

# Read-across initiatives to replace animal testing

**Thomas Hartung & team**  
**Center for Alternatives to Animal Testing**



**A CENTURY OF SAVING LIVES  
MILLIONS AT A TIME**

**JOHNS HOPKINS**  
BLOOMBERG SCHOOL  
OF PUBLIC HEALTH

**1981**



**Stakeholder  
Platform**



**2010**



**Transatlantic  
Hub**

**2012**



**CAAT EU Policy  
Program**





# Thanking our sponsors (industry, philanthropy, agencies)

## Current



*Space for  
You!*



...and individuals



EUROPEAN  
COMMISSION



## Recent



Unilever



# *Conflict of Interest Statement*



**Founder  
(organoids)**

**ORGANOME**

AstraZeneca  **Consultant**



**Consultant  
Computational  
Toxicology**



**Licensed  
Pyrogen Test  
Consultant**

# The problem:

**Complex mixture**

**Many unknown**

**Variable composition**

## UVCB

**Mass-spectrum of diesel fuel**

**And a lot of it...**

**Individual  
substances**

**Test needs  
by tonnage**



Skin Irritation 1.200 €  
Skin Sensitization (LLNA)  
4.700  
Oral Acute Toxicity 4.500  
Inhalation Acute Toxicity  
3.900  
Dermal Acute 1.500  
Repeated Dose 28d  
46.500  
Repeated Dose 90d  
106,000  
Mutagenicity 62.500

Carcinogenicity 700.000 €  
Developmental Tox  
63 – 112.000  
ReproTox 1gen rat  
77.700  
ReproTox 1gen rabbit  
126.000  
ReproTox 2gen rat  
328.000  
ReproTox 2gen rabbit  
481.000  
Long-term fish 8.600

**ALTEX 2018, 35:275-305**



# REACH



Originally expected:

- 180.000 pre-registrations by about 27.000 companies
- 30.000 substances

State of the play 12' 08:

- > 27 million pre-

nature

Vol 460|27 August 2009

## OPINION

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# Chemical regulators have overreached

The costs — both in animal lives and euros — of the European REACH legislation on chemical testing are escalating. **Thomas Hartung** and **Costanza Rovida** argue for a suspension of certain toxicity tests.

# How are we doing?

## - animal numbers

Substances by registration deadline (cumulative)	2010	2013	2018	Animals used
Commission estimate (2003)	2,704	5,165	29,324	4 million ( <i>van der Jagt, 2002</i> ) 8 -13 million ( <i>ECVAM best –worst case, 2006</i> )
Actual	4,599	8,729	49,851	If we get 70% as many registrations in 2018 we could
Total:			13,328	looking at least 6 million animals
Our prediction: 12,007				

## How are Reproductive Toxicity and Developmental Toxicity Addressed in REACH Dossiers?

*Costanza Rovida<sup>1</sup>, Fabiola Longo<sup>2</sup>, and Richard R. Rabbit<sup>1</sup>*

<sup>1</sup>Center for Alternatives to Animal Testing (CAAT)-Europe, University of Konstanz, Germany; <sup>2</sup>Private Consultant, Malnate, Varese, Italy

***The number of animals used ... first REACH deadline, is very high; it may add up to 1.6 million animals just to accomplish reproductive and developmental toxicity endpoints if the data collected from 400 dossiers are extrapolated to the total number of registered substances.***

**40% existing data (but quality concerns), only 11% propose tests**

**The ultimate burden of REACH  
depends on how petrochemicals  
are handled**

Food for Thought ...

**ALTEX 2018, 35:275-305**

# **Animal Testing and its Alternatives – the Most Important Omics is Economics**

*Lucy Meigs<sup>1,2</sup>, Lena Smirnova<sup>2</sup>, Costanza Rovida<sup>3</sup>, Marcel Leist<sup>3</sup> and Thomas Hartung<sup>2,3</sup>*



**Tox: \$18.6 billion (14,4 *in vitro*, 4,2 *in vivo*)**

**40% of chemical industry is now in China  
EU down from 35% to 15% in one decade**

**Sales in Europe 25.9% petrochemicals**

**REACH: registered as categories with unclear  
acceptability**



***REACH: Data-rich substances  
registered 2010 and 2013:***

**75% of dossiers use read-across**

**Other alternatives hardly used**

**Expertise in industry low**

**Low acceptance by EChA**



***Read-across***

**Data gap filling concluding  
from (structurally) similar  
chemicals**

***Category approach***

**Test only representatives  
of a group of similar  
chemicals or complex  
mixtures**

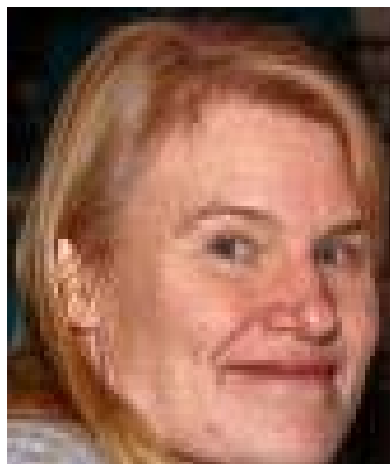
# Data gap filling from similar chemicals

*Traditional Read-Across has  
a smell of GOBSAT*

- Simplistic identification of similar chemicals driven by data availability
- Good Read-Across Practice only emerging
- One-to-one or one-to-few read-across
- Cannot be validated

**But it works and is broadly used in REACH!**

# CAAT Read-Across Program



## Food for Thought ... Read-Across Approaches – Misconceptions, Promises and Challenges Ahead

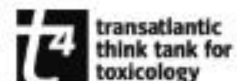
*Grace Patlewicz<sup>1</sup>, Nicholas Ball<sup>2</sup>, Richard A. Becker<sup>3</sup>, Ewan D. Booth<sup>4</sup>, Mark T. D. Cronin<sup>5</sup>,  
Dinant Kroese<sup>6</sup>, David Steup<sup>7</sup>, Ben van Ravenzwaay<sup>6</sup> and Thomas Hartung<sup>9</sup>*



**t4 report\***

## Toward Good Read-Across Practice (GRAP) Guidance

*Nicholas Ball<sup>1,5\*</sup>, Mark T. D. Cronin<sup>2\*</sup>, Jie Shen<sup>3\*</sup>, Karen Blackburn<sup>4</sup>, Ewan D. Booth<sup>5</sup>,  
Mounir Bouhifd<sup>6</sup>, Elizabeth Donley<sup>7</sup>, Laura Egnash<sup>7</sup>, Charles Hastings<sup>8</sup>, Daland R. Juberg<sup>1</sup>,  
Andre Kleensang<sup>6</sup>, Nicole Kleinstreuer<sup>9</sup>, E. Dinant Kroese<sup>10</sup>, Adam C. Lee<sup>11</sup>, Thomas Luechtefeld<sup>6</sup>,  
Alexandra Maertens<sup>6</sup>, Sue Marty<sup>1</sup>, Jorge M. Naciff<sup>4</sup>, Jessica Palmer<sup>7</sup>, David Pamies<sup>6</sup>, Mike  
Penman<sup>12</sup>, Andrea-Nicole Richarz<sup>2</sup>, Daniel P. Russo<sup>13</sup>, Sharon B. Stuard<sup>4</sup>, Grace Patlewicz<sup>14</sup>,  
Bennard van Ravenzwaay<sup>10</sup>, Shengde Wu<sup>4</sup>, Hao Zhu<sup>13</sup> and Thomas Hartung<sup>6,15</sup>*



**t4 report\***

## Supporting Read-Across Using Biological Data

*Hao Zhu<sup>1</sup>, Mounir Bouhifd<sup>2</sup>, Elizabeth Donley<sup>3</sup>, Laura Egnash<sup>3</sup>, Nicole Kleinstreuer<sup>4</sup>,  
E. Dinant Kroese<sup>5</sup>, Zhichao Liu<sup>6</sup>, Thomas Luechtefeld<sup>2</sup>, Jessica Palmer<sup>3</sup>, David Pamies<sup>2</sup>,  
Jie Shen<sup>7</sup>, Volker Strauss<sup>8</sup>, Shengde Wu<sup>9</sup> and Thomas Hartung<sup>2,10</sup>*

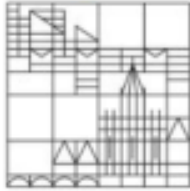
# **Regulatory Acceptance of Read-Across: Report from an International Satellite Meeting at the 56<sup>th</sup> Annual Meeting of the Society of Toxicology**

Megan Chesnut,<sup>1</sup> Takashi Yamada,<sup>2</sup> Timothy Adams,<sup>3</sup> Derek Knight,<sup>4</sup> Nicole Kleinstreuer,<sup>5</sup> George Kass,<sup>6</sup> Thomas Luechtefeld,<sup>1</sup> Thomas Hartung,<sup>1,7</sup> and Alexandra Maertens<sup>1</sup>





Universität  
Konstanz

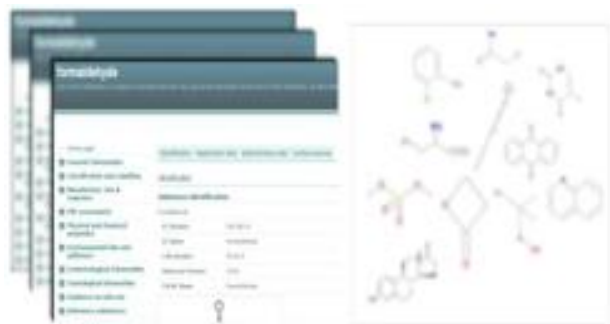


# **Think tank on “Read across as validated *in vitro* tool for regulatory toxicology“**

Hotel Belvedere Ranco (Lago Maggiore), Italy (<https://bit.ly/2KvYOA0>)

**16<sup>th</sup> to 18<sup>th</sup> July 2018**





**10,000 chemicals  
800,000 tox  
studies  
(Dec 2014)**



**Natural language  
processing  
(Feb 2016)  
&  
Web app**

**TOXTRACK**



**Tom Luechtefeld**



Nature online and  
Scientific American



Initial irritation by EChA  
Resolved in mtg. 4'2016  
Led to data release 3'2017

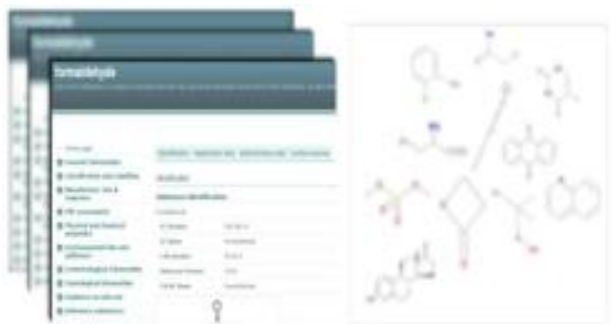


Chemical Watch  
5 July 2017

## News & features

### Echa gives clarity on IP issues for Qsar predictions

*“A registrant would need permission to use protected data to read-across from a single substance to the target substance, ... But they would not need this to make a Qsar prediction.”*



10,000 chemicals  
800,000 tox  
studies  
(Dec 2014)



Natural language  
processing  
(Feb 2016)  
&  
Web app

**ToxTRACK**



10+ million  
chemicals  
300,000 with biol.  
& 20,000 with  
animal data  
(Mar 2017)

# **RASAR - A marriage of technologies**

## **Read-across**

- **Support weight of evidence**
- **Circumstantial**
- **Manual**
- **Unclear acceptability**

## **(Q)SAR**

- **Data-mining by computer**
- **Broader applicability**
- **Can be validated with enormous consequences for acceptability**

## **Read-Across-based Structure Activity Relationship = RASAR**

- **Mines local “similarity space”**
- **Comprehensive use of available data (data fusion)**
- **Expresses certainty**
- **Validation on the way**



The map of the  
chemical universe

Similarity =  
proximity

ARTIFICIAL  
INTELLIGENCE  
0,5 BILLION  
CALCULATIONS  
PER PREDICTION  
+ CERTAINTY





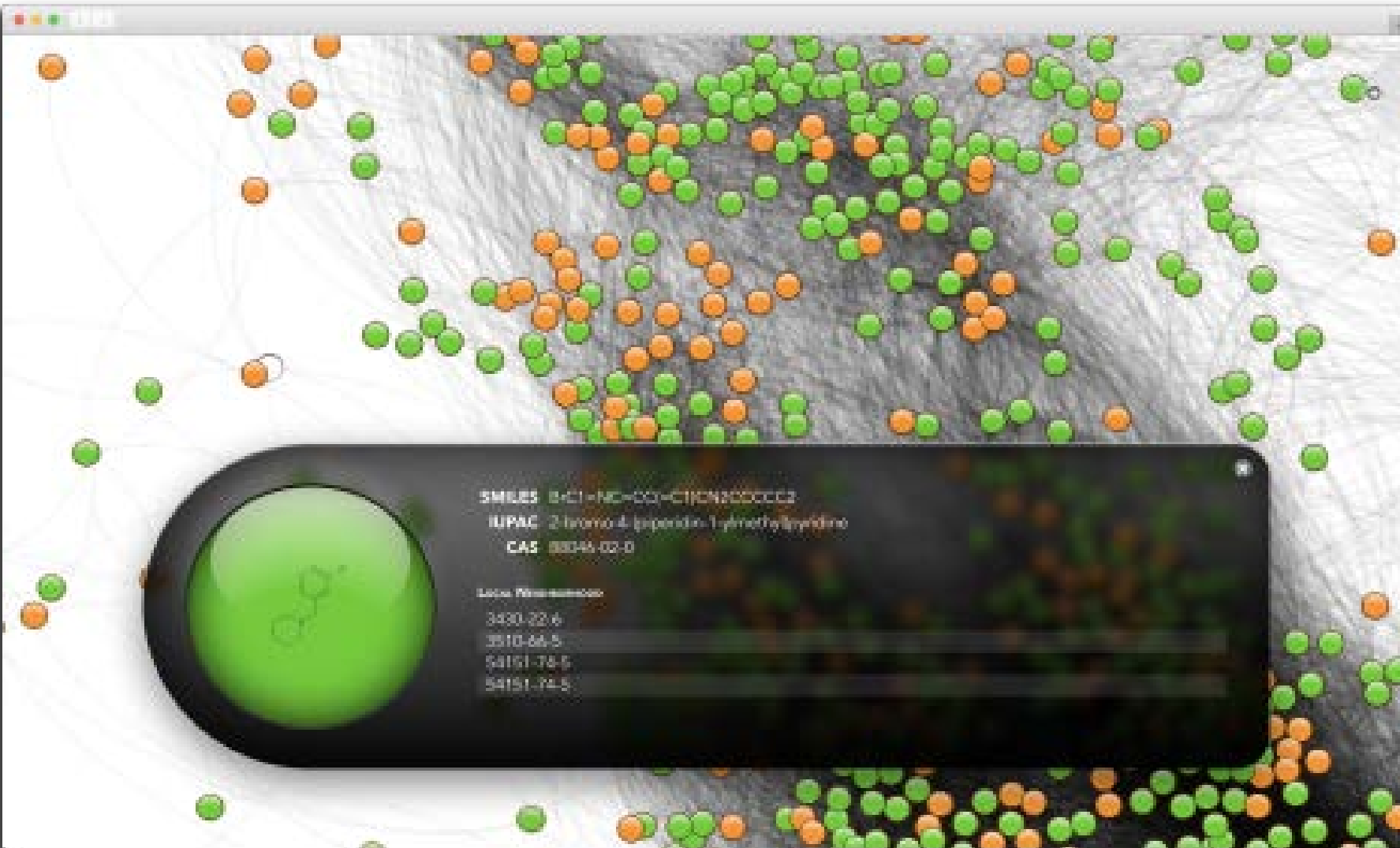
# CHEMICAL UNIVERSE – CURRENT DATABASE



COLLABORATION

**10 million compounds**  
**50 trillion comparisons**

**2 days on Amazon  
cloud server**



**Table 1** Sensitivities (Se) and specificities (Sp) for 6 health hazard models built from thousands of classification and labelling results stored on the ECHA database

Endpoint	Tested	Se	Sp	Coverage
Skin sensitization	5136	83%	55%	83%
Eye Irritation	15 214	83%	54%	79%
Acute oral	12 342	82%	71%	77%
Mutagenicity	4077	80%	58%	81%
Skin irritation/corrosion	14 718	88%	57%	64%
Acute dermal	6732	89%	70%	59%

**58,000 predictions, 42,500 possible**

# Toxicology Research

REVIEW

[View Article Online](#)


[View Journal](#)



Check for updates

Cite this: DOI: 10.1039/c8tx00051d

## Big-data and machine learning to revamp computational toxicology and its use in risk assessment

Thomas Luechtefeld,<sup>a</sup> Craig Rowlands<sup>b</sup> and Thomas Hartung  <sup>\*a</sup>

**Toxicological Research 2018, in press, doi:10.1039/C8TX00051D**  
**Available online**

# The next level: DATA FUSION

**Do not analyze  
hazards  
independently,  
but let them  
inform each  
other**

Published 11 July 2018

ACCEPTED MANUSCRIPT

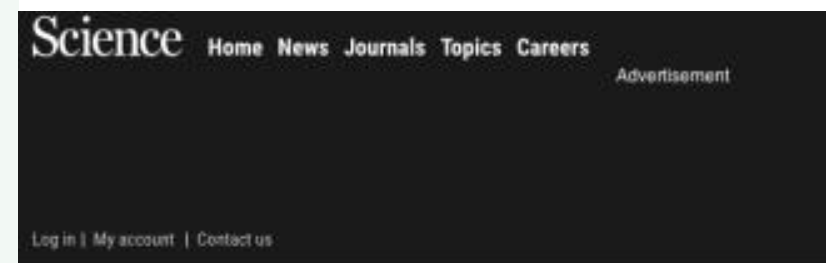
# Machine learning of toxicological big data enables read-across structure activity relationships (RASAR) outperforming animal test reproducibility



Thomas Luechtefeld, Dan Marsh, Craig Rowlands, Thomas

Toxicological Sciences, kfy152, <https://doi.org/10.1093/tox>

**Published:** 11 July 2018



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NEWS • 11 JULY 2018

## Software beats animal tests at predicting toxicity of chemicals

Machine learning on mountain of safety data improves automated assessments.



An estimated 3 million to 4 million rabbits, rats, and other animals are used annually around the world for chemical safety tests. CAIRNEY DOWN/ALAMY STOCK PHOTO

### New digital chemical screening tool could help eliminate animal testing

By Vanessa Zainzinger | Jul. 11, 2018, 11:00 AM



## Then next level: DATA FUSION

Hazard	Chemicals	Sensitivity	Specificity	BAC %	ACC %
Acute Aquatic Binary	10,541	95	94	95	95

**190,000 predictions**  
**87% correct**

Skin Corrosion Binary	46,331	98	75	86	97
Skin <u>Sensitisation</u> Binary	7,670	80	96	88	84

**Coverage 100% !**

**Six most used tox tests - 55% of animals in tox**

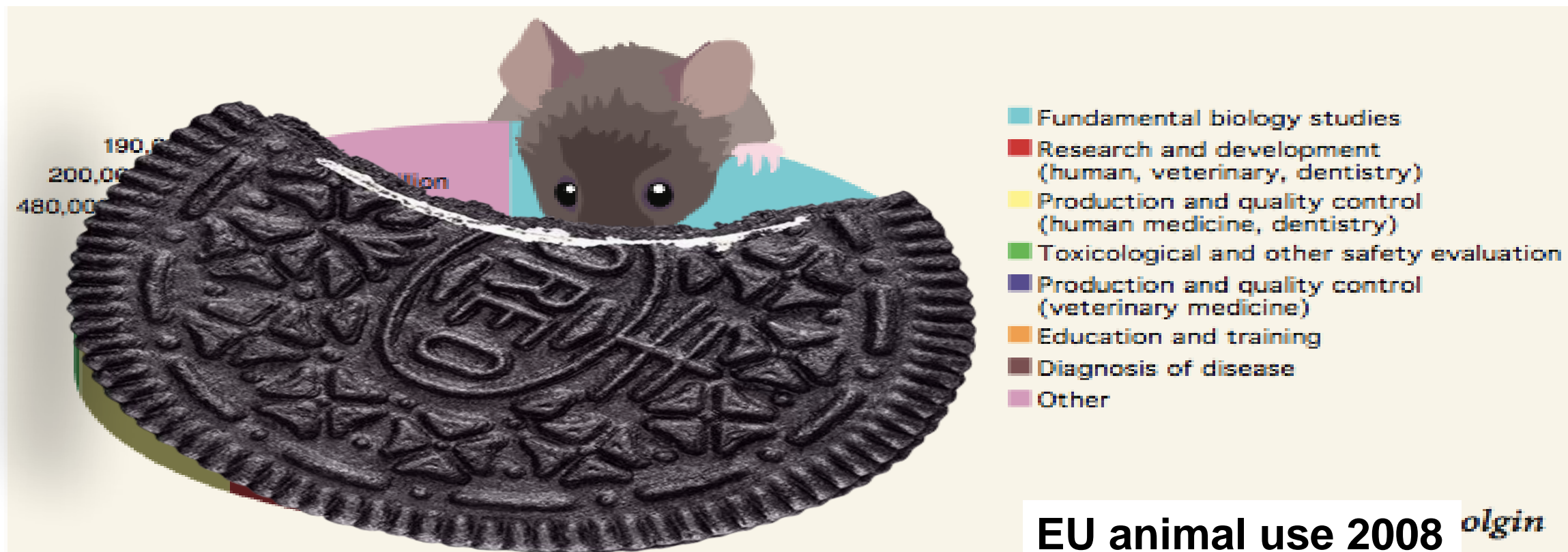
**Animal repeat test: 81% (balanced) accuracy**

**A.I. prediction: 87 % (balanced) accuracy**

**for 4-48.000 chemicals with animal data**

**2018 first regulatory acceptance of REACH*across*  
(Korea)**

**Luechtefeld et al., ToxSci 2018**



**The 9 tests consume 5-600.000 animals  
in Europe per year**

Formal validation will have to show,

**simple.**

whether we can get information for the  
most used animal tests now by pressing  
a button?

# *The 4R*

**The 4<sup>th</sup> R?**

**Read-across**

**Refine**

**Replace**

**Reduce\***

**\*pesticides**

**Does not (yet) help for  
complex (expensive)  
endpoints**

**Usefulness for  
mixtures only starting  
to be explored**



## Mixture Toxicology Collaboration

- **Failure of many alternatives for mixtures**
- **Petrochemicals and REACH**
- **Cosmetic end-product testing**
- **Pesticide minimal formulation changes**

**We need new approaches**

*"The difficulty lies, not in the new ideas,  
but in escaping from the old ones."*  
John Maynard Keynes (1883-1946)

*"This report, by its very length, defends  
itself against the risk of being read."*  
Winston Churchill (1874-1965)

## **t4 Report\***

# **A Roadmap for the Development of Alternative (Non-Animal) Methods for Systemic Toxicity Testing**

*David A. Basketter<sup>1,§</sup>, Harvey Clewell<sup>2,§</sup>, Ian Kimber<sup>3,§</sup>, Annamaria Rossi<sup>4,§</sup>,  
Bas Blaauboer<sup>5</sup>, Robert Burrier<sup>6</sup>, Mardas Daneshian<sup>7</sup>, Chantra Eskes<sup>8</sup>, Alan Goldberg<sup>9</sup>,  
Nina Hasiwa<sup>10</sup>, Sebastian Hoffmann<sup>11</sup>, Joanna Jaworska<sup>12</sup>, Thomas B. Knudsen<sup>13</sup>,  
Robert Landsiedel<sup>14</sup>, Marcel Leist<sup>15</sup>, Paul Locke<sup>9</sup>, Gavin Maxwell<sup>16</sup>, James McKim<sup>17</sup>,  
Emily A. McVey<sup>18</sup>, Gladys Ouédraogo<sup>19</sup>, Grace Patlewicz<sup>20</sup>, Olavi Pelkonen<sup>21</sup>,  
Erwin Roggen<sup>22</sup>, Costanza Rovida<sup>23</sup>, Irmela Ruhdel<sup>24</sup>, Michael Schwarz<sup>25</sup>,  
Andreas Schepky<sup>26</sup>, Greet Schoeters<sup>27</sup>, Nigel Skinner<sup>28</sup>, Kerstin Trentz<sup>29</sup>, Marian Turner<sup>30</sup>,  
Philippe Vanparys<sup>31</sup>, James Yager<sup>32</sup>, Joanne Zurlo<sup>9</sup>, and Thomas Hartung<sup>33,§</sup>*





Brussels, March 2012



DC, May 30-31, 2013



Stakeholder Fora

**A Roadmap for the Development  
of Alternative (Non-Animal) Methods  
for Systemic Toxicity Testing**

# Joint CAAT – BASF - EU-ToxRisk think tank

May 15th to 17th 2017

on “Alternative Approaches for Developmental and Reproductive Toxicity (DART) Testing”

in Konstanz, Germany



Universität  
Konstanz



Report in preparation





*"I cannot say whether things will get better if we change;  
what I can say is they must change if they are to get better."*  
Georg Christoph Lichtenberg (1742-1799)

*"Systems thinking is a discipline for seeing wholes. It is a  
framework for seeing interrelationships rather than things, for  
seeing 'patterns of change' rather than static 'snapshots'."*  
Peter M. Senge (1947-), MIT

**Food for Thought ...**

## 3S – Systematic, Systemic, and Systems Biology and Toxicology

Lena Smirnova<sup>1</sup>, Nicole Kleinstreuer<sup>2</sup>, Raffaella Corvi<sup>3</sup>, Andre Levchenko<sup>4</sup>, Suzanne C. Fitzpatrick<sup>5</sup>  
and Thomas Hartung<sup>1,6</sup>

**Too expensive**

**Only for individual  
chemicals**

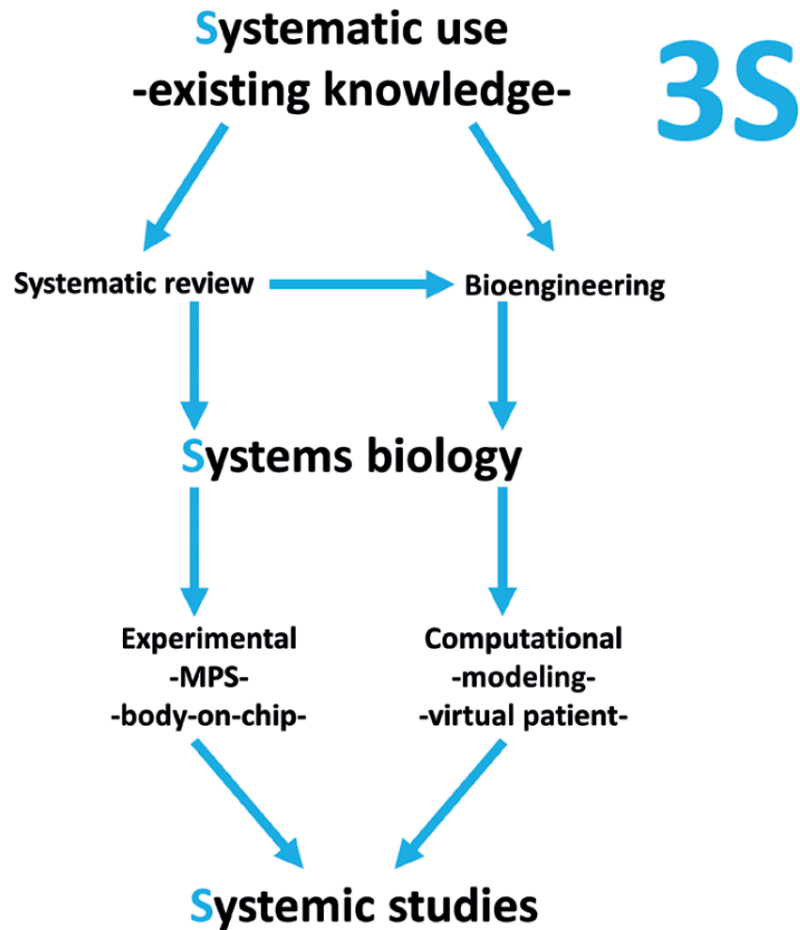


Fig. 1: The 3S approach to study systemic phenomena



**NOEL**

# **Threshold of Toxicological Concern (TTC)**

**Concept:**

- **No untested substance will be much more toxic than all (similar) tested ones**
- **Compare to dose of use scenario**

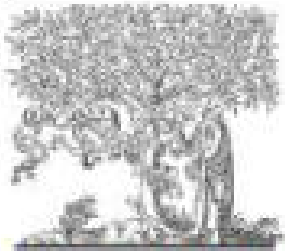
**Very pragmatic de-risking**

Food for Thought ...

# Thresholds of Toxicological Concern – Setting a Threshold for Testing below Which There Is Little Concern

Thomas Hartung

ALTEX 2017,  
34:331-351



ELSEVIER

Contents lists available at [ScienceDirect](#)

## Regulatory Toxicology and Pharmacology

journal homepage: [www.elsevier.com/locate/yrtph](http://www.elsevier.com/locate/yrtph)



### The Threshold of Toxicological Concern for prenatal developmental toxicity in rats and rabbits



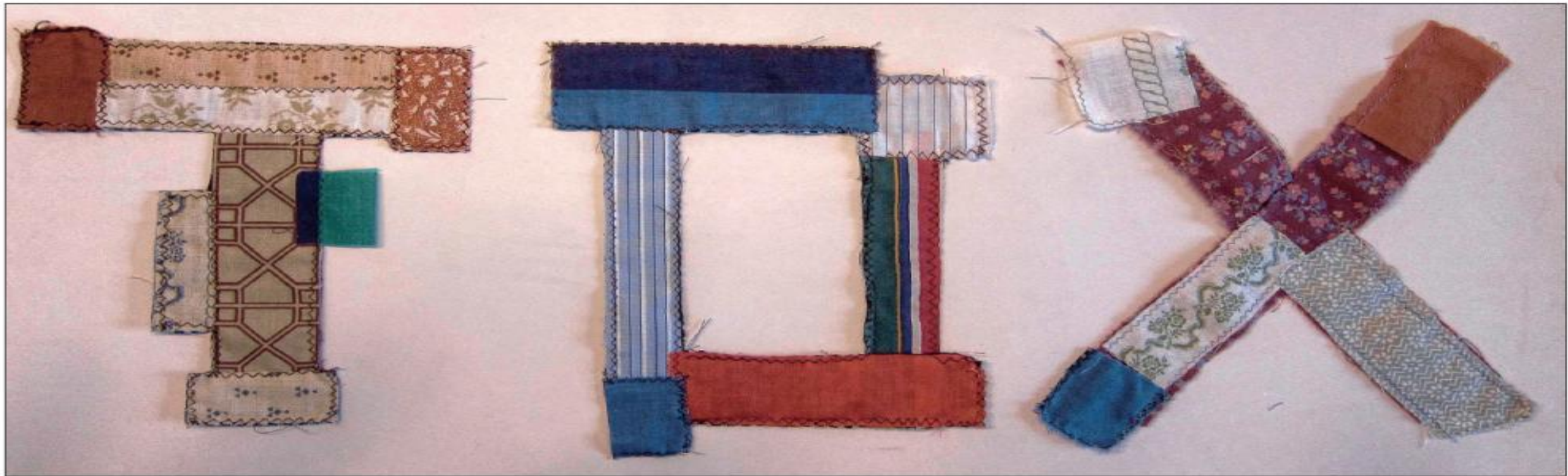
B. van Ravenzwaay <sup>a, \*</sup>, X. Jiang <sup>a</sup>, T. Luechtefeld <sup>b</sup>, T. Hartung <sup>b, c</sup>



# Food for Thought ... The Need for Strategic Development of Safety Sciences

*Francois Busquet<sup>1</sup> and Thomas Hartung<sup>1,2</sup>*

<sup>1</sup>Center for Alternatives to Animal Testing, CAAT-Europe, University of Konstanz, Konstanz, Germany; <sup>2</sup>Johns Hopkins Bloomberg School of Public Health, Center for Alternatives to Animal Testing, Baltimore, MD, USA



**Fig. 1: The patchwork building of toxicology**  
(courtesy of Ingrid Hartung, Solingen, Germany)

# 20<sup>th</sup> International Congress on *In Vitro* Toxicology (ESTIV2018)

*New approach methodologies for in vitro toxicology applications*

15-18 October 2018 • Berlin / Germany

CONGRESS DETAILS



- The European Society of Toxicology *In Vitro* (ESTIV)
- Gesellschaft für Toxikologie (GT, German Toxicology Society)
- Center for Alternatives to Animal Testing – Europe (CAAT-EU)



Prof. Mathieu  
Vinken  
ESTIV



Dr. Robert  
Landsiedel  
GT



Prof. Thomas  
Hartung  
CAAT-Europe

*The difficulty lies, not in the new ideas,  
but in escaping from the old ones.*

**John Maynard Keynes**

**(1883 - 1946)**