Incorporating expert knowledge in the Skin Allergy Risk Assessment (SARA) Model:

an integrated approach to testing and assessment (IATA) demonstrated in case studies











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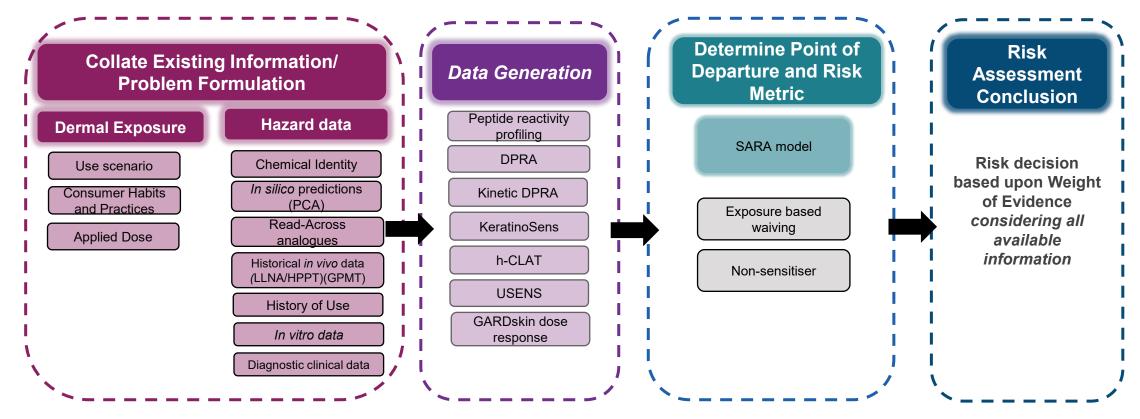
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Next Generation Risk Assessment (NGRA) framework for Skin Allergy

- Unilever NGRA framework designed to use a weight of evidence (WoE) based upon all available information, accommodate range of consumer product exposure scenarios and provide a quantitative point of departure (PoD) and risk metric
- Development of the Unilever Skin Allergy Risk Assessment (SARA) model





SARA Model - The Timeline

2017-2019

2019-2021

2021-2022

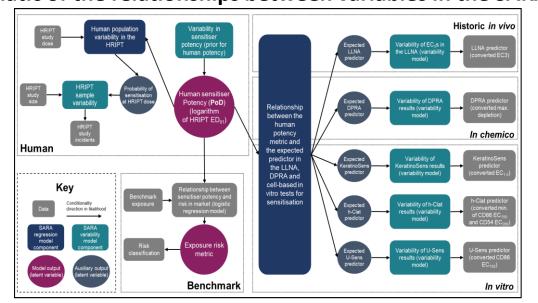
A prototype Bayesian statistical model was developed to estimate a noeffect-dose from human repeat insult patch test (HRIPT) data.

This model was published in Reynolds et al. (2019)*.

The model and database were revised and expanded. The point of departure became the ED_{01} .

SARA model published within a set of 3 papers#, exploring the model and its use in case study risk assessments.

Schematic of the relationships between variables in the SARA model



The use-case of the **SARA model** is to estimate:

- **1. PoD**: an ED₀₁, defined as the dermal dose (μ g/cm⁻²) required to sensitise 1% of a human population for a chemical of interest based upon chemical specific (primarily NAM) data
- **2. Risk Metric:** a probability that a consumer exposure to a chemical is 'low risk', conditional on the available data and the model

*Applying the Model: Practical Insights from Risk Case Studies

- 1. Reynolds et al. (2021). A hypothetical skin sensitisation next generation risk assessment for Regul Toxicol Pharmacol, coumarin in cosmetic products. 2022. DOI: https://doi.org/10.1016/j.vrtph.2021.105075
- 2. Reynolds et al. (2022). Decision making in next generation risk assessment for skin allergy: Using historical clinical experience to benchmark risk. Regul Toxicol Pharmacol. DOI: https://doi.org/10.1016/j.vrtph.2022.105219
- 3. Gilmour et al. (2022). Next generation risk assessment for skin allergy: Decision making approach methodologies. Regul Toxicol Pharmacol. DOI: https://doi.org/10.1016/j.yrtph.2022.105159



^{*}https://doi.org/10.1016/j.comtox.2018.10.004

SARA Model - Development Overview

2019-2021 2017-2019 2021-2022 2023 - 2025

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SARA model published within a set of 3 papers, exploring the model and its use in case study risk assessments.

Unilever began to update SARA and conducted an evaluation on the updated model.

SARA-ICE Defined Approach is included in the **OECD GL 497** in June 2025.

An expanded database on which to estimate model parameters.

Incorporation of new inputs:

- In silico/expert inputs in the form of reactivity and sensitiser/non-sensitiser classifications.
- The model now allows human maximization test (HMT) studies, in addition to human repeat insult patch test (HRIPT) studies.
- Reactivity rate estimates from the kinetic DPRA (OECD 442c) can now be used as in chemico inputs.

Revised model outputs:

- The updated model can now provide a **probability that a chemical is a sensitiser** conditional on the data used.
- The SARA risk metric takes into the account the **probability that a chemical is a non-sensitiser.**

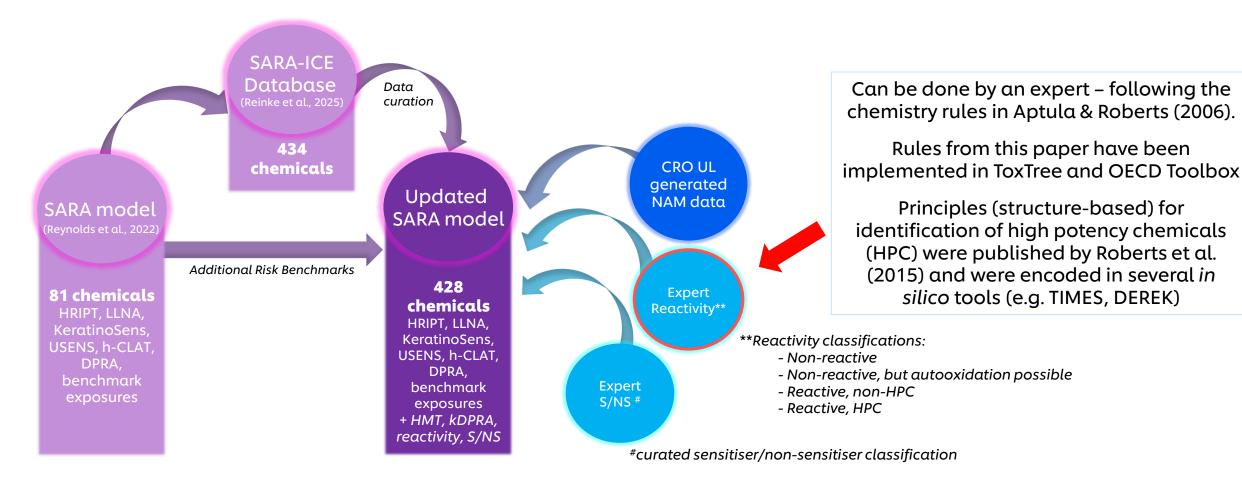
Increased speed of operation:

A "SARA-production" version of the model, an approximation of the full model from which potency estimates can be obtained much faster than previously.



^{*}https://doi.org/10.1016/j.comtox.2018.10.004

Database expansion & Mechanistic Classification of Skin Sensitisers



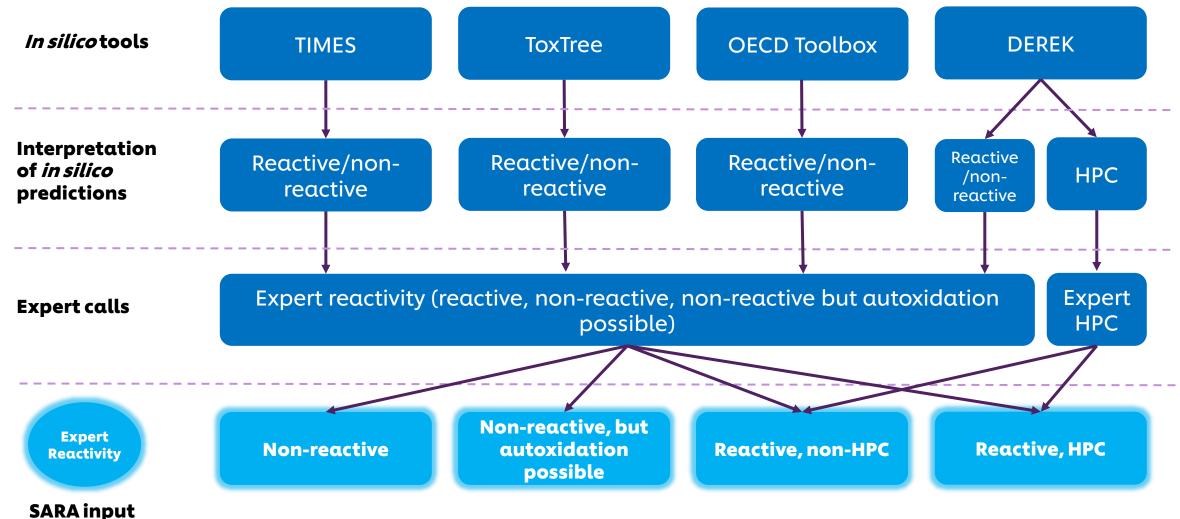


Reinke et al. (2025). The skin allergy risk assessment-integrated chemical environment (SARA-ICE) defined approach to derive points of departure for skin sensitization. Curr Res Toxicol. . DOI: https://doi.org/10.1016/j.crtox.2024.100205

Aptula & Roberts (2006). Mechanistic applicability domains for nonanimal-based prediction of toxicological end points: general principles and application to reactive toxicity. Chem Res Toxicol. DOI: https://doi.org/10.1021/tx0601004

Roberts et al. (2015). Principles for identification of High Potency Category Chemicals for which the Dermal Sensitisation Threshold (DST) approach should not be applied. Regul Toxicol Pharmacol. DOI: https://doi.org/10.1016/j.yrtph.2015.03.001

Determining expert reactivity classifications for SARA model

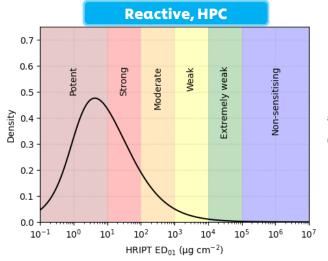


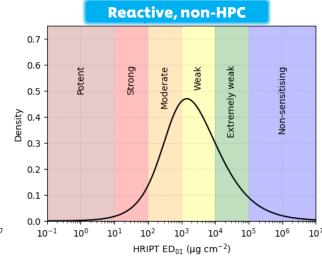


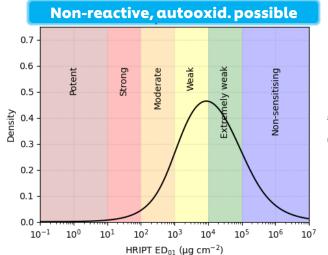
Addition of reactivity classifications to inform SARA model priors

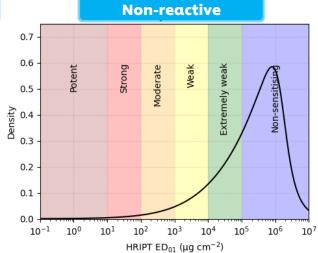
- Each chemical in the database now has a reactivity classification.
- Consensus reactivity classifications are based upon outputs of *in silico* tools and are expert curated.
- Possible classifications are "Reactive, HPC", "Reactive, non-HPC", "Non-reactive, but autooxidation possible" and "Non-reactive".
- The model learns an adaptive prior distribution for each of the four reactivity classifications.
- The reactivity prior distributions align well with the six potency classes defined by Gerberick et al. (2001): non-sensitising, extremely weak, weak, moderate, strong, potent.

Gerberick et al. (2001) **Understanding fragrance allergy using an exposure-based risk assessment approach**. Contact Dermatitis. DOI: https://doi.org/10.1034/j.1600-0536.2001.450603.x











Cross-validation

Cross-validation exercises were performed conditional on different sets of inputs. A decision model is proposed to translate the risk metric into classifications of "low risk", "high risk" or "inconclusive":

- 1. The model outperforms a traditional approach of Quantitative Risk Assessment (QRA)^a using dermal sensitisation thresholds (DST)^{b,c,d} when compared to SARA with reactivity-only inputs
- 2. Inclusion of *in vitro* inputs in addition to reactivity boosts performance further
- 3. Using in vivo inputs only, comparable performance with QRA but better protectiveness
- 4. SARA now exhibits far greater discriminatory power of the benchmark risk classifications than the previous versions of SARA

Input combination	Low-risk classification rate	High-risk classification rate	Average classification rate	Number of inconclusive classifications	Number of incorrect classifications
QRA DST	20 / 49, 41%	14 / 16, 88%	64%	15 / 65, 23%	16 / 50, 32%
SARA Reactivity information only	26 / 49, 53%	14 / 16, 88%	70%	18 / 65, 28%	7 / 47, 15%

Reynolds et al. (manuscript in preparation)

dNishijo et al. (2020). Application of the dermal sensitization threshold concept to chemicals classified as high potency category for skin sensitization assessment of ingredients for consumer products. Regul Toxicol Pharmacol, 117, 104732. doi:10.1016/j.yrtph.2020.104732



^aApi et al. (2020). **Updating exposure assessment for skin sensitization quantitative risk assessment for fragrance materials**. Regul Toxicol Pharmacol 118:104805. https://doi.org/10.1016/j.yrtph.2020.104805.

bSafford et al. (2011). Refinement of the Dermal Sensitisation Threshold (DST) approach using a larger dataset and incorporating mechanistic chemistry domains. Regul Toxicol Pharmacol, 60(2), 218-224. doi:10.1016/j.yrtph.2011.03.009

cSafford et al. (2015). Extension of the Dermal Sensitisation Threshold (DST) approach to incorporate chemicals classified as reactive. Regul Toxicol Pharmacol, 72(3), 694-701. doi:10.1016/j.yrtph.2015.04.020.

Gilmour et al. (2022) case study scenarios re-visited

Exposure

0.1% lactic acid in shampoo

2% lactic acid in face cream

2% geraniol in face cream

0.2% formaldehyde in face cream

Expected

outcome

SARA

(Reynolds et al., 2022: Gilmour et al..

2022)

Low risk

NAM Data: not available SARA prediction: not possible, apply QRA

Chem prediction: non-reactive

NESIL/SAF = AEL = 900/300= 30

AEL:CEL= 3 / 0.77 = 3.9

Risk outcome low risk

Low risk

Chem prediction: non-reactive NAM Data: negative

SARA prediction: NAM data

Chemicat	(µg cm ⁻²)	(µg cm ⁻²)	(µg cm ⁻²)
Lactic Acid	7,100	310,000	25,000,000

P exposure (low risk) 0.9

Risk outcome low risk

Low risk

Chem prediction: reactive (auto) NAM data: mixed

SARA prediction: NAM data

Chemical	ED ₀₁ 2.5 th	ED ₀₁ 50 th	ED ₀₁ 97.5 th
	(μg cm ⁻²)	(μg cm ⁻²)	(μg cm ⁻²)
Geraniol	180	4500	96,000

P exposure (low risk) 0.95

Risk outcome low risk

High risk

Chem prediction: reactive NAM data: positive

SARA prediction: NAM data

Chemical	ED01 2.5 th (µg cm²)	ED01 50 th (µg cm²)	ED01 97.5 th (μg cm²)
Formaldehyde	25	550	12,000

P exposure (low risk) 0.33

Risk outcome high risk

Updated SARA

(Reynolds et al. manuscript in preparation)

Chem prediction: non-reactive NAM Data: not available SARA prediction: reactivity info

	Chemical	ED ₀₁ 2.5 th (µg cm ⁻²)	ED ₀₁ 50 th (μg cm ⁻²)	ED ₀₁ 97.5 th (μg cm ⁻²)
ı	Lactic Acid	31,000	590,000	21,000,000

P(NS) = 0.63P exposure (low risk) = 0.97

Risk outcome low risk

Chem prediction: non-reactive NAM Data: negative

SARA prediction: reactivity + NAM data

	(µg cm ⁻²)	(µg cm ⁻²)	(µg cm ⁻²)
Lactic Acid	31.000	590.000	21.000.000

P(NS) = 0.91P exposure (low risk) ~1

Risk outcome low risk

Chem prediction: reactive (auto) NAM data: mixed

SARA prediction: reactivity + NAM data

	Chemical	ED ₀₁ 2.5 th (µg cm ⁻²)	ED ₀₁ 50 th (µg cm ⁻²)	ED ₀₁ 97.5 th (µg cm ⁻²)
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P(S) = 0.93P exposure (low risk) = 0.994

Risk outcome low risk

Chem prediction: reactive NAM data: positive

SARA prediction: reactivity + NAM data

Chemical	ED ₀₁ 2.5 th (μg cm ⁻²)	(µg cm ⁻²)	ED ₀₁ 97.5 th (µg cm ⁻²)
Formaldehyde	0.76	18	540

P(S) ~1.

P exposure (low risk) = 0.008

Risk outcome high risk



ED₀₁ 97.5th

Conclusions

- SARA model now incorporates additional input information, including reactivity classifications.
 - Improved decision making for consumer goods; allowing consistent integration of information across a range of data inputs (in silico, in chemico, in vitro, in vivo) with quantified uncertainty.
- The reactivity prior distributions align well with the six potency classes defined by Gerberick et al. (2001): non-sensitising, extremely weak, weak, moderate, strong, potent.
- Performance using reactivity classifications only, against benchmark exposure classifications, shows a higher average high/low risk classification rate with fewer incorrect classifications made, versus a QRA approach using dermal sensitisation thresholds.
- Publication to share updates to the model to follow.
- Continue to build SARA model and to include other parameters.



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