

# Regulatory (Eco)Toxicology

## - From the other side of the pond

Marlene Ågerstrand, Post doc  
Department of Applied Environmental Science (ITM)  
Stockholm University, Sweden



# Experts disagree...

## Trichloroethene cancer risk assessments 1973 - 1996

| Not carcinogenic   | Animal but not a human carcinogen | Human carcinogen       |
|--------------------|-----------------------------------|------------------------|
| <b>NIOSH</b> (-73) | <b>IARC</b> (-76)                 | <b>NIOSH</b> (-78)     |
| <b>HSE</b> (-82)   | <b>IARC</b> (-79)                 | <b>Nord. EG</b> (-79)  |
| <b>VROM</b> (-84)  | <b>AMI/CG</b> (-81)               | <b>US. EPA</b> (-85)   |
| <b>ACGIH</b> (-89) | <b>WHO</b> (-85)                  | <b>IMM/SNV</b> (-86)   |
| <b>ACGIH</b> (-92) | <b>IARC</b> (-87)                 | <b>US. EPA</b> (-88)   |
| <b>ACGIH</b> (-96) | <b>CEC</b> (-90)                  | <b>ATSDR/EPA</b> (-89) |
|                    | <b>AMI</b> (-91)                  | <b>Can. EPA</b> (-93)  |
|                    | <b>GDCh</b> (-94)                 | <b>OECD/EU</b> (-96)   |
|                    | <b>ECETOC</b> (-94)               | <b>ATSDR</b> (-97)     |
|                    | <b>HSIA</b> (-96)                 | <b>IMM/SNV</b> (-90)   |
|                    |                                   | <b>IARC</b> (-95)      |
|                    |                                   | <b>DFG</b> (-96)       |
|                    |                                   | <b>MAK</b> (-96)       |



# Experts disagree...

## Health risk assessments of Bisphenol A

- AIST 2005
- EFSA 2006
- EFSA 2008
- ECB 2008
- US FDA 2008
- EFSA 2010
- SCF 2002
- ECB 2003
- EFSA 2014
- Health Canada 2008
- NTP-CERHR 2008
- US FDA 2010
- WHO 2011
- Chapel Hill 2007
- ANSES 2013

NO RISK

RISK

# Risk Assessments in Europe

| Chemicals legislation                                | Responsible for RA | Evaluation of RA         |
|--|--------------------|--------------------------|
| Industrial Chemicals - REACH                         | Industry           | Minimum 5% by regulators |
| Biocidal Products Regulation                         | Industry           | 100% by regulators       |
| Plant Protection Product Regulation                  | Industry           | 100% by regulators       |
| Environmental Risk Assessments of Medicinal Products | Industry           | 100% by regulators       |
| Cosmetics Directive                                  | Industry           | 100% by regulators       |

Risk assessments on substances of concern are also performed by different authorities



|  | <b>Klimisch et al. 1997</b> | <b>Durda and Preziosi 2000</b> | <b>Hobbs et al. 2005</b> | <b>Schneider et al. 2009 (ToxRTool)</b> |
|--|-----------------------------|--------------------------------|--------------------------|---|
| <b>Data type</b>                       | Tox + Ecotox                | Ecotox                         | Ecotox                   | Tox                                     |
| <b>Reliability criteria</b>            | 12-14                       | 40                             | 20                       | 21                                      |
| <b>No. of matched OECD criteria</b>    | 14/37                       | 22/37                          | 15/37                    | 14/37                                   |
| <b>Relevance criteria</b>              | 0                           | 0                              | 0                        | 0                                       |
| <b>Additional guidance</b>             | No                          | Yes                            | No                       | Yes                                     |
| <b>How to summarize the evaluation</b> | Qualitative                 | Qualitative                    | Quantitative             | Quantitative                            |



|                            | Klimisch et al. | Durda and Preziosi | Hobbs et al. | Schneider et al. |
|----------------------------|-----------------|--------------------|--------------|------------------|
| Andreozzi et al. 2004      | -               | -                  | -            | -                |
| Ferrari et al. 2004        | -               | -                  | -            | -                |
| Huggett et al. 2002        | -               | -                  | +            | -                |
| Robinson et al. 2005       | +               | -                  | +            | -                |
| Schmitt-Jansen et al. 2007 | +               | -                  | +            | -                |
| Quinn et al. 2008          | -               | -                  | +            | -                |
| Metcalf et al. 2001        | -               | -                  | +            | +                |
| Nentwig, 2007              | +               | -                  | +            | ++               |
| Halm et al. 2002           | +               | -                  | +            | ++               |

- Unacceptable reliability
- + Acceptable reliability
- ++ High reliability



# We need!

- Guidance documents that emphasize use of all relevant data
- New evaluation method
  - Systematic, transparent, consistent, and sufficiently detailed
  - Works in all type of regulatory frameworks
  - Works for a diverse group of risk assessors
  - Applicable to the current legislation
- Reporting recommendations for peer-reviewed studies

Reliability and Relevance



# What did we do?

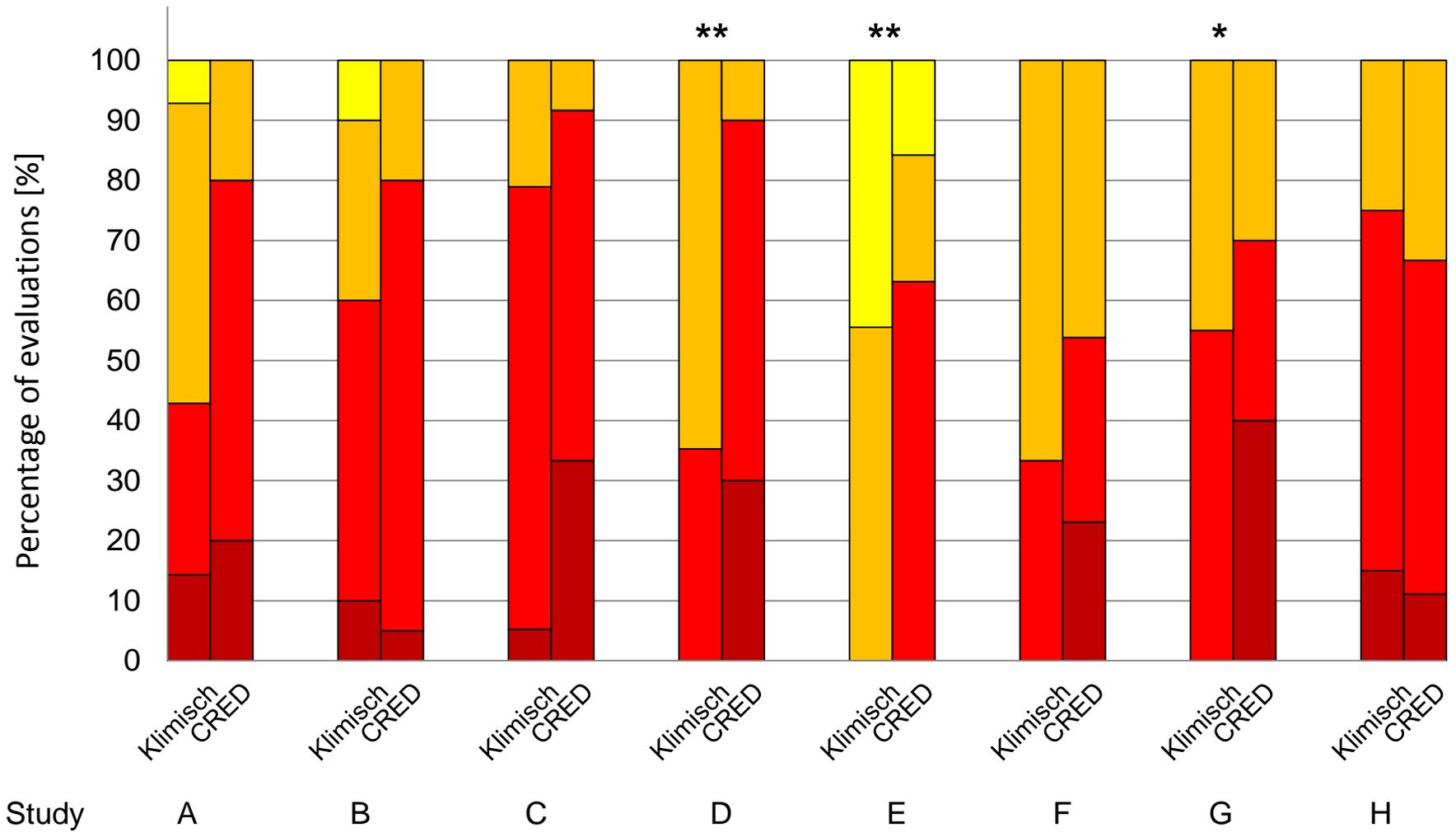
1. Developed the CRED-evaluation method for **ecotoxicity** studies
2. 75 risk assessors evaluated ecotoxicity studies using
  - Klimisch et al. (1997)
  - CRED-evaluation method
3. Comparison of results and refinement of the CRED-evaluation method
4. Developed the CRED-reporting recommendations for authors of peer-reviewed studies



---

|  | <b>Klimisch et al. 1997</b> | <b>CRED-method</b>            |
|--|-----------------------------|-------------------------------|
| <b>Data type</b>                                 | Tox + Ecotox                | Aquatic ecotox                |
| <b>Number of reliability criteria</b>            | 12-14 (Ecotox)              | Reporting 59<br>Evaluating 20 |
| <b>Number of matched OECD reporting criteria</b> | 14/37                       | All                           |
| <b>Number of relevance criteria</b>              | 0                           | 13                            |
| <b>Additional guidance</b>                       | No                          | YES!                          |
| <b>How to summarize the evaluation</b>           | Qualitative                 | Qualitative                   |

---

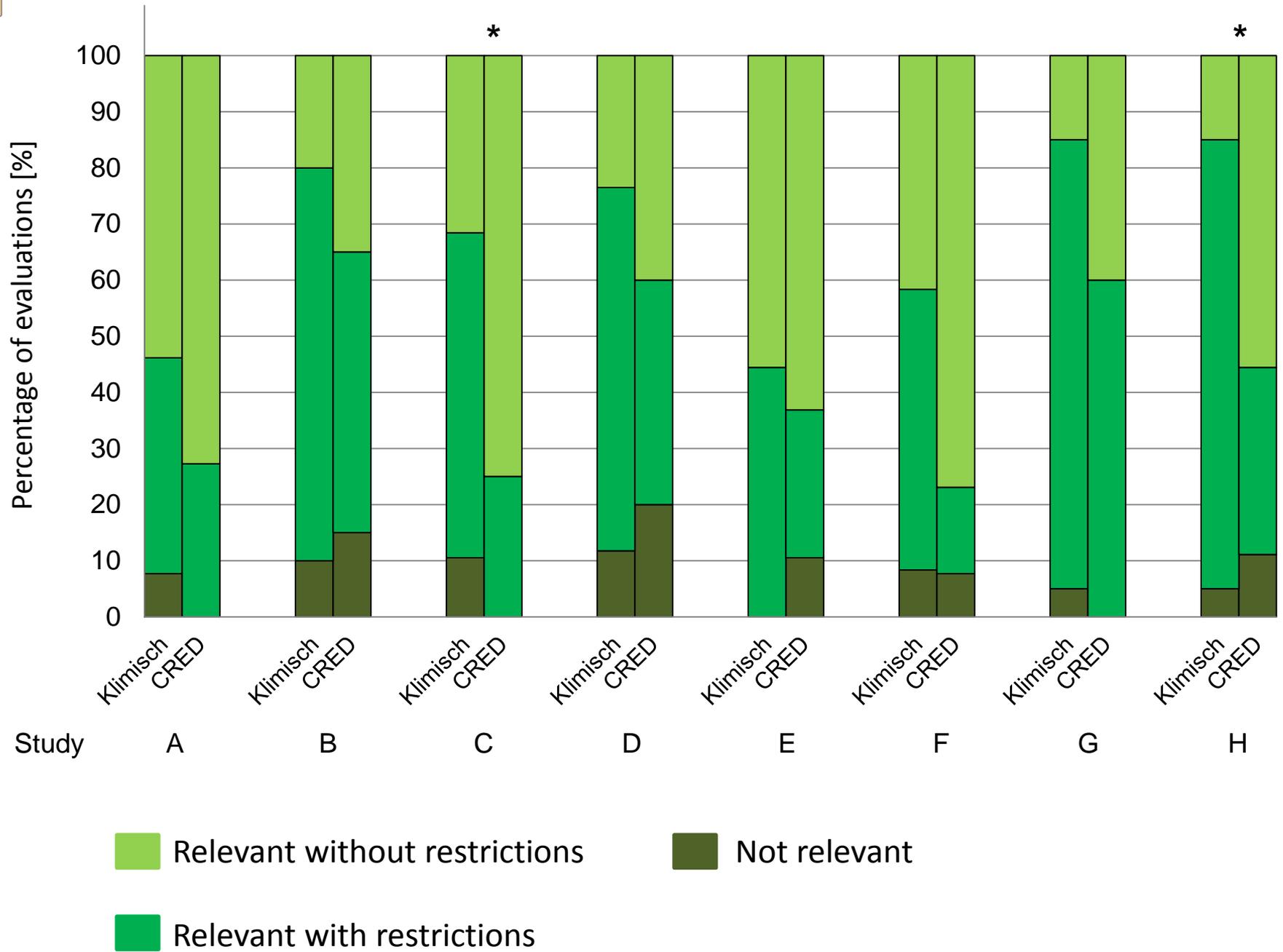


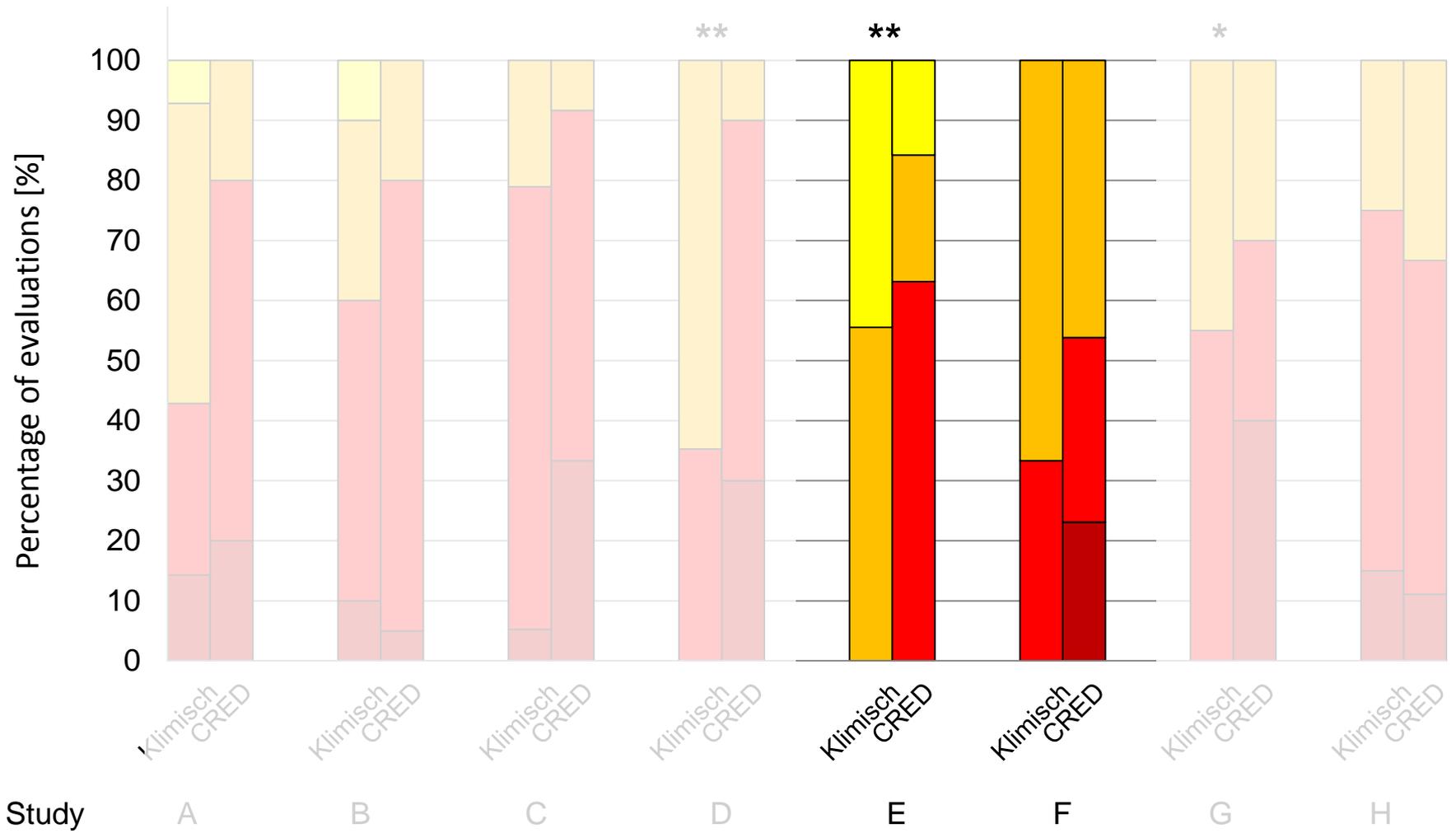
Reliable without restrictions

Not reliable

Reliable with restrictions

Not Assignable





 Reliable without restrictions

 Not reliable

 Reliable with restrictions

 Not Assignable

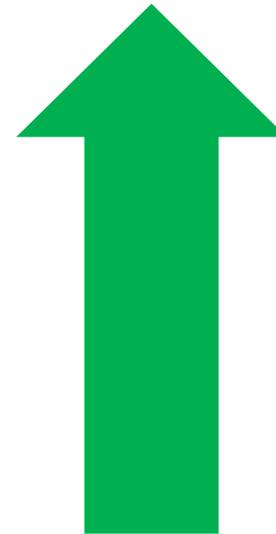


# Other effects when CRED is used?

- More consistent results
- More transparent evaluations

## Risk assessors opinions Klimisch → CRED

- Accuracy of reliability evaluation
- Accuracy of relevance evaluation
- Easy and applicable for routine use
- Consistency
- Dependence on expert judgment
- Transparency
- Useful additional guidance for CRED

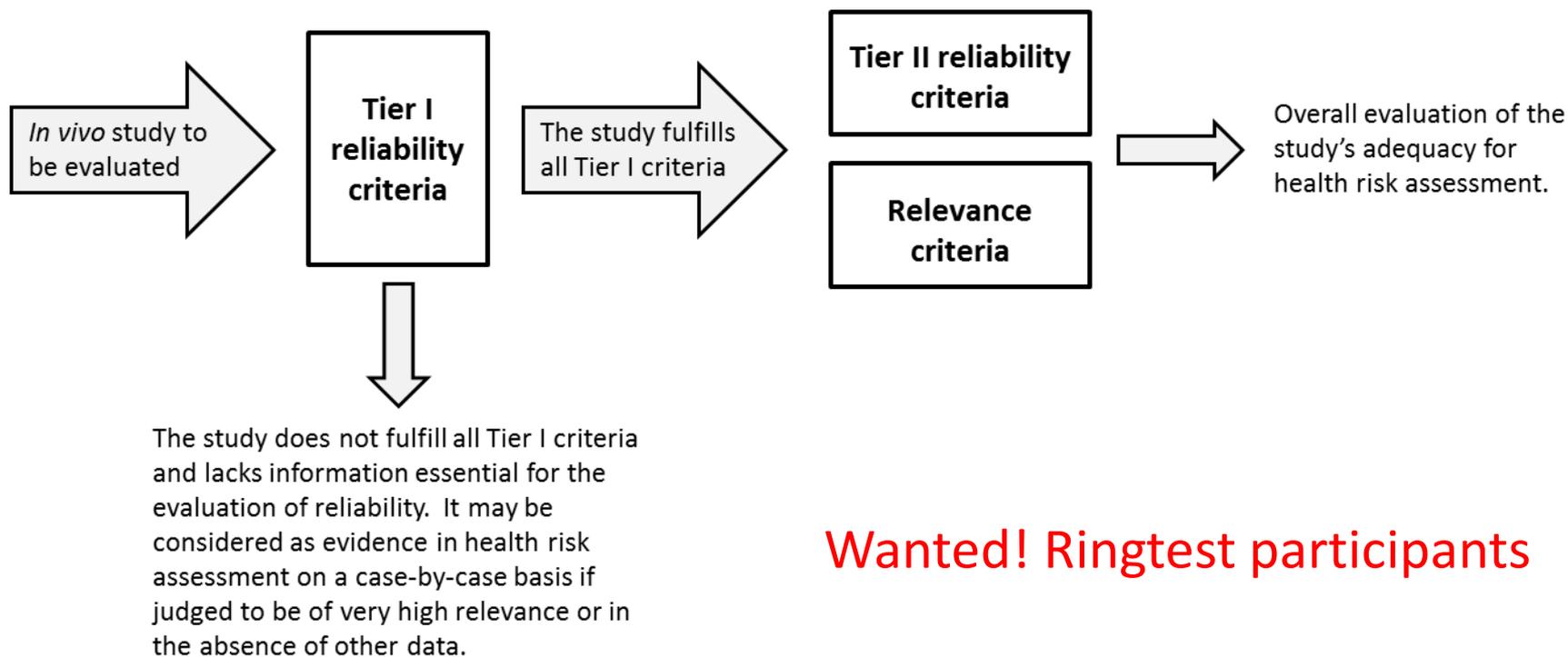




# Take home message

- The CRED method: Useful and appreciated tool
- Should be used in combination with expert judgment
- Quality never goes out of style
- Looks can be deceiving

# New evaluation method for Toxicity studies



# SciRAP: Web-based color-coding tool

| Not determined      | 1  |
|---------------------|----|
| Fulfilled           | 18 |
| Partially fulfilled | 5  |
| Not fulfilled       | 7  |
| Not applicable      | 2  |

| Purpose  |           |
|--|-----------|
| The purpose of the study has been stated.          | Fulfilled |
| The endpoints to be investigated have been stated. | Fulfilled |

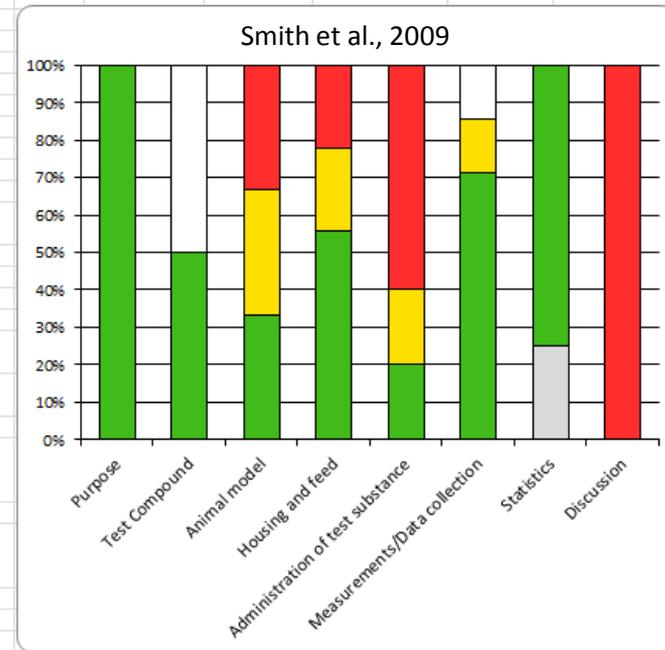
| Test Compound  |                |
|--|----------------|
| The vehicle is described.                              | Fulfilled      |
| Any fluorescent- or radiolabelling, etc. is described. | Not applicable |

| Animal model  |                     |
|---|---------------------|
| The motivation behind the choice of animal model (species and strain) is given, i.e. why one species or strain is preferred above | Not fulfilled       |
| Animals have been individually identified.  | Fulfilled           |
| The method for individual identification of animals is stated.  | Partially fulfilled |

| Housing and feed  |                     |
|---|---------------------|
| Housing conditions are described, i.e. temperature, relative humidity, light-dark cycle and number of animals per sex in each cage.   | Fulfilled           |
| Cage materials, including any physical enrichment, and water bottle materials are described.  | Fulfilled           |
| The bedding material used is described.   | Not fulfilled       |
| Considerations have been made to minimize the content of substances in the selected bedding material that may affect the toxicity of the compound being investigated, such as | Partially fulfilled |
| The type and source of feed are reported.   | Fulfilled           |
| The feed has been analyzed for contaminants that could impact study objectives, such as pesticide residues, persistent organic pollutants, heavy metals and mycotoxins.       | Partially fulfilled |
| The feed has been analyzed for phytoestrogen content.   | Fulfilled           |
| The source of drinking water is reported.   | Fulfilled           |
| The drinking water has been analyzed for contaminants that could  | Not fulfilled       |





# Future work

- Evaluation method for nanoecotoxicity studies
- “Weight of evidence” method for EDCs

*“From daily life everybody is familiar with the essence of Weight of Evidence reasoning and its basic mechanism may be regarded as a matter of common sense.”*

REACH guidance (2011)



# Future work

- Evaluation of dossiers for industrial chemicals within the REACH legislation
  - Best chemicals legislation in the world?
  - “No data, No market”: 70% are non-compliant
  - 70% of companies claimed to be smaller to get reduced fee
  - 73-95 % of REACH risk limits were numerically higher than Dutch environmental quality standards
  - “going beyond the legal requirement of checking 5% of the dossiers is not in the interest of the registrants”



# SETAC Pellston workshop Sep 2015

Chair: Marlene Ågerstrand and Jane Staveley. **Wanted! Participants**

1. *Ecotoxicity science quality: Improve quality and reporting of science*
2. *Reliability criteria for evaluation of ecotoxicity studies: Improve evaluation*
3. *Relevance of research to inform regulatory decisions: Increase acceptance of non-GLP studies*
4. *Weight of evidence: Identify available methods and problems in this process*
5. *Regulatory impact: Identify successful examples and strategies*

A pair of hands, one slightly larger than the other, are shown from the front, cupping a small, realistic-looking globe of the Earth. The globe shows continents in light green and yellow and oceans in blue. The background is a soft, out-of-focus grey.

[www.scirap.org](http://www.scirap.org)

Thank you!  
Questions?

Please contact me for copy of publications  
and presentation

[marlene.agerstrand@itm.su.se](mailto:marlene.agerstrand@itm.su.se)



The Swedish Foundation for  
Strategic Environmental Research