# Next Generation Risk Assessment for Occupational Chemical Safety – a Real-World Example with Sodium-2-hydroxyethane sulfonate

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#### **Overview**

- 1. Current approaches for worker safety assessment.
- 2. External landscape
- 3. Overview of NGRA for systemic toxicity assessment.
- 4. Case study chemical: Sodium-2-hydroxyethane sulfonate (SI)

#### Looking to the future:

- EU roadmap toward phasing out animal testing and REACH 2.0







#### Historical worker safety assessment (systemic toxicity)

Typically, risks from occupational exposures are determined via comparison with occupational limit values, e.g., occupational exposure limits (OELs) or Derived No-effect levels (DNELs).

Large number of OELs/DNELs based on studies performed using experimental animals.

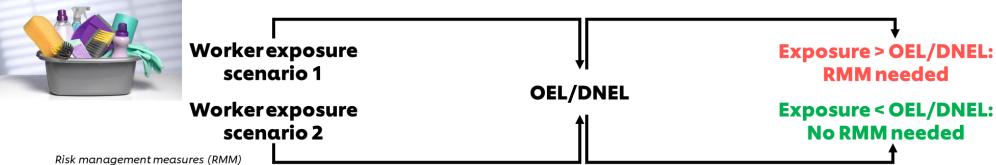
Paradigm based on animal testing increasingly challenged scientifically and societally.











#### Opportunities for improved occupational risk assessments

Reliance on animal testing for worker safety assessment has been reduced, e.g. local toxicity, however, systemic safety assessment remains largely reliant on animal testing.

In addition, several, worker safety, regulatory texts are based on tonnage-driven testing requirements, e.g. EU REACH which has...:

- 1. Questionable coverage of certain effects at low tonnage bands (e.g. DART)
- 2. Questionable correlation between tonnage exposure risk.

High-throughput (non-animal) methods offer an opportunity for more informative, faster occupational risk assessments

Claessens et al. Journal of Occupational Medicine and Toxicology https://doi.org/10.1186/s12995-025-00456-7

(2025) 20:10

Botham et al., Archives of Toxicology (2023), 97: 30753082

Journal of Occupational Medicine and Toxicology

#### REVIEW

Open Access

Risk assessment and management of chemical hazards for pregnant workers: a qualitative review of guidance from EU member states

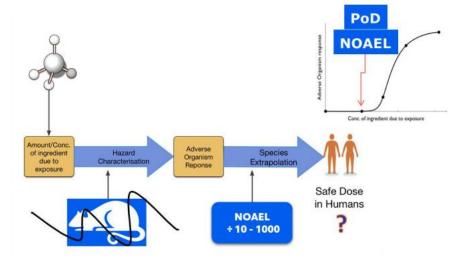


Thomas Claessens<sup>1\*</sup>, Karin Sørig Hougaard<sup>2,3</sup> and Steven Ronsmans<sup>1</sup>



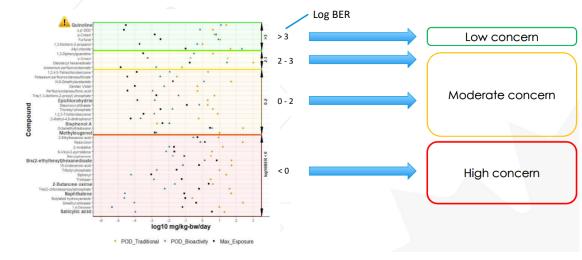
#### **Next Generation Risk Assessment (NGRA)**

- Same underlying paradigm for risk assessment (hazard ID, characterisation, exposure estimation and risk characterisation).
- Hazard ID/characterisation instead based on integrating non-animal methods (NAMs), e.g. in silico, in vitro, in chemico.
- Risks characterised in same manner, i.e. comparison of NAM PoDs with exposure estimate – the 'bioactivity exposure ratio (BER)'
- Likely to be used in a tiered manner, where depending on risk characterisation output, increasing attention may be paid to mechanistic interpretation.



Historical (animal-based) risk assessment paradigm

#### BIOACTIVITY EXPOSURE RATIO (BER) - EXAMPLE FROM SCIAD







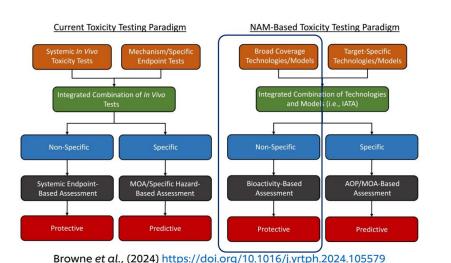
# State of the art (>20-years)

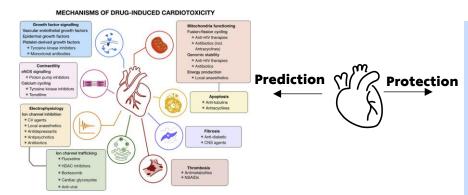
#### NAM development - protection vs prediction

Rapid development of NAMs for use in risk assessment. Two alternate philosophies:

- 1.) NAMs that measure early biological changes (irrespective of toxicological significance) which are used in a way that ensures estimated exposures fall below such changes (protection).
- 2. NAMs developed to predict (possibly quantitatively) adverse effects

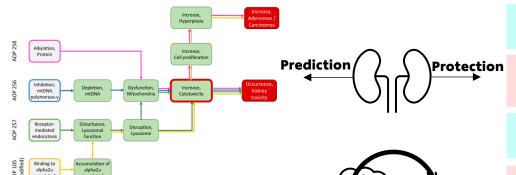
Both have a place in future risk assessment ar both likely to be used in a tiered manner





Manoshina et al., (2021). Cell Reports Medicine. 2:3 100216

NAMs
capturing
early
biological
changes
protective of
apical effects



Mally and Jarzina (2022). Frontiers in Toxicology

"There are 78 major human organs; let's say there are five different ways in which chemicals could be toxic to each one (an underestimate); and let's say we need five key events (including a molecular initiating event) measured across each IATA with new in vitro tests. That's around 2000 assays conducted at just one dose and at one time point for complete human AOP-driven biological coverage." Carmichael et al., (2022), Altex, 39:3

Limited coverage approaches

Cell based/reporter assays

Data rich approaches

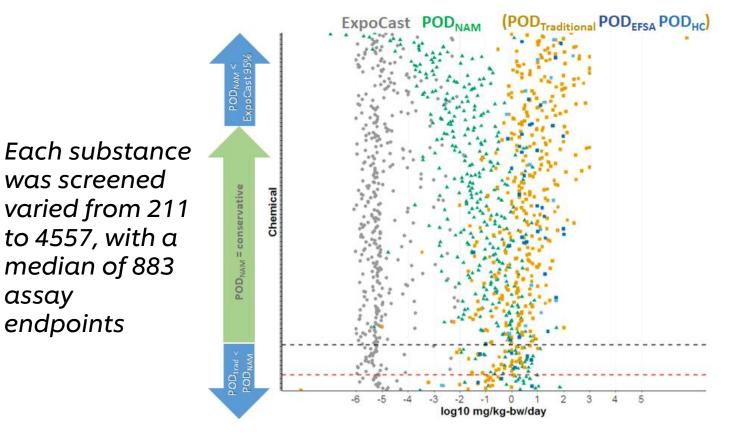
Transcriptomics

Cell painting



#### Value of approach for large subset of chemicals

Human PODs Exposure NAMs Animal





414/448 chemicals = 92% of the time this naïve approach appears conservative

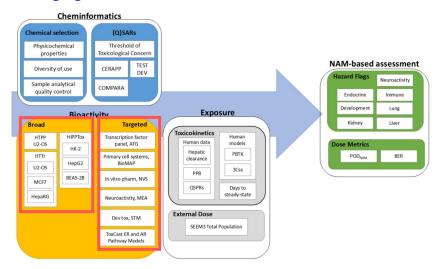
Case Studies Demonstrating
Application of Bioactivity as a
Protective POD

'... understanding how construction of NAM-based POD estimates may offer equivalent levels of public health protection as the PODs produced by animal methods ...' Paul Friedman *et al*, 2023, Computational Toxicology, 28, 10028

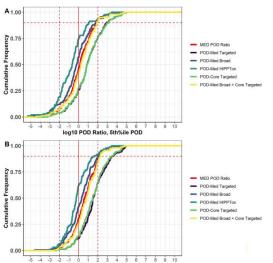




#### **Support?**



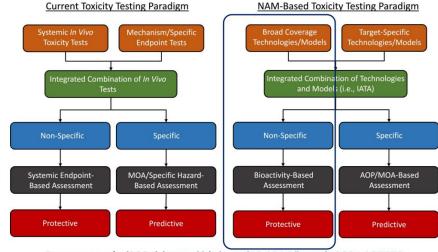




Unilever

"vertical dashed red lines indicate ±2 log10-mg/kg/d, between which 85% and 83% of POD ratios fall in (A) and (B), respectively"

In other words, 83 or 85% of PoD ratio (PoD NAM (median)/PoD traditional (5<sup>th</sup> or 25<sup>th</sup> percentile) were within ±2 log10-mg/kg/d of each other, i.e. ±2 orders of magnitude (100-fold).

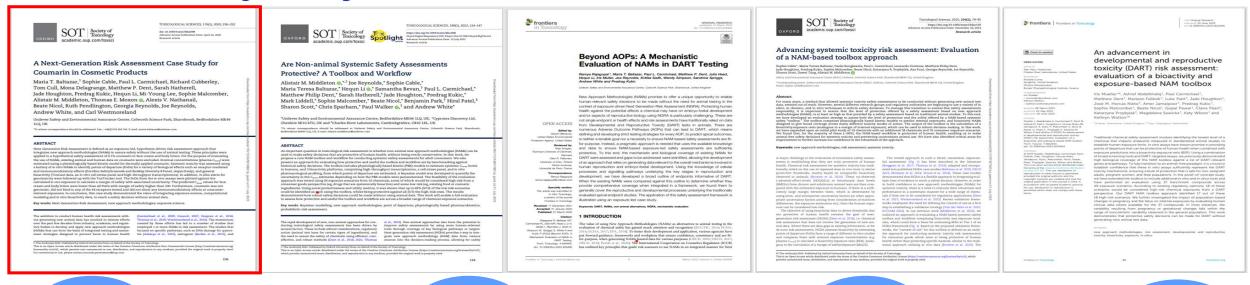


Browne et al., (2024) https://doi.org/10.1016/j.yrtph.2024.105579

Paul Friedman et al., 2025. Toxicol. Sci 205(1), 74-105



#### Unilever's NGRA journey: Case studies > toolbox evaluations > real-world use



2020 2024 2025

First NGRA case study on Coumarin Toolbox and workflow for conducting NGRA established with threshold BER for decision making

Conceptual
DART toolbox
and workflow
established

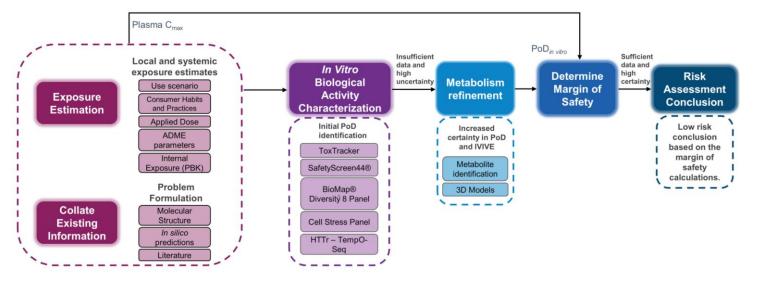
Evaluation of toolbox, workflow and BER threshold. Encouraging results (>95% protectiveness)

Toolbox and workflow for DART established (Muller et al., (accepted)



Confidence with models, best practice and ability to apply to different sectors (from consumer>worker)

# Translating principles to practice with case studies



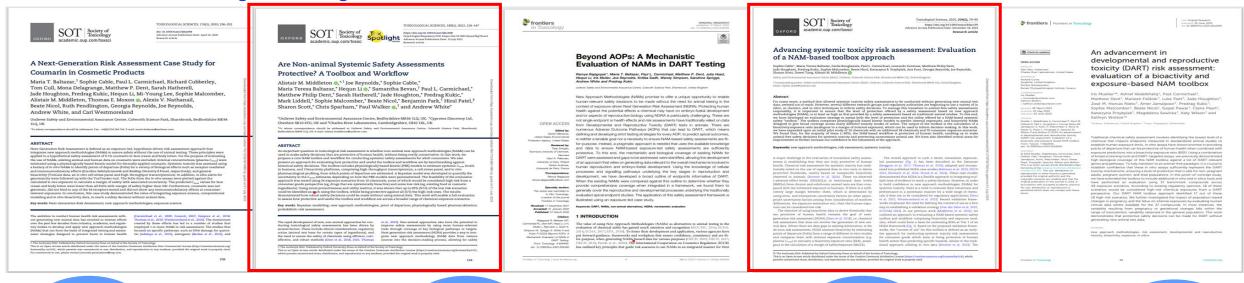


- Principles around using high-throughput test batteries translated to case study in 2020.
- Demonstrated feasibility of approach based on realistic test battery.
- In recent years, further case studies have been published following similar principles.
- Shift has been needed from case-studies to larger evaluations with larger numbers of chemicals.



#### 11

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#### Unilever systemic toolbox evaluations

To evaluate the value of a pragmatic suite of NAMs for making protective safety decisions, a **'toolbox'** and **'workflow'** has been **established** and **evaluated**, entailing:



#### Are Non-animal Systemic Safety Assessments Protective? A Toolbox and Workflow

Alistair M. Middleton , "1 Joe Reynolds," Sophie Cable,"
Maria Teresa Baltazar, 'Hequn Li , Samantha Bevan, 'Paul L. Carmichael, 'Matthew Philip Dent, 'Sarah Hatherell, 'Jade Houghton, 'Predrag Kukic,' Mark Liddell, 'Sophie Malcomber, 'Beate Nicol, 'Benjamin Park,' Hiral Patel, 'Sharon Scott,' Chris Sparham, 'Paul Walker , and Andrew White'

"Unilever Safety and Environmental Assurance Centre, Bedfordshire MK44 1LQ, UK; <sup>†</sup>Cyprotex Discovery Ltd, Cheshire SK10 4TG, UK and <sup>‡</sup>Charles River Laboratories, Cambridgeshire, CB10 1XL, UK

<sup>3</sup>To whom correspondence should be addressed at Unilever Safety and Environmental Assurance Centre, Colworth Science Park, Sharnbrook, Bedfordshire MK44 11Q, UK. E-mail: allstair.middleton@unilever.com.

✓ Toolbox of NAMs established

 Exposure (24) and risk classifications for 10 chemicals

✓ BERs calculated for all chemicals/exposures

PBK parameterization level

L1 (in silico parameters)

L2 (at least 1 in vitro parameter)

L3 (model calibrated to human clinical data)

BER threshold

110

2.5

✓ Threshold BER proposed

2024

2022



Toxicological Sciences, 2025, 1–17
https://doi.org/10.1093/toxsci/kfae159
Advance Access Publication Date: December 18, 2024
Research article

#### Advancing systemic toxicity risk assessment: Evaluation of a NAM-based toolbox approach

Sophie Cable\*, Maria Teresa Baltazar, Fazila Bungiawala, Paul L. Carmichael, Leonardo Contreas, Matthew Philip Dent, Jade Houghton, Predrag Kuici, Sophie Malcomber, Beate Nicol, Katarzyna R. Przybyłak, Ans Punt, Georgia Reynolds, Joe Reynolds, Sharon Scott, Dawei Tang, Alistian M. Middleton G.

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BERs calculated for 38 chemicals (70 exposure scenarios)

✓ Protectiveness (>90%) and utility (~<30%) determined</p>

PBK level	Protectiveness	Utility
 L1	93% (43 out of 46)	8% (2 out of 24)
L2	93% (43 out of 46)	27% (6 out of 22)
L3	98% (40 out of 41)	0% (0 out of 3)
Highest	96% (44 out of 46)	29% (7 out of 24)

 Comparisons with animal PoDs for same substances



Protectiveness = correct identification of a high-risk exposure scenario as high risk.
 Utility = vice versa

#### Unilever's NGRA journey: Case studies > toolbox evaluations > real-world use



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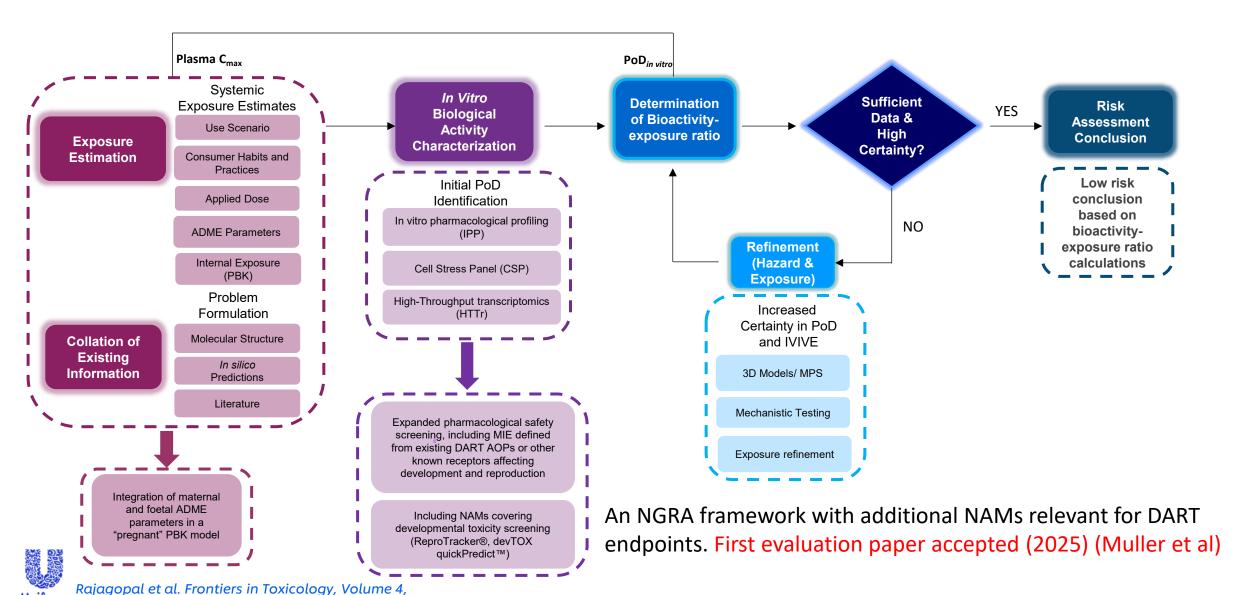
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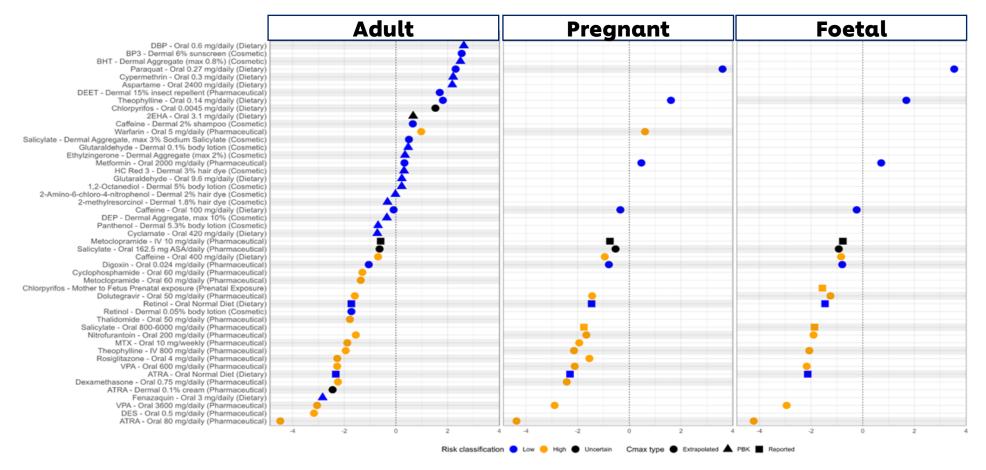
Confidence with models, best practice and ability to apply to different sectors (from consumer>worker)

#### Integrating DART Safety Assessment into Existing NGRA Framework:



March 2022,

# The DART framework is protective for most high-risk scenarios when using a BER threshold of 1



- > 16 of the 17 high risk exposure scenarios, as determined by traditional risk assessment methods, are identified as uncertain risk in our NGRA approach (yellow, BER<1)
- > 17 of the 27 low risk exposure scenarios are identified as well in the NGRA framework as low risk using our framework (blue, BER > 1).



### Application of NGRA to occupational safety assessment - challenges...

 Simultaneous exposure over multiple routes (dermal and inhalation) and limited biomonitoring data to calibrate PBK models.

Different exposure estimation models.

 Large number of scenarios to consider (factory, professional, cleaning etc).

Complex supply chains and ways of working under worker safety regulations (lead registrant/confidential information).



Perceived industry challenges for uptake of occupational NGRA

↑ Complexity ↑ Resource

Uncertainty Confidence
Regulatory acceptance

Conservatism

Case studies needed to improve confidence of chemical sector with NGRA and to address worker safety specific challenges that make its uptake more challenging from a (non) technical perspective.



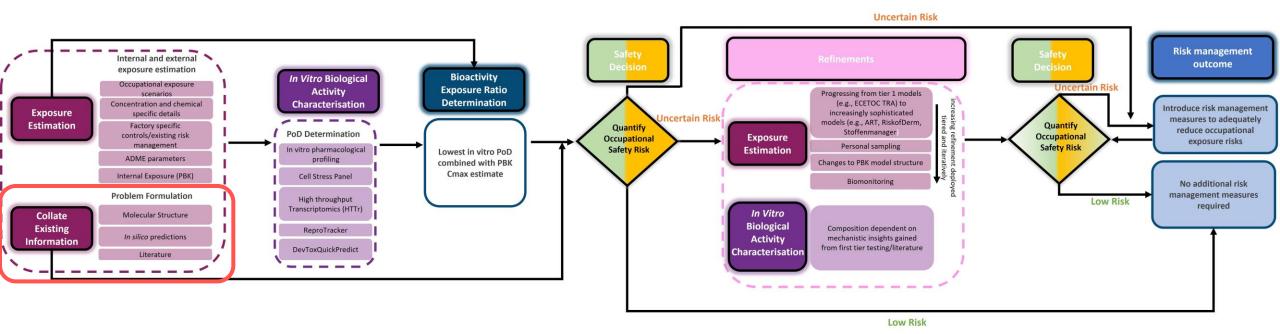
Anders Bergqvist b, Eleanor Burgess-Allen c, Ian Callan

Benjamin Carrick<sup>e</sup>, Graham Ellis<sup>f</sup>, Roberto Ferro<sup>8</sup>, Katy Goyak<sup>h</sup>

"there is a fear, or assumption, that nonanimal methods will be rejected by regulators, borne out of experience that they must provide information directly equivalent to that of animal tests."

Chantal Smulders', Ricky A. Stackhouse', Espe Troyal Serrano Ramón''', Vanessa Rocha'', Xiaoling Zhang k

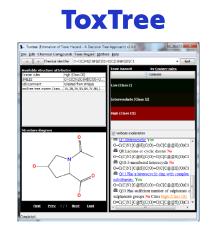
#### **Problem formulation**

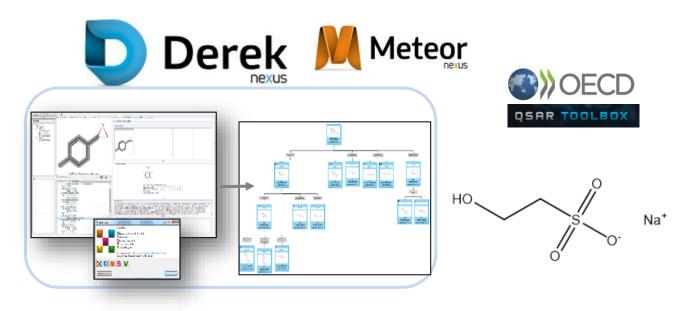




#### Problem formulation, in silico predictions and literature data

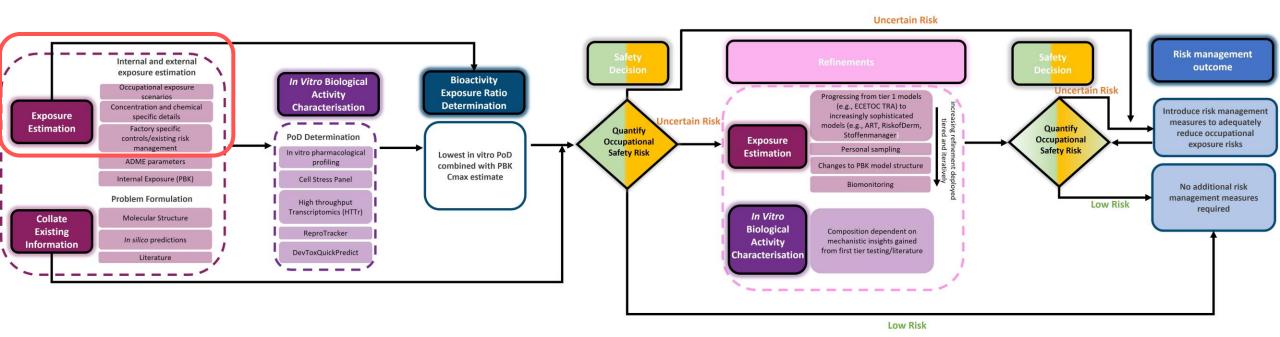
- Sodium-2hydroxyethane sulfonate (SI) is widely used in the manufacture of alkyl isethionate surfactants.
- Historical toxicology studies: 90-day oral (NOAEL: 200 mg/kg bw/day) and developmental toxicity (rats) (NOAEL: >1000 mg/kg bw/day).
  - Comprehensive in silico profiling performed Lack of any concerns.





	Biotransformation Name		General	I ED		DART		Carcinogenicity		Genotoxicity		Irritation	Protein Binding	Chromosome Damage	DNA Binding			
SMILES		Phase	Derek Nexus	OPERA	VEGA	Derek Nexus	VEGA	OECD QSAR Toolbox	Derek Nexus	OECD QSAR Toolbx	Derek Nexus	OECD QSAR Toolbox	VEGA	TIMES	Derek Nexus	OECD QSAR Toolbox	VEGA	OECD QSAR Toolbox
OCCS(O)(=O)=O	SI parent	N/A	N	N	N	N	N	N	N	N	N	N	N*	N	N	N	N	N
OC(CS(O)(=O)=O)=O	Oxidation of Primary Alcohols	Phase I	N			N			N		N			N	N			
OC1C(OCCS(O)(=O)= O)OC(C(O)C1O)C(O) =O	Glucuronidation of Primary and Secondary Aliphatic and Benzylic Alcohols	Phase II	N			N			N		N			N	N			
 OS(OCCS(O)(=O)=O)( =O)=O	O-Sulphonation of Aliphatic Alcohols	Phase II	N			N			N		N			N	N			

#### Exposure assessment - external:





#### External exposure assessment:

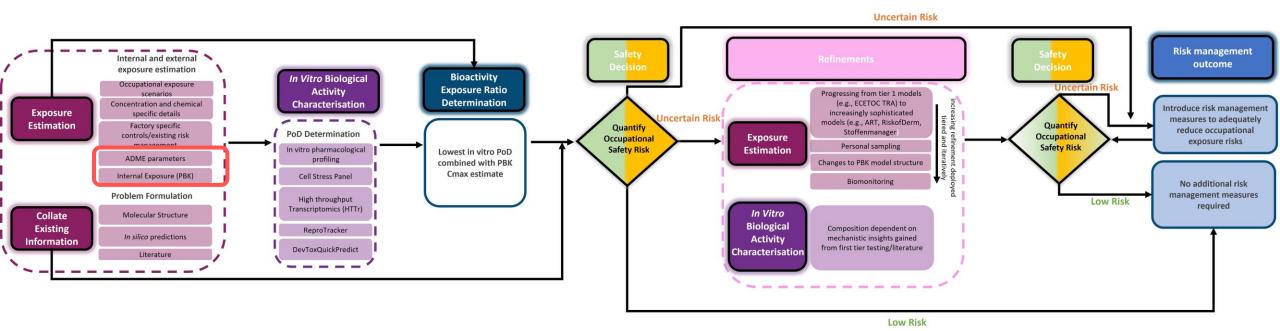
- Life cycle assessment performed to identify relevant scenarios of use (process categories/PROCs).
- From these PROCs, exposures are typically estimated using variety of modelling software packages (e.g., ECETOC TRA, ART etc).
- Although worker exposure to SI occurs from a limited number of scenarios, approach can still be followed for more complex supply chains.
- External exposure estimates serve as inputs to SI specific PBK model.

PROC number:	Description:						
	Chemical production or refinery in closed process						
PROC 1	without likelihood of exposure or processes with						
	equivalent containment conditions.						
	Chemical production or refinery in closed continuous						
PROC 2	process with occasional controlled exposure or						
	processes with equivalent containment conditions						
	Manufacture or formulation in the chemical industry						
PROC 3	in closed batch processes with occasional controlled						
111003	exposure or processes with equivalent containment						
	condition						
PROC 4	Chemical production where opportunity for exposure						
	arises						
PROC 5	Mixing or blending in batch processes						
PROC 7	Industrial spraying						
PROC 8a	Transfer of substance or mixture (charging and						
	discharging) at non-dedicated facilities						
PROC 8b	Transfer of substance or mixture (charging and						
	discharging) at dedicated facilities						
PROC 9	Transfer of substance or mixture into small containers						
	(dedicated filling line, including weighing)						
PROC 13	Treatment of articles by dipping and pouring						
PROC 14	Tabletting, compression, extrusion, pelletisation,						
DD0C45	granulation						
PROC 15	Use as laboratory reagent						
PROC 21	Low energy manipulation and handling of substances						
	bound in/on materials or articles						
PROC 28	Manual maintenance (cleaning and repair) of						
	machinery						

Exposure Scenario	PROC 1	PROC 2	PROC 3	PROC 4	PROC 5	PROC 7	PROC 8a	PROC 8b	PROC 9	PROC 13	PROC 14	PROC 15	PROC 21	PROC 28
Manufacture of substance	V	V	$\overline{\mathbf{A}}$					Ø				$\overline{\mathbf{A}}$		
Use as Intermediate	V	V	$\overline{\mathbf{A}}$					Ø	Ø			$\overline{\mathbf{A}}$		Ø
Formulation	V	V	Ø	Ø	Ø	Ø	Ø	Ø	Ø		Ø	Ø		
Repacking		V						Ø						
Use in Printing inks							Ø							
Use as processing aid	V	V	Ø	V			Ø	Ø						
Service Life of fabrics														_



### **Exposure assessment - internal:**





#### Internal exposure assessment - PBK

- Worst-case
   exposures were
   selected by
   consultant using
   simple procedure.
- Procedure converts inhalation and dermal exposures into an intravenous infusion.

Worker contributing scenario	Dermal exposure estimate	Inhalation exposure estimate	Max total time per day (TT)	Duration per occasion	Frequency	-	Exposure rate inhalation	Rate of systemic exposure from dermal	Rate of systemic exposure from inhalatio n	Total systemic exposure rate	Total dose/day	GastroPlus infusion dose/occasion
PROC 8b 'Transfer into	mg/kg bw/day	mg/m³	h	h	per day	mg/h	mg/h	mg/h	mg/h	mg/h	mg	mg
drums – indoor'	0.034	0.38	8	8	1	0.26	0.47	0.00043	0.47	0.47	3.75	3.75

**Step 1:** Conversion of dermal exposure estimate to dermal exposure rate

**Inputs:** Duration of exposure and bodyweight

Output: mg/h

**Step 2:** Conversion of inhalation exposure estimate to inhalation exposure rate

**Inputs**: Duration of exposure and volume of air intake/worker

Output: mg/h

#### Uncertainty table - inhalation bioavailability in tier 1 NGRA

Exposure assessment input	Tier 1 strategy	Impact on risk assessment	Capability need
Inhalation bioavailability	Treated as 100%	↓↓ Real value likely to be much lower	Inhalation bioavailability models (factory relevant)



**Step 3:** Accounting for dermal bioavailability for dermal exposure:

**Input:** dermal exposure rate \* dermal bioavailability

Output: mg/h

Step 6: Total dose/day

**Step 4:** Accounting for inhalation

bioavailability\*\* for inhalation exposures:

**Input**: Inhalation exposure rate \* inhalation

bioavailability

Output: mg/h

**Step 5:** Total aggregate exposure

(inhalation + dermal)

**Input:** Altered inhalation exposure rate +

altered dermal exposure rate

Output: mg/h

**Input:** Aggregate exposure rate multiplied by duration of exposure

Output: mg/day

Procedure is described in detail in Wood et al (2024)

#### Internal exposure assessment - PBK

- 3 PBK simulation types pregnant individual, worker and pregnant population.
- Models built using SI specific ADME data, e.g., hepatic metabolism using standard protocols.
- Probabilistic models ranges for uncertain parameters (e.g., fraction unbound)/variable population parameters (e.g., blood flows).

#### 

# PBK types

#### **Deterministic**

Fixed physiological values

Fixed parameter values

# Probabilistic 1 (pop variability)



Variable physiological values

Fixed parameter values

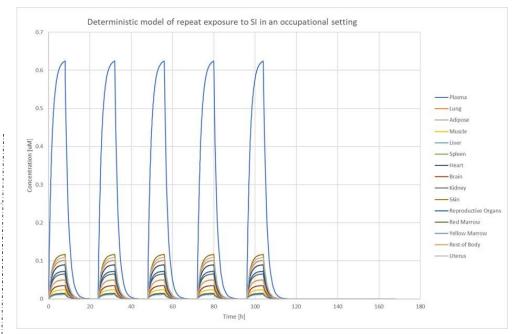
#### Probabilistic 2 (pop variability + parameter uncertainty)



Variable physiological values

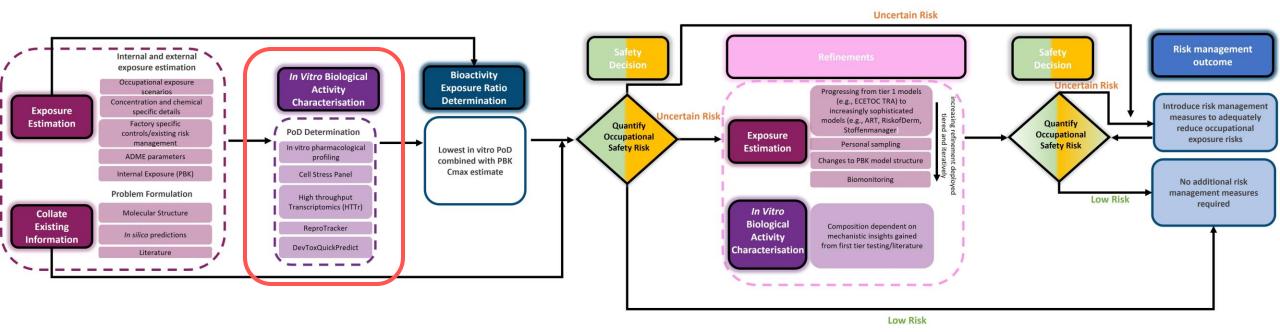
Variable parameter values

Complexity





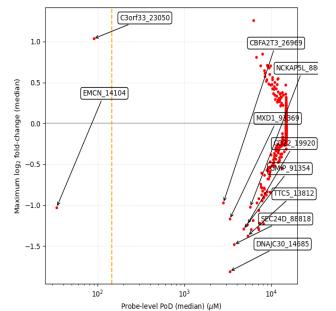
## In Vitro Biological Activity Characterisation



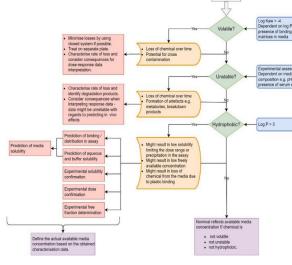


#### Limited bioactivity across 5 NAM assays:

- SI showed limited bioactivity across all assays.
- Lowest PoD transcriptomics (MCF-7 cell line), based on a single probe significantly more sensitive than others.
- Some deviation from nominal concentration was observed in dose-confirmation assays due to a dosing error. PoD adjusted based on achieved concentrations to increase confidence in QIVIVE.
  - Final PoD taken forward =  $104 \mu M$ .



#### Workflow for in vitro disposition data needs

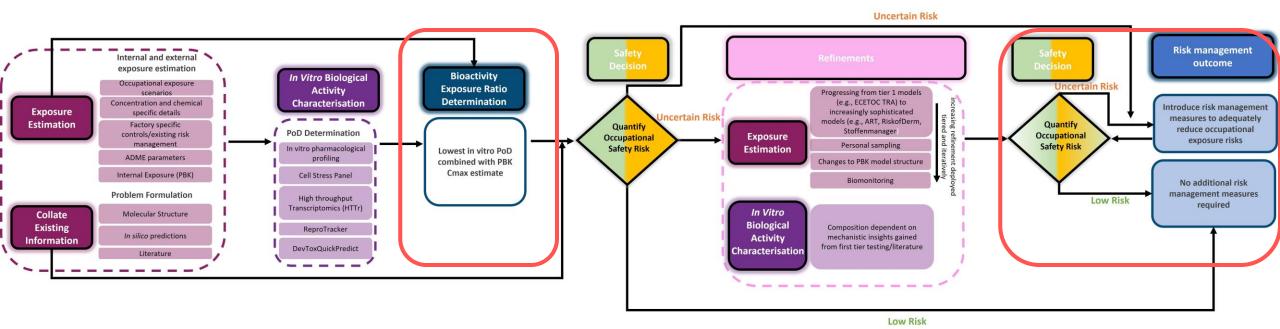


Nicol et al (2024).

Platform	CSP (Global PoD)	IPP	HTTr (MCF-7) (BIFROST)	HTTr (HepG2) (BIFROST)	HTTr (HepaRG) (BIFROST)	HTTr (MCF-7) (BMDExpress)	HTTr (HepG2) (BMDExpress)	HTTr (HepaRG) (BMDExpress)	Stemina/ devTOX quickPre dict	Reprotracker
PoD (μM) (Nominal)	7300	>100	150	2500	1200	2860	4210	1040	>1000	>1000
Correction factor based on dose-confirmation study (%)	69.1%	Not determine	69.1% I	69.1%	69.1%	69.1%	69.1%	69.1%	None necessary	Not determined
Corrected PoD (μM)	5044	>100	104	1728	829	1976	2909	719	>1000	>1000



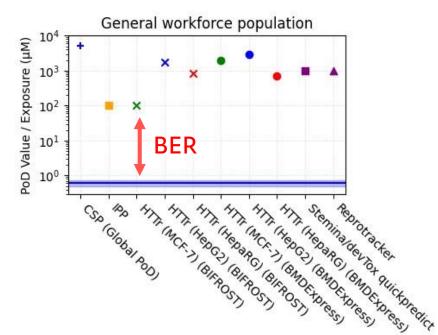
## **Bioactivity Exposure Ratio Determination and Safety Decision**

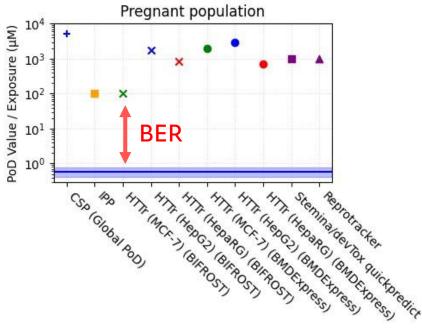




## Bioactivity Exposure Ratio Determination and Safety Decision

- Lowest PoD compared with exposure estimates.
- Most conservative BER (calculated from lowest PoD and 95<sup>th</sup> percentile pregnant population Cmax) was 130.
- In combination with existing data and lack of in silico alerts, current occupational exposures to SI are a low risk.
- Decision consistent with one that could be made using historical animal data (RCRs <1).</li>





Route	Type of effect	Risk characterisation type	DNEL	PROC 8B Exposure estimate (ECETOC TRA)	RCR (ECETOC TRA)	Worst-case BER (ECETOC TRA)
Inhalation	Systemic effects - long term	Quantitative	4.9 mg/m3	0.38 mg/m3	0.078	
Dermal	Systemic effects - long term	Quantitative	294 mg/kg bw/day	0.034 mg/kg bw/day	<0.001	130
Combined routes, systemic long term					0.078	



#### Wrap up

- Current lack of published examples of application of NGRA to worker safety.
- Framework developed here includes multiple options for refinement and is applicable to large subset of substances to which worker exposure occurs.
- Simple procedure to convert external inhalation/dermal exposures to infusion dose can be used by consultants to manage feasibility of PBK modelling and NGRA under REACH WoW.
- NGRA frameworks such as this can be implemented to address shortcomings of tonnage driven testing requirements.

#### For SI:

- Limited bioactivity across a broad range of bioactivity assays. Consistent with in silico profiling results and existing knowledge on the substance.
- Current occupational exposures (and any RMM already in place) is sufficient for protection of workers.
- Performance of additional animal testing would not provide any human health benefit.



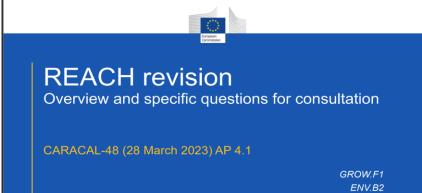
#### Looking to the future...

 EU roadmap towards phasing out animal testing is targeting all relevant pieces of legislation, including worker safety. Greater emphasis of non-animal methods (in guidance and legislation) expected as a result of roadmap actions and from REACH revision.

#### Important points:

- Lifecycle management improvements are needed by the chemical industry.
- Basic PBK modelling used here adds to extensive conservatism when estimating external worker exposure. Tiering!
- Hazard classification: Consensus required on NAMs for classification (work underway!).









#### **Acknowledgements:**

NGRA (especially this one) is a multidisciplinary exercise requiring the involvement of a multitude of individuals across a broad range of expertise areas.

- SEAC safety scientists: Richard Cubberley, Matt Dent, Jade Houghton, Predrag Kukic, Sophie
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- Mesha Williams, Kathryn Wolton
- Clariant: Catherine Breffa, Joachim Eichhorn, Fabian Grimm, MoungSook Lee
- Leuna Vantage: Caroline Chaine, Tristan Zellman,
- ERM: Willemien Wieland, Colin Smith
- Bibra: Chris Waine, Dan Threlfall
- Vitis regulatory: Peter Sladen, Mike Crookes



https://seac.unilever.com/files/c52d0ce8-0fbd-44a4-867b-fa4f7c1260d4/si-poster-for-wc12-final.pdf

 The numerous CROs where data is generated (Charles River, Toxys, Cyprotex, Bioclavis, Stemina, Eurofins, Pharmacelsus).



Contents of talk today form the basis of a paper titled "Next Generation Risk Assessment for Occupational Chemical Safety – a Real World Example with Sodium-2-hydroxyethane sulfonate" Published in Toxicology (August 2024) (https://doi.org/10.1016/j.tox.2024.153835)