# Comments on the RoC Monograph on Cobalt and Certain Cobalt Compounds 

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on behalf of the Cobalt Development Institute

## Classifications based on NTP data

- 5 soluble inorganic cobalt salts* have a longstanding harmonized classification Carc. 1B (H350i) in the EU
- Cobalt metal has a global industry selfclassification Carc. 1B (H350i) since December 2013
- Hazard of carcinogenicity by inhalation is addressed for those cobalt substances with test data, plus 4 substances by read-across
*Test item $\mathrm{CoSO}_{4}$; classified by read-across $\mathrm{CoCl}_{2}, \mathrm{Co}\left(\mathrm{NO}_{3}\right)_{2}, \mathrm{CoCO}_{3}$,
Co di(acetate)


## 3 areas of comment

- Genotoxicity and cancer mode of action
- Grouping of cobalt substances
- Interpretation of non-portal of entry neoplasms


## Genotoxicity and cancer MoA

- Recent conclusion by OECD CoCAM* and by Kirkland et al\#:
- Based on new, guideline-compliant GLP testing
- "Poorly soluble cobalt compounds are not genotoxic.
- Soluble compounds do induce some DNA and chromosomal damage in vitro, probably due to reactive oxygen. The absence of chromosome damage in robust GLP studies in vivo suggests that effective protective processes are sufficient to prevent oxidative DNA damage in whole mammals.

Overall, there is no evidence of genetic toxicity with relevance for humans of cobalt substances and cobalt metal."

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## Non-genotoxic MoA proposed by CDI

Hours, day(s), weeks, months, 2 years

Presence of lung phagocytes throughout pathway to cancer


## Grouping of cobalt substances

- $1^{\text {st }}$ group: 5 inorganic soluble salts - soluble in pH neutral fluids
- $2^{\text {nd }}$ group: Co metal powder - poorly soluble at neutral pH , soluble in acidic fluids (lysosomes)
- $3^{\text {rd }}$ group: insoluble in neutral AND in acidic fluids $\left(\mathrm{Co}_{3} \mathrm{O}_{4}\right.$, inorganic pigments, other)
- Evidence for this from in vitro and in vivo data


## Co release in lysosomal fluid



## Distal-site neoplasms

- NTP considers these to be "treatment-related"
- No evidence that they are cobalt related
- A concordance of local rise in cobalt levels and dose-response relationship
- have been observed in the lung cancers
- have not been observed in the distal-site cancers


## Lung neoplasms, Co related

Co tissue levels in lung, compared with incidence of alveolar/bronchiolar carcinoma


## Distal-site neoplasms, treatment related

Co tissue levels in femur (+ bone marrow), compared with incidence of MCL


## In summary...

- Genotoxicity and cancer mode of action:
"No evidence of genetic toxicity with relevance for humans of cobalt substances and cobalt metal."

Evidence for inflammation as predominant element of the MoA

- Grouping of cobalt substances:
$3^{\text {rd }}$ group: insoluble at neutral and at low pH
- Interpretation of non-portal of entry neoplasms:

Treatment-related, not Co-related


[^0]:    * Cooperative Chemicals Assessment Meeting (October 2014); \# = accepted for publication in
    "Regulatory Toxicology and Pharmacology" (July 2015)

