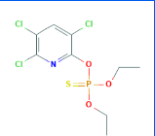
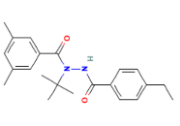
The integration of historical *in vivo* data and NAMs can build confidence in safety decision making



Insights will help gain better mechanistic understanding of potential expected toxicity effects

**Development of case studies to exemplify the applicability of the approach**

# Case studies

Compound	Ethinylestradiol (EE2) 	Chlorpyrifos (CPS) 	Tebufenozide* 
Use	Contraception	Pesticide	Insecticide
Mode of Action	Oestrogen receptor agonist	Acetylcholinesterase receptor agonist	Ecdysone receptor agonist
Expected sensitive species	Vertebrates	<i>Animalia</i>	Invertebrates

\* Case-study under development

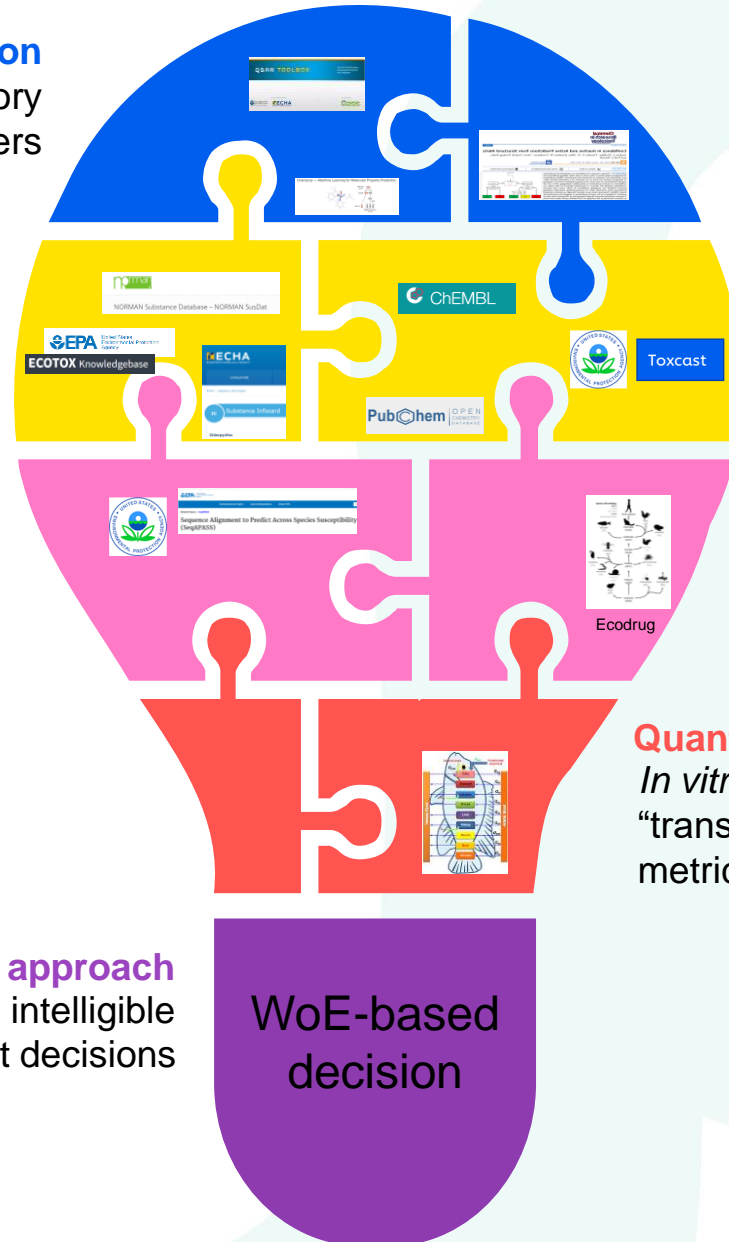


\*Note: These data are the property of Unilever Plc and cannot be shared without permission. It has been created for training purposes only and so may not reflect true experimental values. Unilever do not conduct fish testing including early life stage testing.

# Information gathering process

## Mode of Action identification

Using available scientific and regulatory information and *in silico* profilers



## Hazard Data

Including historical *in vivo* as well as *in vitro* data and *in silico* predictions to generate relevant Point of Departure (PoD)

## Species at risk identification

Use of publicly available tools and databases to identify susceptible species (based on targets and processes)

## Quantitative In Vitro to In Vivo Extrapolation

*In vitro* and *in vivo* exposures must be “transformed” into comparable exposure metrics requiring robust qIVIVE models

## Weight Of Evidence approach

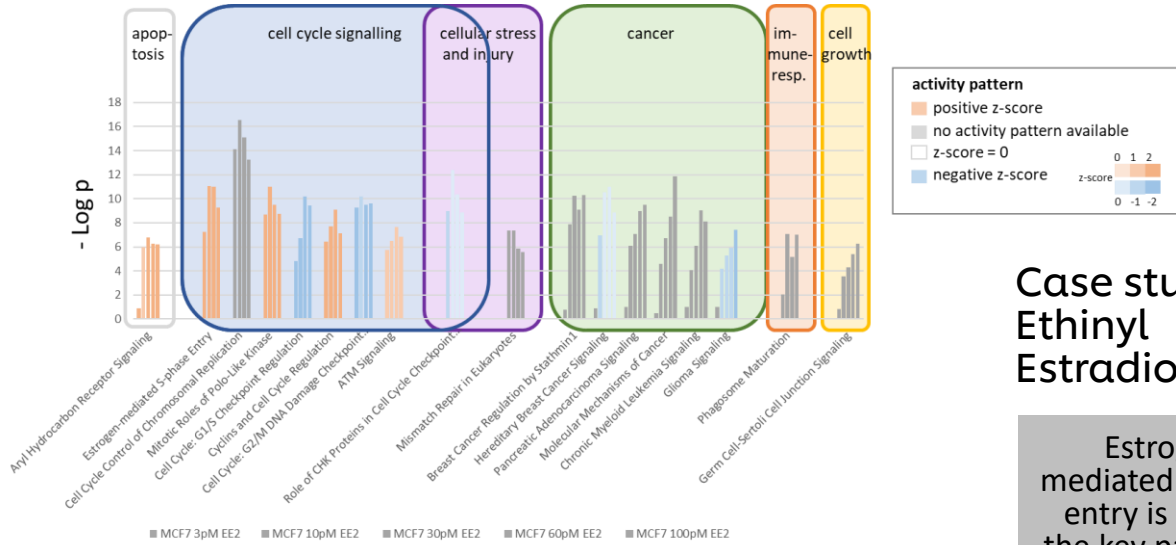
Collate all the information in an intelligible way to guide and support decisions

WoE-based decision



# Characterising hazard

## Canonical Pathway analysis



**Top 20 pathways predicted by Ingenuity Pathway Analysis (IPA) according to top p-value**

**Case study: Ethinyl Estradiol (EE2)**

Estrogen mediated s-phase entry is one of the key pathways but other pathways are also identified

## Microarray analysis



Aquatic Toxicology 79 (2006) 233–246



Hepatic gene expression profiling using GeneChips in zebrafish exposed to 17 $\alpha$ -ethynylestradiol

J.L. Hoffmann, S.P. Torontali, R.G. Thomsson, D.M. Lee, J.L. Brill, B.B. Price, G.J. Carr, D.J. Versteeg\*

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Received 22 March 2006; received in revised form 7 June 2006; accepted 9 June 2006

Abstract

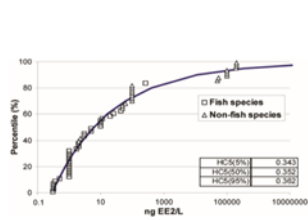
**NOTEL 168h\* = 15ng/L (50pM)**

**Pathway with lowest BMD at 168h: 23.23 ng/L (78pM)**

\*Threshold FC >2, p < 0.05, a cut of at FDR < 0.1 would change the numbers of DEGs but not the NOTEL

Hoffmann et al., (2006)

## Other literature information



**HC5 (50%) = 352 ng/L (1.2pM)**



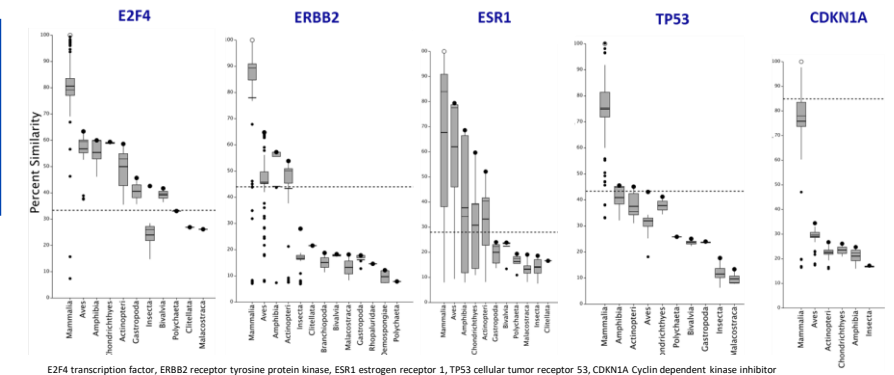
**EC50 = 0.03nM (30pM) (fish ER luciferase assay)**



Toxcast

## Taxonomic relevance

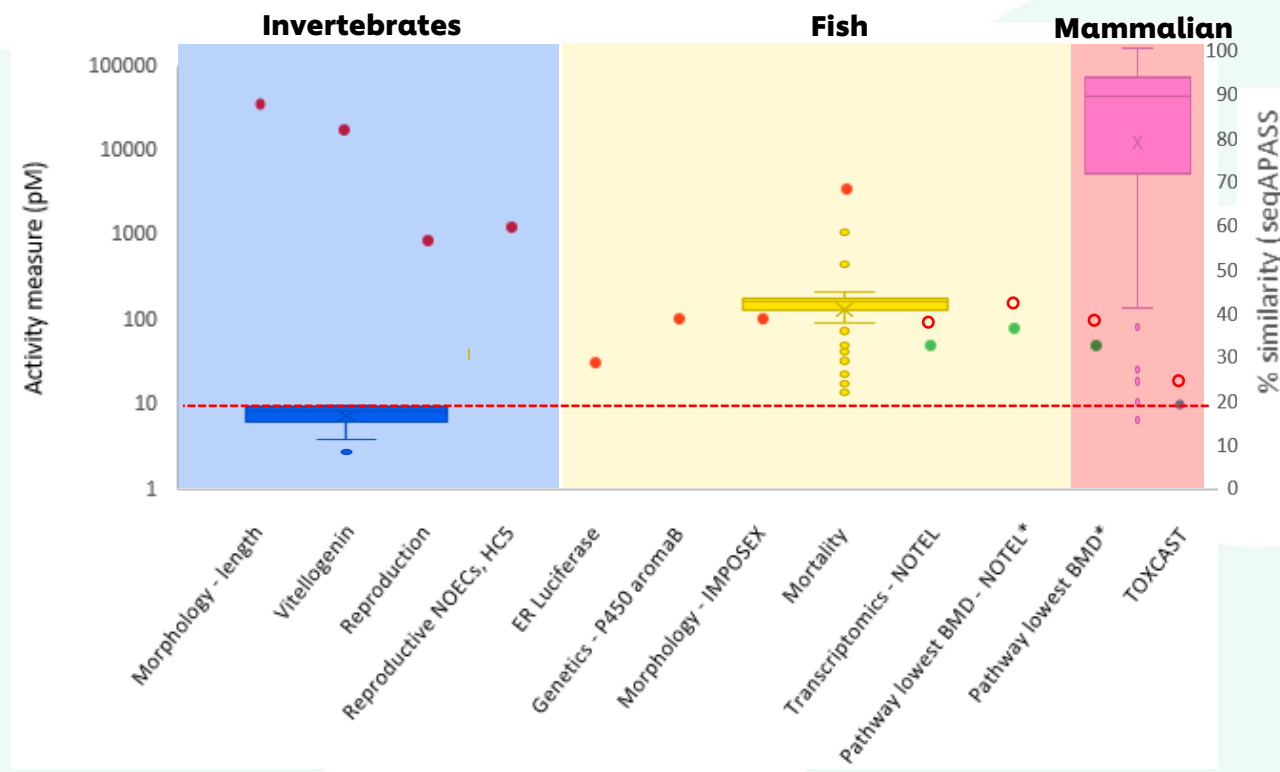
Sequence Alignment to Predict Cross Species Susceptibility (SeqPASS)



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# Previous case study: ethinylestradiol



- *In silico*
- *In vitro*
- *In vivo*
- *In vivo after reverse dosimetry calc*
- - - SEQapass act. threshold

## Microarray analysis



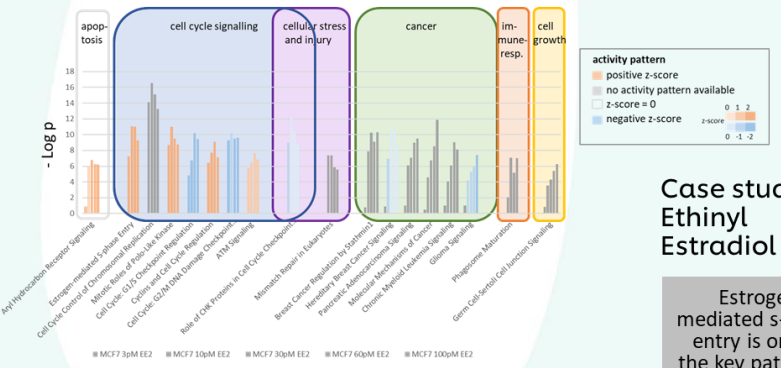
**NOTEL 168h\* = 50pM**

**Pathway with lowest BMD at 168h: 78pM**

\*Threshold FC > 2, p < 0.05, a cut of at FDR < 0.1 would change the numbers of DEGs but not the NOTEL

Hoffmann et al., (2006)

## Canonical Pathway analysis

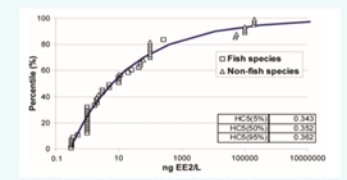


Top 20 pathways predicted by Ingenuity Pathway Analysis (IPA) according to top p-value

Case study: Ethinyl Estradiol (EE2)

Estrogen mediated s-phase entry is one of the key pathways but other pathways are also identified

## Literature information



HC5 (50%) = 1200 pM



EC50 = 30pM (ER luciferase assay)



\*Note: These data are the property of Unilever Plc and cannot be shared without permission. It has been created for training purposes only and so may not reflect true experimental values. Unilever does not conduct fish testing including early life stage testing.

# Key highlights

These case studies demonstrate that the integration of existing traditional *in vivo* data and *in vitro* functional assays from literature coupled with computational tools in a weight of evidence approach can build confidence in safety decision-making.

In summary :

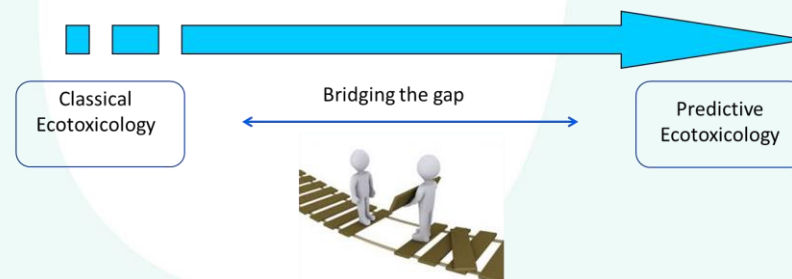
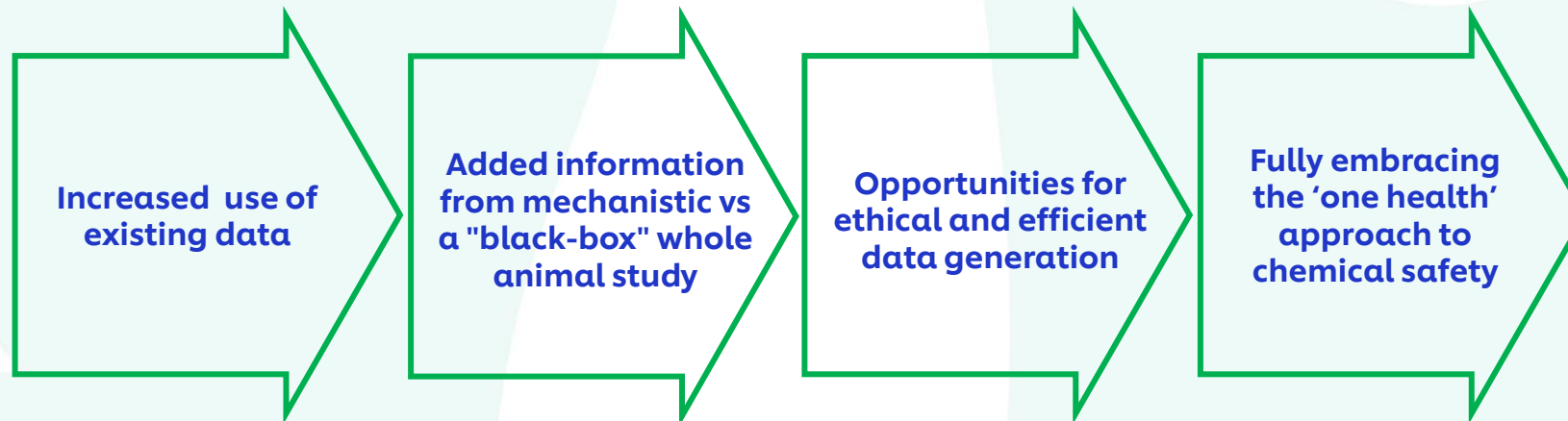
- ✓ Provides confidence that most sensitive species can be identified (in line with historical knowledge of chemicals);
- ✓ Species sensitivity is in line with MoA and target conservation throughout the tree of life;
- ✓ *in vitro* endpoints seem to be at least as protective as traditional *in vivo*.

# Take-home messages

## Challenges that needed to be addressed...

- Lack of standardised study designs may hinder data usage
- Challenges for data-poor chemicals
- No one-size-fit-all approach

## If solved can lead to...



# Real world applications of state of the art science



## Case study: renewable ingredients in Sunlight dishwash liquid



A new Sunlight dishwash liquid containing the renewable and biodegradable foaming ingredient called Rhamnolipid is a great example of our safety and sustainability scientists in SEAC working with R&D teams to create safe and sustainable products fit for a cleaner future.

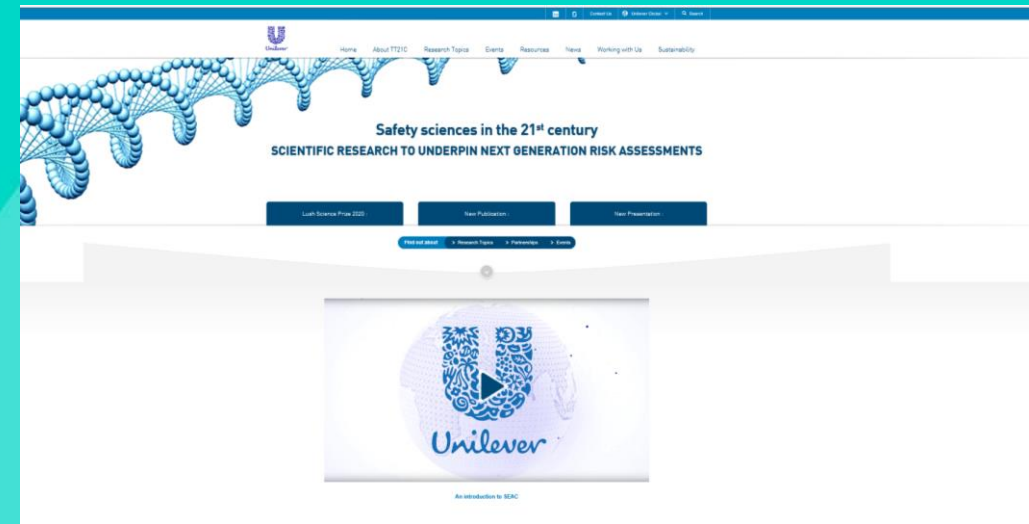
Our safety scientists, computational chemists and mathematicians used detailed knowledge of how people use hand dishwash liquid in different parts of the world alongside leading-edge non-animal approaches to generate new scientific evidence, which allowed us to show that the new Rhamnolipid based product is safe to use.

Our SEAC sustainability scientists assessed the environmental impacts of Rhamnolipids against existing surfactant ingredients in hand dishwash liquids derived from petrochemicals (such as fossil fuel or coal). This work showed that the innovation of swapping to use Rhamnolipid in hand dishwash liquid not only leads to a safe product with better cleaning performance but also one that is sustainable with less environmental impact.

<https://www.unilever.com/planet-and-society/safety-and-environment/safe-and-sustainable-by-design/>

# Questions?

- Emilia Gattas
- Amy Jupp
- Nicola Furmanski
- Jayne Roberts
- John Kilgallon
- Claudia Rivetti
- Geoff Hodges
- Alexandre Teixeira
- Chris Finnegan
- Ian Malcomber
- Juliet Hodges
- David Gore
- Roger van Egmond
- Maria Blanco-Rubio
- Alessia Giorgis
- Paul Carmichael
- Mathura Theiventhran
- Danilo Basili
- Predrag Kukic
- Iris Muller
- and many more



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