Paradigm Shift in Safety Assessment Using New Approach Methods (NAMs): The EU-ToxRisk Strategy

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Abstract

The EU-ToxRisk research project is an interdisciplinary research project that aims to advance the paradigm shift in toxicology towards new approach methodology (NAM) - based approaches for risk assessment. In this European research project experts in the fields of *in vitro* and *in silico* techniques and risk assessment from academia, industry and regulatory agencies work together. Using a series of custom designed case studies the EU-ToxRisk battery of NAMs is being evaluated to learn how to carry out safety assessment using NAMs. This review article provides an overview of the project, its aims and approach and the methodologies that are being used.

Introduction

EU-ToxRisk is a 38 partner European research project that aims to advance the paradigm shift in toxicology towards mechanism-based testing (www.eu-toxrisk.eu). The core principle of the project is to utilize new approach methodologies (NAMs) such as *in silico* models and *in vitro* techniques to generate human-relevant data. EU-ToxRisk envisages to combine different kinds of NAM data for hazard characterization, which can then be applied in human risk assessment, e.g. in read-across approaches. By using *in silico* and *in vitro* techniques, we will gain insights into the mechanisms that underlie typical adverse toxicological effects and will learn how to better

predict toxic effects of chemicals. Traditional *in vivo* toxicological studies often do not provide such mechanistic information. Beyond hazard assessment, we also think that NAM data can be applied for prioritization and screening purposes.

The focus of the project is on two endpoints, repeated-dose toxicity (RDT) and developmental and reproductive toxicity (DART). In Europe, these two endpoints are common information requirements under several regulations. While the use of NAMs is encouraged in these legislations, the current standard test requirements are *in vivo* studies to determine adverse toxicological effects of chemicals (with the exception of cosmetics, for which *in vivo* testing has been banned in Europe since 2016). The dose level at which no adverse effects have been observed in the test animal is then extrapolated to a safe exposure level for humans.

Numerous, individual *in vitro* tests have been developed with the aim of predicting a certain endpoint, or to replace either an entire or a part of an *in vivo* study [1–3]. However, it is currently not possible to replace an *in vivo* study for a complex endpoint with a single or a battery of *in vitro* tests, unless specific exposure scenarios are considered where human risk can be neglected, i.e. the effects are below a threshold of toxicological concern (TTC) [4,5]. It is currently believed that we need a testing strategy that will integrate data from several NAMs to evaluate relevant aspects in hazard characterization, in particular the interplay of toxicokinetics and – dynamics. Several defined approaches (DA) are already under review by authorities for well understood endpoints like skin sensitization [6]. DA or integrated approaches to testing and assessment (IATAs) for RDT or DART are, however, not yet existing.

EU-ToxRisk has designed several case studies to explore how and to what extent NAMs can be used for hazard and risk assessment. The actual integration of NAM data into concrete case studies by EU-ToxRisk project partners helps to develop a mutual understanding on the needs for hazard assessment between academia, industry and authorities. EU-ToxRisk follows a tiered approach. First, the applicability of NAMs will be evaluated within a read-across scenario, in which anchoring *in vivo* data is available for at least one compound. In a next step this approach will be expanded to address *ab initio* assessments, where compounds without available *in vivo* toxicity data will be tested. Lessons from previous research projects have been integrated into the design of the EU-ToxRisk case studies. For example, the Seurat-1 project has demonstrated the importance of the assessment of toxicokinetics, both in the *in vitro* experimental set up and the extrapolation to safe human doses [7,8]. These two aspects were integrated into the design of EU-ToxRisk case studies through the use of ADME models and generation of ADME *in vitro*

data. As of 2018, the results of the first set of NAM-supported read-across case studies are being compiled and evaluated.

Use of NAMs in EU-ToxRisk case studies: in silico modelling and in vitro test systems

EU-ToxRisk unites both *in silico* and *in vitro* expertise from different project partners. This is essential for this project since the success of "mechanistic" hazard assessment depends on integrating complementary NAMs in a testing strategy. Linking this data to established knowledge of pathways of toxicity using adverse outcome pathways (AOPs) helps to tie together the information and make sense of the data that was generated.

How are in silico models used in EU-ToxRisk?

The *in silico* methodologies that are employed in EU-ToxRisk fall into several broad categories: i) tools to assess structural/chemical/biological similarity; ii) tools to predict compound behaviour or activity *in vivo* and *in vitro*; iii) models to predict kinetic behavior of test compounds; and, iv) tools to provide an overall uncertainty assessment. In the case studies, these tools are employed to aid formulation of a read-across hypothesis; the selection of analogues in a read-across context; aid test system selection; and the prediction of metabolism or metabolites. Kinetic modeling is employed to determine human relevant test concentrations, and later on the human equivalent oral dose based on the *in vitro* outcome. Furthermore, kinetic modelling is applied to predict the intracellular concentration of test compounds in different *in vitro* systems, a prerequisite for the extrapolation back to a safe human dose.

A brief overview of the *in silico* methods used in the project is provided below:

<u>Similarity methods</u>: Most of the methods aiming to infer toxicological properties of new compounds are based on the concept of bio-isosterism, which infers that structurally similar compounds are likely to have similar biological properties. We have applied structural similarity metrics based on well-known structural fingerprints (e.g. ECFP, [9] and the Tanimoto index [10]). However, not all structural features of compounds contribute similarly to the toxicological effects of concern and their relative importance is unknown *a priori*. This uncertainty might lead to so-called "activity cliffs" [11], compounds with a similar structure showing different biological/toxicological properties. Two approaches are applied to mitigate this problem; enrichment of molecular descriptors with experimental data and the use of supervised metrics obtained by classifiers [12]. These approaches result in enhanced similarity indexes and a better assessment of biological similarity.

Classifiers and QSAR methods: Compounds with known toxicity can be exploited to recognize the structural and physico-chemical features associated with their biological properties. This can overcome the aforementioned limitations and build robust mathematical models (classifiers or QSARs) describing this relationship. These models can be used to make predictions about the properties of new compounds. In EU-ToxRisk we have developed more than 50 models covering many diverse endpoints and biological properties. These models use state-of-the-art machine learning algorithms (conformal and non-conformal random-forest and partial least square, K nearest neighbor, support vector machines, gradient boosted tree, deep neural nets, etc.) and a wide variety of molecular descriptors (2D and 3D fingerprints, physicochemical descriptors, pharmacophoric descriptors, bioactivity spectra, etc.). A key component is the estimation of uncertainties, due to limitations of the model or the positioning of the query compound within the model applicability domain. We are applying methods like conformal regression [13] to obtain highly accurate uncertainty estimations.

<u>Biokinetic and metabolic predictions:</u> In silico methods can be applied to predict the likely metabolism of query compounds [14], [15]. To put the findings from *in vitro* assays into context, and allow hazard assessments to be conducted, two factors need to be considered. Firstly, what is the (unbound) intracellular concentration of target compound within the cells of the *in vitro* test system? Secondly what is the (unbound) concentration in the target organs of toxicity *in vivo*? A biokinetic model has been developed (Fisher et al submitted) that can take physicochemical and/or *in vitro* measured data as inputs and simulate the intracellular concentrations in the *in vitro* system with either steady state or dynamic situations considered. Although other biokinetic models have been published [16,17] the EU-ToxRisk project accounts for some additional critical components that can influence the disposition of compounds into the cells of the *in vitro* system.

The compound concentration in the target organ following an *in vivo* exposure is being assessed using physiologically based pharmacokinetic (PBPK) models [18]. Using this approach the concentration in target organs at doses that exert toxicity can be estimated and compared with the intracellular concentrations causing toxicity in *in vitro* assays, thus determining the human equivalent *in vivo* doses.

<u>Combination of Evidence</u>: Every piece of evidence obtained in the context of a hazard assessment is associated with uncertainties. Classically the overall assessment was generated *in cerebro*, by experts who apply their experience and judgements to combine all these elements. We aim to facilitate the work of experts by applying decision theories like Dempster-Shafer [19] to combine what is known about the uncertainty of the results and provide integrated, objective, probabilistic assessments.

How are in vitro models used in EU-ToxRisk?

The *in vitro* test systems in EU-ToxRisk were chosen to cover the most frequent and sensitive RDT endpoints (liver, kidneys, neuronal system, lung toxicity [20] as well as the DART endpoint [21]. They cover three levels of complexity: 1) high throughput testing; 2) organ specific models and 3) complex or disease specific models, see Fig 1 as an example for the liver. For RDT all test systems use human cells since it is thought that these will generate human relevant data. For the DART endpoint the situation is different. While human stem cell-derived test systems were chosen to give information relevant to neural crest formation, neurite outgrowth and development of embryonic stem cells; more complex test systems such as zebrafish embryos and mouse embryonic stem cells were also selected to assess the complex endpoint of DART. For DART no disease specific NAM models are available.

The test methods in EU-ToxRisk are well established and documented in DB-ALM (https://ecvam-dbalm.jrc.ec.europa.eu/). The generation of new tests addresses key events of AOPs, related to EU-ToxRisk case studies, with a focus on human iPSC derived organ specific reporter cell lines. While test systems are mostly well established they have not all undergone a formal validation procedure. Therefore, the project has internally tested the applicability and sensitivity of the tests by testing 19 well described toxicants in all EU-ToxRisk assays. In addition, transcriptomics and biokinetic data from all test systems that have been exposed to the 19 toxicants will be generated. All data has been generated in a broad concentration range, allowing identification of point-of-departure for various measurements. This data provides insights into the applicability, behavior and predictivity of the different test systems used in EU-ToxRisk. Another step towards better understanding the *in vitro* tests was to use RNA sequencing of all test systems without any chemical stressors. This data is expected to give insights into the makeup of the test systems e.g. phase I and II drug metabolism enzymes, transporters etc. This work may support the selection of optimal test systems in the future.

A sub-set of tests in EU-ToxRisk provides direct mechanistic data for the toxicological effects or endpoints of interest. For example, high throughput tests such as CALUX (Luciferase reporter assay) and HepG2-BAC-GFP (imaging-based GFP reporter assay) provide information on molecular signaling events such as agonism or antagonism of hormone receptor signaling events and activation of cellular stress response pathways in addition to providing information on cytotoxicity. Organ specific models can provide information on specific endpoints such as neurite outgrowth as well as cell viability in human relevant, target organ relevant test systems. Finally, complex and disease specific models allow the assessment of the effects of chemicals in e.g. diseased 3D liver spheroids (overaccumulation of lipids) as well as the effect of chemicals on developmental processes as reflected in the differentiation of mouse embryonic stem cells (the embryonic stem cell test) or complex systems like the zebrafish embryo test (ZET). The applicability of tests and models has been supported by a series of exploratory studies within EU-ToxRisk, and together with other partners [22–26].

Novel advances in EU-ToxRisk in vitro test systems toolbox

To improve the predictive scope of NAMs, EU-ToxRisk is working on establishing fluorescent protein reporter cell lines in iPSC. These cell lines are highly desirable since they would offer the advantage of a genetically stable cell line that can proliferate indefinitely and be differentiated into numerous target organ specific cell lineages. To date all reporter cell lines in EU-ToxRisk have been established in immortalized or cancer cell lines that are genetically unstable [27,28]. Primary human cells on the other hand have limited proliferative potential making it virtually impossible to generate reporter lines from them. These problems could be overcome with stem cell-based reporter technology. Here, the CRISPR/Cas9 technology is used to generate iPSC based fluorescent reporter cell lines. At this point, EU-ToxRisk has generated a functional iPSC HMOX1 GFP reporter for monitoring oxidative stress responses and the functionality of this reporter is evaluated in different cell lineages. In combination with live-cell imaging this will allow a temporal and quantitative assessment at the single cell level of modulation of stress response pathway activation in different target tissues.

Also, we have established dual reporter cell lines in HepG2 using BAC reporter technology. By using live cell imaging, these dual fluorescent reporters do allow the simultaneous monitoring of two different cellular stress response pathways in individual cells, or the monitoring of two different components within one pathway. This allows us to directly observe the interplay between different stress pathways, and the sequential activation of proteins within one stress pathway, respectively. Another dimension of new approaches developed and applied in the project is the application of microphysiological systems (MPS). This comprises the use of (i) 3D organoids, and the (ii) coculture of relevant cell types, such as neuronal and glial cells [29]. Moreover, it is directed to a multi-organ on a chip technology (e.g. developed by the partner TissUse) [30,31] which involves four different organs on one chip that are integrated with microfluidics. The four organ-on-achip allows prolonged exposure scenarios and will be evaluated in future case studies. This important MPS system development as a future NAM toolbox component will be subject of a high level workshop co-organised by EU-ToxRisk in June 2019.

Read-across approach

The first set of case studies in EU-ToxRisk use a read-across approach. The concept, its building blocks and assessment steps will be published in full detail elsewhere. Briefly, groups of structurally similar compounds were selected, for which existing *in vivo* animal data (e.g. from ToxRef DB or RepDose) indicated critical shared toxicological effects. In some cases, closely related compounds without *in vivo* data were added, to test in how far the "mechanistic" data from NAMs can be used to draw a conclusion on their hazard compared to other group members. Whenever possible, we included structurally closely related compounds, which did not show the critical toxicological effect *in vivo*. The absence of the effects might either be a consequence of differences in toxicodynamics and/or in toxicokinetics. With the help of NAMs, we will learn how to discriminate active and inactive analogues and predict the hazard of those being active correctly.

The reference *in vivo* data is used to guide the choice of *in vitro* test systems while PBPK modelling is used to determine relevant *in vitro* testing concentrations to provide information on *in vitro* kinetics. *In vitro* test systems provide data on endpoint and target organ specific effects, as well as insights into activation of cellular receptors, stress response pathway activation and transcriptomic changes. Finally, databasing expertise provides a platform to assemble, analyse and integrate data that is generated in the project. The EU-ToxRisk *in vitro* test systems are used to provide mechanistic data to demonstrate the similarity (or dissimilarity) of the dynamic and kinetic behavior of test substances. This testing is based on a read-across hypothesis mainly derived from the available *in vivo* and to some extent *in vitro* data of the source compounds.

One RDT read-across case study in EU-ToxRisk, for example, uses valproic acid (VPA) as a source compound. It is well established that exposure to VPA can lead to the formation of microvesicular liver steatosis in humans and in animals. AOPs for this effect have been described. In vitro tests were chosen that allow testing of key events and of a number of MIEs to demonstrate similar dynamics within the grouped valproic acid analogues. Kinetic modelling and testing are used to further ensure that absence of effects is not caused by differences in bioavailability. Similar strategies are used in other case studies, e.g. for compounds like rotenone that targets complex I of the mitochondrial respiratory chain. This effect of rotenone is related to an AOP that has recently been accepted by the OECD, and describes the key events related to Parkinson's-like neuronal effects caused by inhibition of complex I of the mitochondrial respiratory chain [32]. In vitro test systems were chosen that allow for quantitative assessment of almost all key events of this AOP. Within all the case studies, the integration of AOP-related test and toxicokinetic data are used to support and strengthen the read-across hypothesis. The final read-across assessment supported by NAMs has been documented in well-structured dossiers, termed mock submissions, largely based on OECD templates for case study reporting. These mock submissions will be presented to various European regulators who are members of the EU-ToxRisk regulatory advisory board for feedback. These case studies will be part of a workshop on read across approaches that EU-ToxRisk organizes in May 2019. The experience gained from this first set of read-across case studies carried out using NAMs and the outcome of the workshop will be used to establish a manuscript detailing read-across guiding principles.

Conclusions and future steps

The mechanistic knowledge generated in this first set of read across case studies is linked to well-described AOPs, therefore providing a strong scientific support for read-across, see Fig. 2. We believe that this thorough scientific underpinning will be key for the regulatory acceptance of integrative testing approaches developed in EU-ToxRisk. In addition, this first set of case studies has helped to shape the next set of case studies which will address new regulatory and scientific questions. Some case studies will address the issue of low or no toxicity. In these case studies we will address chemicals with little or no observed adverse effects – will it be possible to predict this using NAMs? In addition, we will address the topic of multi-target organ toxicity. Here we aim to determine whether an integrated testing strategy can define the liability of chemicals to cause toxicity in multiple different target organs and learn in how far the EU-ToxRisk

battery of NAMs will be able to correctly predict these toxicities based on qualitative and quantitative mechanistic information whenever possible related AOPs.

In the next phase of the project we will also aim to further advance the field of NAM based hazard assessment. The assessment of a chemical without any knowledge of its *in vivo* effects (*ab initio*), i.e. in the absence of any structural similars with *in vivo* data, using only NAM approaches is an ultimate, very high reaching goal of EU-ToxRisk. In order to learn how this may be achieved in the future dedicated *ab initio* case studies will be carried out in EU-ToxRisk. We will work closely with the JRC on the *ab initio* case study. Finally, we will further seek interactions with stakeholders from different chemical industry sectors to evaluate the application of the NAMs established and/or evaluated within the EU-ToxRisk project in industry-driven case studies. We anticipate that the refinement of existing NAMs, the development of novel NAMs, and the application of NAMs in case studies, will pave the way for an evolution towards well-established integrated testing strategies for the assessment of chemical safety without the use of animals.

Figure 1:



Figure 1: This diagram presents an overview of EU-ToxRisk test systems that are used to assess liver effects for the RDT endpoint. This diagram shows the three levels of complexity from high throughput testing to organ specific models and finally complex or disease specific models.

Figure 2.



Figure 2: This diagram presents an overview of the general approach taken to the first set of EU-ToxRisk case studies. Data, linked to adverse outcome pathways, was generated using *in silico* and *in vitro* methodologies from the EU-ToxRisk toolbox. The data that was generated in a case study is then combined, using uncertainty analysis and expert judgement to be used in a hazard assessment.

Acknowledgements:

This project has received funding from the European Union's **Horizon 2020** research and innovation programme under grant agreement No 681002.

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