

**ENVIRONMENT DIRECTORATE  
CHEMICALS COMMITTEE**

**Working Party on Manufactured Nanomaterials**

**MULTIPLE MODELS APPROACH CAN ADVANCE RISK ANALYSIS OF NANOSCALE  
MATERIALS**

**DRAFT PROJECT REPORT**

**15th Meeting of the Working Party on Manufactured Nanomaterials  
4-6 November 2015  
OECD Conference center, Paris, France**

*This document is only available in PDF format.*

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**JT03385178**

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This document is the draft report on the "state of the science for alternative testing strategies in risk analysis". This project is part of the WPMN work on Risk Assessment and Regulatory Programmes.

The draft will be discussed by the Steering Group on the Risk Assessment and Regulatory Programmes (SG-AP), when it meets on the 3rd November. SGAP will present this document to the WPMN15 with a recommendation on the next steps.

The final documents will include several annexes that are still under review.

***ACTION REQUIRED: The Working Party is invited to take note of this document and agreed to the next steps as suggested by SGAP.***

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## ABSTRACT

The Organisation for Economic Co-operation and Development (OECD) Working Party on Manufactured Nanomaterials (WPMN) SG-AP Project (#4), “Advancing the practice of risk assessment with alternative testing strategies: State of the science for read across and risk assessment guidance” coordinated several efforts culminating with a workshop in 2014 to develop recommendations on how to advance the use of alternative testing strategies for nanomaterials in risk assessments. The project team surveyed the state of the science in alternative test strategies (ATS) from a “multiple models” perspective to show areas of common findings from differing approaches, areas of greatest uncertainty, and priorities for follow up in applied research toward risk management of manufactured nanomaterials (MNs). Experts from academia, industry, public interest groups, and government researched, analyzed, and discussed how alternative models could be used to advance the risk analysis of MNs. The objectives were to identify how ATS could be used in a risk analysis context to inform human health, ecosystem health, and exposure needs for MN in the near term and longer term, and research needs to support the development of these strategies in the near future. Efforts included organizing and producing a symposium, a case study on alternative methods in safety testing, a State of the Science report and three white papers, each used as background materials for discussion in a September 2014 workshop that developed recommendations to advance knowledge and fill key gaps in understanding. Workshop deliberations revealed that ATS are now being used for screening, and that, in the near term, ATS could be developed for use in read-across or categorization decision making within certain regulatory frameworks. Participants recognized that leadership is required from within the scientific community to address basic challenges, such as standardization of materials, techniques and reporting, designing experiments relevant to realistic outcomes, as well as coordination and sharing of large-scale collaborations and data. The recommendations will aid the proper development and implementation of relevant ATS for MN testing that will expedite the ability to identify high-risk MNs, and lead to more rapid, cost-effective, and reliable MN safety testing for specific risk management decision contexts.

## INTRODUCTION

1. The Organisation for Economic Co-operation and Development (OECD) Working Party on Manufactured Nanomaterials (WPMN) is engaged in several ongoing efforts relevant to the use of *in vitro* and other alternatives to traditional animal toxicology studies. In recent years, several workshops and expert meetings have led to the development of reports and recommendations for the use of specific methods for testing nanomaterials. Recent efforts include WPMN and the European Scientific Committee on Consumer Safety (SCCS, 2012) has conducted a preliminary review of Test Guidelines for their applicability to MN (OECD, 2009). These reviews concluded that many of the basic toxicological principles in the existing OECD guidelines are applicable to MN testing, but in some aspects, nano-specific considerations must be made. For example, the OECD guidance documents developed for chemicals do not include adequate information on physico-chemical (p-chem) characterization, measurement, delivery, tracking, and dosimetry and, because of this, developed a document specifically addressing MN on sample preparation and dosimetry (OECD, 2012). This pilot project seeks to build on these efforts by considering needs and requirements for testing in a risk assessment context. Specifically, the pilot focuses on the current state of knowledge and research needs to advance the use of alternative testing strategies (ATS), as opposed to individual methods.

2. ATS have the potential to expedite the evaluation of new and existing substances by reducing the time and resources required to generate data compared to that of conventional tests. They promise to provide rapid screening and detailed mechanistic and cellular level toxicity information. Ultimately, data from ATS methodologies are expected to improve regulatory decision-making. A diversity of approaches are proposed, and there is an immediate need to inform the development of these strategies in such a way that they produce relevant, reliable, and useable data that can be used for risk assessment and policy development. To address these needs, the OECD WPMN Pilot Project “*Advancing the practice of risk assessment with alternative testing strategies: State of the science for read across and risk assessment guidance*” surveyed the state of the science in ATS from a “multiple models” perspective to show areas of common findings from differing approaches, areas of greatest uncertainty, and priorities for follow up in applied research toward risk management of MNs. A multiple models approach considers requirements to build an adequate level of evidence with ATS to overcome uncertainties associated with reliance on a single test or battery. This project stemmed from an ongoing collaboration between the Society of Risk Analysis (SRA) and the OECD (Figure 1), led by Lorraine Sheremeta (Alberta Ingenuity Labs, Canada), with support from Yasir Sultan (Environment Canada), Myriam Hill (Health Canada), Andy Atkinson (Health Canada), Carsten Kneuer (BfR, Germany), and coordinated by Jo Anne Shatkin (SRA Councilor, and Vireo Advisors, USA).

<b>2006</b>	SRA forms Emerging Nanoscale Materials Specialty Group
<b>2008</b>	SRA holds Public Workshop on “Nano Risk Analysis: Advancing the Science for Nanomaterials Risk Management”
<b>2009</b>	OECD WPMN/SRA/BIAC co-sponsor Workshop on Risk Analysis of Manufactured Nanomaterials
<b>2010</b>	Series of publications in Risk Analysis
<b>2010-11</b>	SRA new initiatives:
<b>2011</b>	Presidential Roundtable at Annual Meeting
<b>2012</b>	SRA issues recommendations on “Important Issues in Risk Assessment of Manufactured Nanomaterials.”
<b>2013</b>	SRA/WPMN Pilot Project on ATS in Risk Analysis
<b>2014</b>	SRA holds Public Workshop on “Nano Risk Analysis II: A Workshop to Explore How a Multiple Models Approach Can Advance Risk Analysis of Nanoscale Materials”

**Figure 1** History of OECD and SRA collaboration

3. The main objectives of this pilot project were to:
  - I. Create a database of methods and ATS being used
    - a. Identify major users, which materials have been studied, the systems tested, and how well established they are for MN and distinguish existing from emerging methods
    - b. Compare findings across different users of methods (*e.g.* zebrafish assays)?
  - II. Perform meta-analysis of physical and chemical properties and endpoints, seeking to extrapolate relationships to toxicology in the OECD WPMN dossiers.
    - a. Analyze the ability to use a suite of methods inform comparative assessment of nanoscale material property data to effects
    - b. Characterize uncertainty associated with predictive relationships and propose strategies to address uncertainties
4. Make recommendations on how to improve the OECD WPMN Sponsorship Programme database, if required, for such comparative analysis.
5. Identify steps needed for these methods to be widely adopted.
6. The overall goal was to inform the development of guidance for ATS use in approaches for risk analysis through data gathering and analysis, discussion amongst contributors, and expert recommendations.
7. These objectives were met by the activities described here with Annex numbers aligning with pilot project objectives. The pilot project commenced with an educational and interactive workshop at the SRA 2013 Annual Meeting in Baltimore, Maryland in December 2013, a half day presentation and discussion of ATS- related issues identified during a preliminary research stage, and served as the focal point for planning deliverables for the workshop. Several efforts followed, including an investigation into the State of the Science for alternative testing strategies for MN and a report on ATS in risk analysis (Annex I), development of a database as a case study with nano-TiO<sub>2</sub> on the current status of methods

(with a focus on alternative methods, or ATMs) in safety assessment (Annex II), and three white papers on the topics of human health, ecological, and exposure considerations regarding the use of ATS for MNs (Annex III) in preparation for an SRA-organized workshop held in Washington, D.C in September 2014 (Annex IV). The workshop brought together 58 experts from diverse backgrounds to discuss the incorporation of ATS into risk assessment for MNs, and to assess the potential for a multiple models approach to using ATS for risk screening and their reliability for predicting human outcomes that can increase confidence, decrease uncertainty, and inform risk-based decision making. The workshop summary reports highlight the recommendations for next steps to advance the use of ATS for risk analysis.

8. The outputs of the pilot project included:

- Five manuscripts submitted for a special issue in the journal *Risk Analysis*, including the workshop report, State of the Science Report and papers resulting from the white papers and workshop discussions of the human health, ecological health, and exposure groups.
- A piece highlighting the policy aspects of the workshop was published on a popular web site, NanoWerk in advance of the workshop (JA Shatkin and L Sheremeta, 2014. Nanomaterial safety: An international collaboration on in vitro testing strategies; <http://www.nanowerk.com/spotlight/spotid=36452.php> )
- Following the workshop, presentations were given to diverse audiences, including: the 2014 EPA/OECD Expert Workshop on Categorizing Nanomaterials for Regulatory Decision Making (September 18-19, 2014, Washington, DC); the Sustainable Nanotechnology Organization (November 24, Boston, MA); and a Symposium that included the paper authors at the Society for Risk Analysis Annual Meeting (December 5-8, Denver CO).



## STATE OF THE SCIENCE REPORT – "STATE OF THE SCIENCE FOR ALTERNATIVE TESTING STRATEGIES IN RISK ANALYSIS"

9. Research into the available methods, key research groups and state of development led to the report and Table 1 entitled "State of the Science for Alternative Testing Strategies in Risk Analysis." Table 1 summarizes some key findings of representative ATS. The full report is attached in Annex I and the poster presentation can be found in Annex V. The report reflects on the current status of alternative ATS for MNs and their application in screening level decision making, or prioritization of substances for both human and ecological health. It captures the current state of development and application of ATS for MNs, and provides in depth reviews of several strategies and their approach, including the materials and methods used. The work is briefly summarized here.

10. The focus of the state-of-the-science analysis was to highlight the current efforts in alternative testing methods (ATM) to inform ATS for use towards efficiently advancing the fields of nanotoxicology and risk assessment. Several expert deliberations have concluded that while standalone alternative methods (ATM) may contribute to basic mechanistic or toxicity knowledge, they will not be sufficient for use in quantitative risk assessment; rather, a battery of ATM will likely be used in a weight-of-evidence approach (e.g., Nel *et al.*, 2013a). Strategically incorporating multiple ATM into ATS will allow for an understanding of human and environmental behaviour and toxicity of MN across endpoints, receptors and material groups.

11. Incorporation of multiple single parameter *in vitro* tests in an ATS increases confidence in results, provides valuable information regarding potential mechanisms of effect, and identifies doses for further testing and aids in MN hazard and risk analysis. For instance, a combination of tests such as tetrazolium-based assays (e.g. MTT, MTS, XTT), trypan blue, alamar blue, lactate dehydrogenase assay, and neutral red uptake are regularly used to assess overt toxicity of MN (Nogueira *et al.*, 2014). Similarly, methods such as DCF fluorescence, lipid peroxidation, and assays measuring oxidative stress enzymes (e.g. glutathione, superoxide dismutase) are commonly employed to assess a MN's potential to induce oxidative stress (Nogueira *et al.*, 2014). Furthermore, inflammatory response to MN exposure is often assessed by enzyme-linked immunosorbent assay (ELISA) that can be multiplexed to measure cytokines and chemokines (Nogueira *et al.*, 2014), and genotoxicity studies often employ the Comet assay, the micronucleus assay, the chromosome aberrations test, and the bacterial<sup>1</sup> reverse mutation assay (Nogueira *et al.*, 2014; Magdolenova *et al.*, 2013).

12. In addition to the ability to adopt these existing chemical testing methods for MN, there is concurrent development of emerging *in vitro* tests to address specific MN toxicity endpoints, such as reactive oxygen species generation. Single parameter tests have been used to develop high throughput screening (HTS) and high content screening (HCS) approaches that allow for the large number of unique MN formulations to be screened in a relatively rapid manner. HTS involve screening materials in batches, typically at rates of hundreds or thousands of readings per day and may take advantage of automated equipment, such as robotic liquid handling and/or computerized image capture. Examples include real-time characterization of MN using dynamic light scattering (Wang *et al.*, 2013), cell-microelectronic sensing for cytotoxicity, (Moe, 2013) cell microarrays and Lab-on-a-Chip based screening of genotoxicity (Vecchio, 2014; Safe Work Australia, 2013) and zebrafish embryo studies determining effects on hatching, stress and development (Lin *et al.*, 2011). Large scale studies investigating small variations across MN have so far

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<sup>1</sup> OECD recently concluded that the bacterial mutagenicity assays may not be suitable for detecting genotoxicity induced by nanomaterials because of lacking ability for endocytosis and limited nanomaterial diffusion across the bacterial cell wall, ENV/JM/MONO(2014)34

contributed to understanding the correlations between p-chem properties and MN toxicity, and provide quantitative, mechanistic, pathway-based data (Nel *et al.*, 2013a). These examples of MN-based studies are useful for early tier hazard ranking, prioritization for advanced testing, and determination of starting concentrations for further experiments (Lin *et al.*, 2011; Kavlock *et al.*, 2012).

13. *In vitro* models are becoming increasingly sophisticated and better at mimicking human-relevant conditions. Three-dimensional (3D) cell co-cultures and (micro)fluidic models are emerging techniques used to create more realistic exposure conditions by simulating the morphology and physiology of natural tissue (Astashkina and Grainger, 2014; Roth and Singer, 2014; Rothen-Rutishauser *et al.*, 2005; Kostadinova *et al.*, 2013; Chortarea *et al.*, 2015; Horváth *et al.*, 2015). The results of these studies have shown that the 3D fluidic systems may more closely reflect *in vivo* conditions. While complex 3D systems may more closely resemble human conditions, these technologies are still in the early stages of development, and important information can also be rapidly and cost-efficiently obtained from combinations of less complex *in vitro* tests, especially when used as part of an ATS. A tiered ATS can be envisioned in terms of “increasing system complexity” where substances are first tested in the “simpler” more high-throughput *in vitro* systems (for example to assess overt toxicity) before deciding whether it is necessary to test that substance in a more complex *in vitro* system that more closely mimics the human situation.

14. *Ex vivo* studies are performed with tissues or organs removed from organisms while structure and viability are maintained in as natural condition as possible. In some cases, tissues or organs may be obtained from humans (*e.g.*, for use in OECD TG 428 *in vitro* Skin Absorption) or from animals killed in slaughterhouses (*e.g.*, for use in OECD TG 437 Bovine Corneal Opacity and Permeability and OECD TG 438 Isolated Chicken Eye Test), excluding the need for animal sacrifice specifically for the experiment. *Ex vivo* studies can provide complex and realistic conditions and greater control over experimental parameters, while obtaining more results from the same number of organisms than in *in vivo* methods.

15. *Ex vivo* models may be used to evaluate MN penetration, uptake, and distribution, as well as toxicokinetics. For example, *ex vivo* rabbit and murine lung models (Beck-Broichsitter *et al.*, 2009; Nassimi *et al.*, 2009), bovine eye models (Kompella *et al.*, 2006) rat lower intestine model (Sandri *et al.*, 2010), immune responses in human blood cells (Delogu *et al.*, 2012; Mo *et al.*, 2008), cardiovascular effects (Stampfl *et al.*, 2011), and crossing of the placenta (Sønnegaard Poulsen *et al.*, 2013), have been employed. Comparison of *ex vivo* and *in vivo* gut exposure to TiO<sub>2</sub> MN show similar modes of translocation and localization in the epithelium of both models (Brun *et al.*, 2014). Rat, mouse, or human precision cut lung slices are used to assess toxicant effects on the respiratory tract, such as cytotoxicity, genotoxicity, altered protein content, oxidative stress, apoptosis, cytokine release and histological changes (Wohlleben *et al.*, 2011; Hirn *et al.*, 2014; Kreyling *et al.*, 2014). The use of *ex vivo* methods for MN is still uncertain due to susceptibility to interferences, highly variable results, and an inability to determine appropriate dose-metrics that relate to *in vivo* exposure (Sauer *et al.*, 2014; Kim *et al.*, 2014). *Ex vivo* methods may be useful for prioritization and ranking of MN toxicity (Kim *et al.*, 2014; Wohlleben *et al.*, 2011), but further method optimization is likely needed to address reproducibility, false positives, false negatives, and to better understand the limitations of the system (Sauer *et al.*, 2014; Hirn *et al.*, 2014).

16. *In silico* methods (sometimes referred to as “non-testing methods”) are computational techniques that are crucial for the analysis of MN effects data. Traditional *in silico* methods have to be adapted, or new approaches must be developed for MN, due to the size related properties of MN different from conventional chemical substances. The ultimate goal of *in silico* method development is to have a set of standard predictive models with defined parameters that can accurately and efficiently predict human and ecological toxicity of MN with minimal biological experimentation.

17. A lack of availability of quality data that can address the issues related to categorization and grouping of MN based on their p-chem properties, mode of action or relevant exposure also hinders the development of *in silico* methods (Tantra *et al.*, 2014). Data from such approaches combined with clear reporting guidelines for MN studies can aid in increasing the predictability of *in silico* methods. These data may exist, but have not been reviewed or organized into a format to evaluate the replicability across substances.

18. It is generally accepted that no stand-alone *in vitro* or *ex vivo* test can replace a standardized *in vivo* method; however, a combination of such methods in a tiered strategy or integrated approaches to testing and assessment (IATA) will allow for prediction of realistic biological outcomes. Well-designed ATS will provide answers to focused and relevant MN toxicity questions. There are a number of different nano-specific ATS under development. Annex I [Table 1](#) summarizes several key strategies that have been proposed and identify the goals, key concepts or steps, and the benefit and limitation of the strategy.

19. IATA, also referred to as ITS (Intelligent Testing Strategies), are approaches to ATS that are used to identify and prioritize MN safety research needs (Stone *et al.*, 2014). IATA are logically designed to combine existing data, experimental tests, and analytical tools to answer hypothesis driven questions used to make hazard or risk decisions, with the goal of reducing the need to test each MN formulation in higher tier tests, esp. *in vivo* (Jaworska and Hoffmann, 2010; Stone *et al.*, 2014; Hartung *et al.*, 2013). Ideally, IATA are designed to be flexible where experiments testing for similar or correlated toxicity pathways may be exchanged within the strategy (Hartung *et al.*, 2013).

20. Generally, IATA consist of a tiered or semi-tiered framework with: 1) evaluation and organization of existing data (using tools such as Adverse Outcome Pathways [AOPs]); 2) measurement of p-chem properties; 3) evaluation of the life cycle and biokinetics of the MN; 4) selection of appropriate context-specific toxicity tests (*e.g.* p-chem properties, use, release, potential exposure scenarios); and 5) application of a weight of evidence (WoE) analysis that considers all the results from the previous steps. IATA have been developed for skin irritation and corrosion (OECD, 2014) human health risks of MN in food (Cockburn *et al.*, 2012), medical applications (Dusinska, 2013), and ecological assessments (Balls *et al.*, 2012; Oomen *et al.*, 2014).

21. AOPs are conceptual frameworks being developed for risk assessment; they describe a sequential chain of causally linked events that lead to an adverse human or ecological outcome. Existing data can be harnessed to develop an AOP, which starts from a molecular initiating event, which links to key events at different levels of biological organization (*e.g.*, cellular or organ response), eventually leading to an adverse outcome at an organism or population level (Ankley *et al.*, 2010; OECD, 2013). It has become clear that direct correlations between a single MN p-chem property and *in vivo* outcomes are not possible; AOPs instead focus on groupings based on both the chemical activity and the consequent biological processes (OECD, 2013). Development of data using a number of different alternative testing methods for each key event builds WoE and confidence in these groupings. OECD has also published guidance document on ‘Developing and assessing adverse outcome pathways’ (OECD, 2013). One major effort towards AOP development is the AOP Knowledge Base, an OECD online initiative that provides users guidance and tools to develop new AOPs, and allows user to contribute to the existing knowledgebase, and to maximize the potential of already developed AOPs for risk assessment. As part of this initiative, OECD launched the user-friendly AOP wiki, designed to capture the scientific information in a central repository.

22. For screening MN of unknown toxicity, a WoE approach in which all available qualitative and/or quantitative data are taken into account and weighted to help decide whether there is adequate information to support a decision, is important for risk assessment purposes. For example, a number of organizations have recommended measuring p-chem properties of MN using a multi-technique approach to overcome the limitations of individual methods to characterize MN in complex matrices (Methner *et al.*, 2009). A similar

approach requiring multiple different assays to test one endpoint, will improve the utility of *in vitro* assays. Evaluation of the available data and ATM with respect to relevance and reliability is, however, a prerequisite for such WoE approaches.

23. In summary, ATMs are generally adaptable for MN testing, but nano-specific factors have to be taken into account. For example, the kinetics of MNs may be different than traditional chemicals, affecting the behavior in traditional media (*e.g.* settling to the bottom of a well). The use of realistic barrier models (*e.g.* 3-D co-cultures of dermal structures) appears to be an important consideration for MNs since MNs have different uptake mechanisms, and these types of models are likely more representative and correlated to *in vivo* outcomes. Several types of ATMs are described in the report – sections on *in vitro*, *ex vivo*, *in silico*, and high throughput screening (HTS) covered a spectrum of alternative tests. Emerging *in vitro* and *ex vivo* tests are currently being thoroughly tested by a number of groups such as the National Institute of Environmental Health Sciences' (NIEHS) Nano GO (Xia *et al.*, 2013), the German Federal Ministry of Education and Research's NanoCare and Cell@Nano (NanoCare 2009), and numerous academic labs. Some tests are being validated for their applicability to MNs by a number of agencies, including the OECD, the European Union Reference Library for alternatives to animal testing (EURL-ECVAM), and the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM). Novel *in silico* methods are steadily growing, and are an important part of MN toxicity testing. At this point, *in silico* models are not well enough developed, nor are there enough reliable data on MN toxicity to validate these models. HTS and high content screening (HCS) are upcoming methods that will allow for batch screening of MNs that will allow for higher testing volumes at a faster rate and more economical cost.

24. Table 1 of the State of the Science Report (ANNEX I) included a summary of testing strategies described in detail to give workshop participants an idea of the breadth and diversity of existing strategies. IATA were further elaborated in the human health section of the workshop by Dr. Vicki Stone. Strategic nano-testing approaches such as NanoTest's multiple models approach (Dusinska *et al.*, 2013), the NanoSafety Cluster Working Group 10's integrated approach (IATA) (Oomen *et al.*, 2014), a decision tree approach (Balls *et al.*, 2012), The University of California's Centre for the Environmental Implications of Nanotechnology's (UC CEIN) efficient and comprehensive HTS platform for predictive toxicological testing (George *et al.*, 2011; George *et al.*, 2010; Zhang *et al.*, 2012; Cohen *et al.*, 2012), a dynamic energy budget approach (Holden *et al.*, 2013; Klanjscek *et al.*, 2013; Muller *et al.*, 2014), an embryonic zebrafish metric (EZ metric) method (Liu *et al.*, 2013a; Liu *et al.*, 2013b), EPA's ToxCast screening approach, and Engineered NanoParticle Risk Assessment's (ENPRA) extensive *in vitro*, *in vivo*, and *in silico* testing programme (Winkler *et al.*, 2013; Dix *et al.*, 2006; ENPRA 2014). While all these strategies differed in approach, general themes emerged for their use in MN testing, including the inclusion of extensive p-chem characterization, the use of multiple tests and models within a strategy, and the development of a tiered or semi-tiered scheme prior to the commencement of tests.

25. This report, in combination with the information presented and discussed, formed the basis of two manuscripts, the State of the Science paper and a workshop paper, "Advancing risk analysis for nanoscale materials: Report from an international workshop on the role of alternative testing strategies for advancement", submitted to the journal *Risk Analysis* earlier this year.

**ALTERNATIVE TESTING STRATEGY CASE STUDY – ATS METHODS AND NANO-TiO<sub>2</sub>**

26. Project deliverables also included a case study in the form of a database and analysis. We sought to collect information about studies using *in vitro* and other alternative testing strategies, particularly also when *in vivo* testing was included, to examine the availability and quality of information. Nanoscale titanium dioxide was selected as a case study because, 1) it is a data-rich MN relative to others, and 2) it was included in the OECD WPMN Testing Programme on Manufactured Nanomaterials, 3) it is widely used and 4) it is considered “not soluble” and does not shed ions as do other metal oxides. In general, data inclusion criteria involved: 1) findings reported in the last 5 years; 2) findings for ATS involving several methods, rather than standalone assays; and 3) use of modified protocols for the study of engineered MNs. Studies that filled pre-identified knowledge gaps, such as oral exposure data, papers with high-throughput methods, and “round robin” standardized testing programs were among exceptions to the criteria above. From these, ninety-six studies and publications of *in vivo* and *in vitro* tests were identified and added in the database, including the Working Party of Nanomaterials (WPMN) Draft Dossier for Titanium Dioxide. Initially, a review of toxicology literature employing *in vitro* and other alternative methods and/or ATS with nano-TiO<sub>2</sub> was performed to identify potentially relevant data. We prepared a spreadsheet to capture the study details in a consistent searchable format. Thirty eight (38) variables for each study were identified for inclusion to capture key details of the study parameters and methods. Extensive effort was made to identify an ontology so the data could eventually be linked to an informatics database where physical and chemical properties were already recorded.

27. The data for the case study are taken from 96 unique publications on n-TiO<sub>2</sub>, and includes 1,820 “data entries” (one row = 1 data entry), and 38 categories (columns), representing 69,160 data points in a searchable spreadsheet. One data entry is representative of a result from an exposure to one type of n-TiO<sub>2</sub> based on one type of endpoint measured by a single method (e.g. cytotoxicity by exposure to P25, as measured by the alamar blue assay) within a publication, thus one publication may warrant several data entries, particularly since larger comparative studies were prioritized. The 38 data categories, or columns, include: discrete data (numerical and textual); pre-determined or refined categories, e.g., cytotoxicity as endpoint analysis type; and purely descriptive text, e.g. exposure notes. A few examples of the data recorded are: type of TiO<sub>2</sub> material, testing method, which organism/cell was used, doses used, doses at which effects were observed, etc.

28. An analysis of the data addressed 13 questions regarding the scope and magnitude of available ATS data in the case study. The analysis revealed that 64% of the studies were with commercial materials, while 27% were made in lab. The top 5 types of endpoints studied were cytotoxicity, oxidative stress, immunology, genotoxicity, and *in vivo* viability (Figure 1). The most commonly employed *in vitro* assays to study cytotoxicity were LDH, MTT, WST-1, oxidative stress: DCF-DA, and DCFH-DA. For genotoxicity, the Comet assay was most common. Although data relevant to ecological exposures and the oral exposure route were prioritized, relatively few of such studies were available; the database contains more data relevant to inhalation exposure than from other exposure routes (such as dermal or ingestion). *In vivo* studies were performed mostly in rats, whereas *in vitro* experiments were mostly with human cells.

29. Examination of the database revealed gaps in the literature, and inconsistencies in performing, as well as in reporting assays in the experiments. We found that studies measured doses with a diversity of dose-metric (e.g. mg/L, µg/cm<sup>2</sup>, etc.) regimes, preventing direct comparisons. Further, direct light exposure may increase the activity of n-TiO<sub>2</sub> and change the biological effects during exposure, making this an important factor in experimental design; however, our analysis revealed that many studies do not report lighting conditions, making it a challenge to determine the photoactive state of the particles.

30.

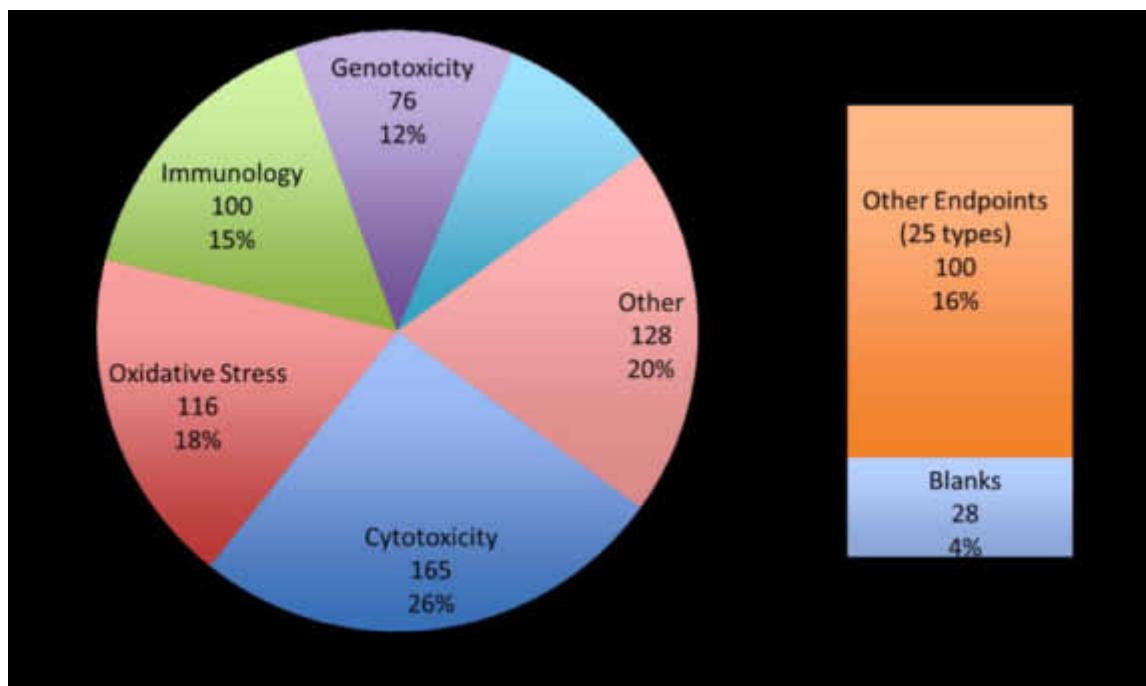


Figure 1: Distribution of endpoints analyzed

31. For example, p-chem properties such as the crystalline structure (*i.e.* percentage of anatase and rutile) and photoactivity, which can play a role in toxicity, are often not reported (Braydich-Stolle *et al.*, 2009; Ma *et al.*, 2012). Half of all results demonstrated no toxicity, while half reported effects at widely varying concentrations. These reported differential responses to nano-TiO<sub>2</sub> might be attributed to differences in the MN properties, cell types, dose and assay conditions, and lack of proper controls. We noted that a high proportion of reports did not account for MN-assay interferences, similar to previous observations noting that < 10% of peer-reviewed papers included appropriate controls for MN assay interference (Ong *et al.*, 2014). The observations made based on this case study highlighted the need for more standardized protocols for characterization, testing and data reporting as well as guidance or criteria for the evaluation of study reports. Evaluation criteria might relate to the use of particular protocols and avoidance of interferences.

32. Importantly, we recorded the experimental doses tested, and found that only 3% (1 of 35) of aquatic *in vivo* studies used a relevant environmental dose of  $\leq 16 \mu\text{g/L}$  Predicted Environmental Concentration (highest emission scenario; Mueller and Nowack 2008), 0% (0 of 58) of studies used relevant inhalation doses within even orders of magnitude of the National Institute for Occupational Safety and Health (NIOSH) Recommended Exposure Limit of  $0.3 \text{ mg/m}^3$  (NIOSH 2011) and 0% (0 of 8) used relevant ingestion doses of  $3 \mu\text{g/kg}$  body weight/day (Weir *et al.*, 2012), indicating a need for environmentally- and human-relevant studies in addition to studies performed at higher doses for the purpose of hazard identification.

33. Many of the *in vivo* studies were performed at “overload” levels, where biological effects may be observed but do not allow for clearance of the MNs, so are therefore not representative of realistic exposures. These longer term exposure (chronic) studies were infrequently performed. Presumably, corresponding “chronic” ATM are less accessible (or even not available) and more cost- and labour-intensive. There are significant gaps in ATS relevant to non-occupational exposure scenarios, including

ingestion, dermal exposure, and non-mammalian organisms. Few studies addressed material transformations in biological matrices. The uncertainty associated with studies in both *in vitro* and *in vivo* systems under unrealistic exposure conditions limits the reliance on these data in a risk assessment context.

34. The case study was circulated to participants prior to the workshop, and presented as a poster at the workshop (Annex II, and Annex V). A second phase of work, to link these data to a publicly available informatics database, was not completed, so the toxicity data are not currently linked to reported physical and chemical properties. Many of the data are from the WPMN dossier and could be readily linked at some future time. The overall goal is to make the database available to researchers and others. Utility of the database will demand that it be updated with a re-evaluation of studies for data quality and inclusion of p-chem properties.

## WORKSHOP PROGRAMME

35. The Society for Risk Analysis (SRA) organized a workshop on “Advancing risk analysis for nanomaterials: A workshop to explore how a multiple models approach can advance risk analysis of nanoscale materials” at George Washington University, Washington D.C. on September 15-16th, 2014. The programme can be found in Annex IV and list of co-sponsors and in-kind contributors in Annex VI.

36. The workshop sought to survey the state of the science in alternative test strategies (ATS) from a “multiple models” perspective to show areas of common findings from differing approaches, areas of greatest uncertainty, and priorities for follow up in applied research toward risk management of nanomaterials (MNs). Specifically, the workshop was planned to consider how to incorporate ATS into risk assessment for manufactured MNs, and to assess the potential for a multiple models approach to using ATS for risk screening and their reliability for predicting human outcomes that can increase confidence, decrease uncertainty, and inform risk-based decision making.

37. The workshop highlighted shared strengths and gaps in support of a Weight of Evidence (WoE) approach relying on ATS to inform context-specific decisions about risk from exposure to novel nanoscale materials. The specific decision focus for this first "state of the science and practice" evaluation was the initial set of decisions that a risk manager would need to make about seeking further (specific) data or declaring obvious safety for a novel nanoscale material. These decisions are typically termed screening-level decisions. The kinds of short-term alternative testing methods (ATMs) considered include *in vitro* and cell free assays that can be included in high throughput assays or the initial stages of tiered testing cascades.

38. To achieve the objectives established for the workshop, 58 participants including several from the WPMN and from academia, government, industry, and NGOs (see Annex VII for full participant list) gathered for one and one half days. Three white papers were prepared by invited speakers on the topics of human health, ecological, and exposure considerations regarding the use of ATS for MNs, led by Professor Vicki Stone of Heriot Watt University, Dr. Patricia Holden of UC Santa Barbara, and Dr. Monita Sharma of PETA International Science Collaborative, respectively.

39. Outputs from the workshop include:

- 1) new collaborations through funding partners and collaborating organizations;
- 2) five manuscripts submitted for a special edition in the journal *Risk Analysis*, including the workshop report, papers resulting from the discussion in the human health, ecological health, and exposure groups;
- 3) web publications (JA Shatkin and L Sheremeta, 2014. Nanomaterial safety: An international collaboration on *in vitro* testing strategies; <http://www.nanowerk.com/spotlight/spotid=36452.php>);
- 4) presentations to diverse audiences, including: the 2014 EPA/ OECD Expert Workshop on Categorizing Nanomaterials for Regulatory Decision Making (September 18-19, 2014, Washington, DC); Sustainable Nanotechnology Organization (November 2-4, 2014, Boston,



MA); and a Symposium at the Society for Risk Analysis Annual Meeting (December 5-8, 2014, Denver, CO); and,

- 5) presentations and this report to OECD WPMN on the ATS Pilot Project, which includes workshop findings.

40. The workshop experts from diverse fields also included 40% of participants from outside the U.S., 28% from private organizations/industry, 33% from governmental agencies, 12% from NGOs and 27% from academia. Women made up more than half of the participants, and there were both early career and emeritus attendees.

41. Workshop attendees were charged with:

- 1) *How can the findings from ATS and ATMs be used in combination with conventional testing methods to reduce uncertainty and better inform screening-level risk assessments (with respect to human health, ecosystem health, and exposure)?*

a) How can these findings **be used now** to amass a weight of evidence approach that supports risk assessment?

b) What strategies can be developed to increase the value of, and confidence in, the use of ATS findings in risk assessment?

- 2) *What additional work is needed in the near-term (3-5 years) so that ATS methods can better support risk assessments that inform screening-level risk management decisions (with respect to human health, ecosystem health, and exposure)?*

42. The workshop was structured into 3 sessions for each topic and a poster session, starting with all participants being involved in the State of the Science (SOS) presentations and group roundtables, then the members divided into breakout groups (full programme found in Annex IV). For the SOS presentations, three white papers were developed and presented for each of these topics by leading experts in each field (Annex III), followed by 3-person panelist discussions, and finishing with interactive audience participation. These presentations helped formulate a common foundation amongst participants for the breakout sessions (Annex VIII). Based on these presentations, workshop participants held roundtable discussions as a group, during which these topics were further elaborated discussed from different viewpoints. Then, participants joined one of three breakout groups (human health, ecological health, and exposure assessment issues) where focused discussions were held regarding the concepts in the white papers, the presentations, and recommendations for research needs and next steps. Each breakout group presented IATA conclusions to all participants, and the workshop finished with a plenary discussion, conclusion, and summarizing of the next steps.

43. Below is a summary of the conclusions, and recommendations follow. Detailed reports of each session can be found in Annex IX.

## CROSS-CUTTING IDEAS AND RECOMMENDATIONS

44. Experts and participants agreed that ATS are useful as they, for the most part, require fewer resources, are less time intensive, are generally higher throughput, and are cost effective. A multiple models approach incorporating IATA, tiered approaches, and WoE analysis will increase confidence but require effort to coordinate and standardize testing and methods. At this stage, the results from these tests will provide supplemental value to leverage better and more relevant data from whole-animal tests and allow for better interpretation of the results. ATS can be useful for screening, prioritization, and reduction of uncertainty, as long as potential limitations, especially those related to MN (*e.g.*, lack of physiological complexity, issues of reproducibility, metrology, distinction between acute and chronic exposures and effects, and potential for interferences) are considered. It is envisioned that these data will allow for the development of more focused/targeted tests that will inform risk assessment for next 3-5 years. Key recommendations from the breakout groups overlapped significantly and are summarized here:

### **Develop and foster data sharing systems and collaborations**

45. Development of ATS relies on contributions from many different areas of the nanoscience community. Risk assessment of MN would benefit from improved access to large data sources, enabling more efficient collaboration. The development of open databases, shared forums, or other data-sharing formats capable of storing large amounts of data could strengthen the ability to perform risk assessment and to share knowledge. Participants indicated that although a number of large databases exist that contain information on useful assays, targets of accumulation, and *in vitro* and *in vivo* effects, many of these databases are not easily accessible. Publication bias against negative results can present an unbalanced view of MN toxicity; to counter this, researchers should be conscious of this bias when performing hypothesis-driven investigations, editors must be willing to accept negative results, and risk assessors must take care when using published literature.

### ***Recommendations***

- Specify standards for the funding of studies or publication of results, especially for funders and publishers, who can determine requirements such as availability, consistency and quality of data;
- Create platforms for data sharing and storing large amounts of data (*e.g.* user-friendly databases, wiki, *etc.*);
- incentivize researchers to make data public.

### Data mine existing databases and literature

46. A wealth of relevant data exists in the published literature, OECD datasets, industrial datasets, and other such compilations. This information can be used to assess testing protocols, substantiate results, and determine replicability of studies. Including data mining as part of an integrated testing system can help screen and identify MN, pathways, endpoints, and data gaps of particular concern.

47. Research gaps in the environmental and occupational data (e.g. Dr. Vicki Stone white paper), and the TiO<sub>2</sub> case study developed for this workshop identified a low level of consistency in data collection and reporting, and a diversity of reported responses, which limit the ability to compare studies for specific toxicological outcomes. Therefore, data mining and comparison of results may be improved by creating datasets of well-characterized materials in carefully designed and/or standardized studies. Data mining efforts, such as analysis of p-chem properties, in the context of relevant nano-specific characteristics, as part of categorization and grouping of MN, will advance the understanding of key testing parameters and relationships.

48. In data mining, it is essential to incorporate some element of data quality evaluation of previously developed information, in terms of certainty around materials tested and consistency in data obtained. Some participants suggested using a publication date (e.g., after 2010) as a threshold for acceptance of studies, while others suggested categories for data quality (e.g. the study reports a minimum set of p-chem measurements).

### Recommendations

- Develop and implement robust statistical methods appropriate for mining the existing data sets;
- Determine which ATMs are appropriate for use and correlate to human or environmental health, especially low dose chronic exposure;
- Ensure that researchers consistently report relevant experimental details, such as context- and receptor-specific parameters (e.g., relevant exposure route); and
- Develop protocols for assessing data quality of existing *in vitro*, human and *in vivo* data for screening information.

### Perform environmentally and biologically relevant testing

49. All three breakout groups agreed on the potential for using ATS for testing MN at relevant concentrations, under more realistic exposure conditions and for screening relative to traditional substances and toxicological effects of bulk materials. Deliberation, determination, and assessment of potential realistic situations, such as the conditions of MN release and subsequent MN life-cycle transformations will help direct ATS development.

50. Using relevant dosimetry based on findings from occupational or environmental monitoring studies will be helpful in assessing risk based on realistic exposures. Although high concentration, short duration exposures may be informative to determine concentrations that can elicit toxicity, the mechanisms of toxicity, and to elucidate health effects associated with incidents that result in high levels of acute exposure (e.g., from spills or other accidental releases), repeated and/or chronic exposure at lower concentrations is generally more realistic for occupational, consumer and environmental exposures. Standardizing test conditions to represent meaningful exposure modes, durations and concentrations are

implementable now and are a practical complement to short duration, high concentration exposures for predicting MN effects.

51. One issue emphasized during the discussions is the need for reliable analytical methods to measure MN in complex biological and environmental media to aid context-specific testing. There are established tools and techniques to characterize MN in their pristine form, but most of the techniques have limitations when it comes to assessing MN in complex ecological and biological matrices (von der Kammer *et al.*, 2012). Such limitations could be overcome by developing new tools, by modifying existing techniques, and by using multiple techniques to characterize MN. Despite ongoing efforts by WPMN, ISO and others to develop a standardized list of essential p-chem parameters, this remains a challenge.

52. Research determining the fate of MN in both human and ecological exposure scenarios will help identify the target organisms and organs most susceptible to MN exposure. Identifying the route of exposure of a MN will highlight the organs, systems, or organisms likely to receive the highest initial dose, then toxicokinetic studies (and/or appropriate PBPK models) can direct researchers to focus on cells, organs, and tissues that may be in contact with MN. The biologically effective dose, or the amount of contaminant that interacts with the internal target tissue or organ, may be different than the initial measured or administered dose of MN. In addition, identification of at-risk and/or sensitive populations can help prioritize testing.

53. Further, biotic and abiotic molecules, such as serum albumin or natural organic matter, can bind and interact with MN and change their surface p-chem properties and distribution; these molecules can form a corona around the MN, altering bioavailability, transport, toxicity, etc. These alterations will change how the particles are “seen” by the receptor, at the biological exposure sites. For example, MN incorporated into food products could undergo transformation in the saliva, which could in turn change how they are presented to gut microflora. In aquatic systems, MN may interact with natural organic matter, such that it will not be in pristine form when taken up by detritivores. Protocols can be developed to ensure that ATS are testing the appropriate MN form, and that they therefore represent the most realistic exposure scenario. For example, MN of respiratory concern could be first coated in natural lung lining fluid before presentation to cells, and MN of aquatic concern could be incubated in natural waters before being introduced to aquatic fauna.

54. Simulating realistic scenarios is of utmost concern to improve risk assessment and to determine which areas are of highest concern; in particular, it will be necessary to focus on environmental realism to help illuminate which impacts beyond acute toxicity (notably lethality) may be of concern (*e.g.*, by incorporating variables to assess low-dose chronic toxicity, nutrient cycling, UV intensity). Until our understanding of MN behavior is improved, comprehensive p-chem measurements under these different exposure scenarios will be beneficial for inferring MN toxicity, at least for screening analyses. Due to transformations that take place during a MN life-cycle (*e.g.*, aggregation/ agglomeration, dissolution, corona formation), MN p-chem characterization is necessary at various stages throughout the product life-cycle (*i.e.*, as manufactured, as tested, as used, and as released following disposal) to understand how modification of p-chem characteristics can influence the MN behavior. The ultimate goal is to understand the connections between p-chem properties, exposure, hazard, and toxicity, so as to minimize the need to fully characterize and test every material for risk assessment.

### ***Recommendations***

- Identify routes of exposure of MNs and use relevant models;

- Use context-specific doses;
- Measure at relevant time points;
- Move forward with toxicokinetics testing, as a pre-requisite for PBPK modeling.
- Use appropriate biological or environmental media to ensure MN has formed realistic corona;
- Measure MN p-chem changes throughout the material life-cycle;
- Develop tools, instrumentation, and/or assays to measure MN p-chem characteristics;
- Develop a standardized list of essential p-chem characteristics;
- Test worst case conditions;
- Identify at-risk and sensitive populations;
- Incorporate biological and environmental complexity;
- Test the most sensitive groups or species.

### **Ensure consistency between studies**

55. Determination of relevant dose and standardization of dose metrics has long been a challenge for MN, and has hindered comparison between *in vitro* and *in vivo* studies. The TiO<sub>2</sub> case study found that *in vitro* experiments relevant to inhalation exposure often used mass per surface area and mass per volume, however mass per animal weight, or mass per unit volume of air is most often used for *in vivo* dosing.

56. Research to determine suitable positive and negative material controls or reference materials is still ongoing; gathering more information about MN p-chem properties and using well-characterized reference materials (*e.g.*, from National Institute of Standards and Technology [NIST]) or representative industrial nanomaterials (*e.g.*, from Joint Research Center [JRC] repository) for comparison purposes would facilitate progress toward this goal. The inclusion of conventional or ionic controls (in the case of soluble MNs) will also be important for such comparisons.

57. Many ATS include biochemical assays and other established methods used for conventional chemicals, but MN can potentially interfere and generate inaccurate results possibly leading to the determination of false positives or negatives, and/or to the creation of conflicting results among studies. For instance, MN have interfered with the optical density readings for tetrazolium-based assays such as MTS and MTT; however, removal of MN via centrifugation before reading the assay reduced the variations in generated data (Xia *et al.*, 2013). Some assays may be less susceptible to such effects, and interference should be assessed on a case-by-case basis (Kroll *et al.*, 2011, Ong *et al.*, 2014). Therefore, the use of a multiple models strategy, comparing results of different assays with the same intended outcome (*e.g.*, MTT and alamar blue for cytotoxicity) across a number of studies can provide evidence for choosing appropriate assays. Furthermore, choosing multiple assays to evaluate the same toxicity endpoint can also help highlight and mitigate the limitations of any particular assay.

### **Recommendations**

- Use comparable dose metrics between *in vitro* and *in vivo* studies;
- Control for MN-assay interference by removing MN, and/or using relevant negative and positive controls;
- Perform multiple assays that test for the same outcomes to increase confidence in results.

## RECOMMENDATIONS TO START NOW FOR 3-5 YEAR RESULTS

58. While much of the work can be done immediately, the participants discussed which actions were needed now, or in the near future, to advance knowledge and practice in 3-5 years time. The following were suggested:

### **Determine how MNs are similar to, and differ from, conventional chemicals**

59. Some MNs have similar toxicity profiles to their bulk or ionic counterparts, and therefore may not require additional testing. Benchmarking MNs against conventional chemicals could expedite testing and help prioritization. To achieve this, diagnostics must be developed to determine when MNs behave more like conventional chemicals and when their nanoscale properties create novel behaviour. Work performed on fine or particulate matter may be applicable for MNs. Models used for other chemicals, such as pesticides, may be applicable to MNs.

### **Harmonize testing procedures and reporting**

60. Harmonization of standardized operation procedures (SOPs), including reference materials and appropriate controls, media and conditions, and technologies/equipment, as well as harmonization of information reporting will result in faster, more consistent, and more reliable data generation. However, until appropriate assays and tests are validated, and the relevant MN properties are identified, coordination will be difficult. Ideally, SOPs will be applicable to a wide-range of MNs, however it is possible that harmonization may not be feasible due to the variability amongst MNs (*e.g.* metal ion shedding vs non-metal ion shedding MNs). In this case, the goal may be to produce SOPs for particular groups or categories of MNs, or include preliminary testing steps for appropriateness (*e.g.* do a wavelength scan of the MN itself prior to performing assays dependent on absorbance or fluorescence).

61. To ultimately achieve this goal, it would be practical to begin narrowing the list of available methods and excluding those not appropriate for MNs. For example, a commonly used cytotoxicity test, the MTT assay, is interfered with by many MNs, particularly at higher concentrations (Worle-Knirsh *et al.*, 2009; Holder *et al.*, 2012; Kroll *et al.*, 2012). The mechanism of interference differs between MNs and is difficult to predict, therefore its suitability for MN testing may be limited, especially in light of the numerous other ATMs available for cell viability testing.

### **Perform occupational and environmental exposure monitoring**

62. As more MNs are produced and incorporated into consumer products and services, exposure monitoring will be important for tracking of MN movement and concentration, and to allow for development and confirmation of *in silico* modeling. Therefore, sample collection, monitoring, and detection and measurement technologies for MNs in complex matrices, such as air, water, and soil need to be developed and improved to be sensitive enough to detect small particles at small concentrations, and well as for identification of materials. This will allow relevant exposure parameters such as dosimetry, conditions, and duration for ATS, and validate computational models for prediction purposes. In

conjunction with this, development of *in silico* and informatics techniques should be prioritized to minimize reliance on *in vivo* testing and limit our need to perform extensive, costly, and time-consuming testing.

### **Develop appropriate MN groupings**

63. Grouping and read-across are concepts that may be used for MN risk assessment, but methods are currently inconsistent. A number of different methods, such as heat and self-organizing maps to group MNs by bioactivity, the use of p-chem data to inform structure-property relationships (SPRs), structure-activity relationships (SARs), and quantitative structure-activity relationships (QSARs), or Principal Component Analysis (PCA) methods to help identify the weight of contributions of different p-chem properties to toxicity, can be employed. Existing data can be mined to establish rationale for groupings. This strategy may also be a quick method to prioritize MNs for further assessment, and can be used in many ways to get general overview or specific concerns. If groupings for MNs can be established, then tiered approaches and procedures can be developed for these groups. Furthermore, targeted testing can be performed as a way to increase confidence in the group identification.

### **Develop Adverse Outcome Pathway frameworks**

64. ATS that incorporate adverse outcome pathway (AOP) frameworks can facilitate the connection between mechanistic and ecologically relevant / health related outcomes. AOPs provide a practical solution to data organization and generation of meaningful information from the available data. AOPs build from a conceptual framework that describes a sequential chain of causally linked events at different levels of biological organization that lead to an adverse bio- or eco- toxicological effect. Similarly, the concept of exposure pathways can also be incorporated into AOP use in order to capture transformations of particles in key scenarios with underrepresented endpoints. AOPs are increasingly becoming more useful for risk assessment and reducing *in vivo* testing.

65. The continued gathering of mechanism-related data through *in vitro*, HTS, HCS, and other alternative methods will help identify nano-specific effects at each level. The improvement and consistency of data collection will aid cross-comparison and collection of data to be used in an AOP. Development of AOPs for MNs can be cultivated using the AOP-Wiki, a central repository for AOPs that serves as a platform for sharing AOP-related knowledge based on existing data. AOPs provide a framework for organizing data from MN studies and can be used to develop intelligent testing strategies or IATAs based on mechanism.

### **Consider complex conditions**

66. Currently, testing is usually performed in relatively straightforward conditions with pristine materials to allow for basic toxicity testing in single organisms or cells. While these studies improve our understanding of the underlying mechanisms of toxicity, as previously mentioned, these ultimately will not be representative of realistic situations. As ATM and ATS are developed, we must consider the form of MNs in the final product, their entire life-cycle, and also consider co-exposures with other materials. More information is needed on low dose, chronic endpoints; these can be informed by acute studies, but must be performed otherwise will miss important effects. Assays with long-term relevance must be incorporated into ATS. Risk exposure pathways and MN fate studies need to be performed. In the near term, we need to encourage risk-contextualized relevance in basic research, and create incentives to do research that is relevant to testing needs for decision-making.

**Advance MN safer-by-design principles**

67. Rather than perform safety testing post-development and production of a nano-enabled product or service, it is preferable to develop MN applications that are “safer-by-design”. To allow for this, recommendations and ATS can start to be compiled that can be used by industry to develop safe nano-enabled products. Some materials can be ruled out, or prioritized, based on the results from alternative testing. Producers can start incorporating decision making feedback into material design, and should take a life-cycle perspective, incorporating current knowledge of how MNs behave in various matrices.



## CONCLUSION

68. The OECD WPMN project successfully achieved its objectives of informing the development of guidance for ATM and ATS. As described here and in the Annexes, the objectives were met. The case study and State of the Science report identified knowledge gaps in the research and data, inconsistencies amongst the testing methodologies and reporting of MN toxicity studies, and highlighted existing and emerging ATMs and ATS. The papers, presentations, and expert discussion stemming from the workshops further discussed these issues, highlighting the utility of ATS for screening level decisions at present. Ultimately, the efforts of the project produced a list of immediately implementable recommendations on how to improve the progress and growth of ATS using a multiple models approach.

69. The project generated specific and community-wide action items for advancing the use of ATS in MN risk assessments. The development, improvement, validation, and standardization of realistic and relevant ATM and ATS is critical to generating data that will support categorization and read-across. The ongoing development of ATS will allow for screening and prioritization of hazardous MNs, with the goal of eventually gaining enough information and understand to fully move away from *in vivo* testing. As discussed, some unique considerations are necessary when adapting or developing ATS for MNs, but can be addressed through community collaboration and data sharing, performance of appropriate and applicable tests, and thorough reporting and dissemination of results. As we simultaneously continue to learn more about the performance of testing methods, the key predictive characteristics of MNs and their testing environments, and the realistic use and exposure of humans and ecosystems to MNs, salient risk assessments will require ongoing and iterative communication of findings across the diverse array of disciplines and sectors represented in this project.

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## ANNEXES

70. The following Annexes will be made available as an addendum to this document, i.e.:

- state of the science report
- TiO<sub>2</sub> case study
- white papers
- workshop programme
- posters (sos and TiO<sub>2</sub> case study)
- participant list