

# Rapporteurs initial response

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**IDEA Workshop on the replacement of animal testing in QRA for skin sensitisation**

**Brussels, May 16-17, 2018**

# AREAS OF GENERAL AGREEMENT

- Tests favoured and demonstration of dose response
- Assumptions made in developing the various assessment schemes are very similar
- General agreement on the sources of data that need to be used but differences in the order in which they are applied and their relative importance
- Weight of evidence cited in each case as the tool for bringing the data together, but the details of how the weight of evidence is actually conducted were lacking

# GENERAL ASSUMPTIONS

- There is a single AOP for fragrance initiated sensitisation in humans that provides a sound basis for in vitro test design for characterising sensitisers
- The critical steps for the AOP are the initial ones (KE1-KE4)
- KE1 → KE2 → KE3 → KE4 considered as a linear pathway
- LLNA and HRIPT test data are sufficiently robust data bases to be used for bench mark fragrances for in vitro test suitability
- Potency assessment for these early stages is a valuable indication of human sensitisation potency.

# Weight of evidence approaches used

- **Formalised predetermined protocols.**

Concern: discourages innovation and may exclude important other data

- **Built in to a specific data evaluation tool** eg Bayesian, neural networks

Concern: weight of evidence application not transparent

- \* **Case by case.**

Concern: Transparency and time commitment

# Dealing with uncertainty

- What is an acceptable level of predictability and how is it decided?
- Can potentially problematic fragrances be identified early on based on structural and read across data?
- What procedures do we need to characterise uncertainty in the overall assessment? (how to take into account already built in conservatism?)
- How to address those uncertainties deemed of concern?
- Should there be guidelines on how to identify and address uncertainty?

# Impact of other ingredients

The impact of other ingredients was not really addressed here.

- Is the assumption that this is not generally an issue in terms of in vitro testing?
- Should it be considered as an additional aspect of the overall assessment?

# Way ahead??

- What can we learn from previous work on non animal testing for risk assessment purposes e.g. Genotoxicity testing?
- Should we formulate priorities for further development of the non animal based QRA framework and how a suitable levels of coordination can be achieved?
- Is our approach specific to fragrances or should we make more effort to collaborate with other industrial groups who also are developing non animal testing strategies?
- How do we proceed organisationally with any/all of the above