



**ICCVAM Public Statement**  
**May 27, 2021**

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# Stemina's *In Vitro* Toxicology Assays

*Exposure-based prediction of toxicity potential using targeted metabolomics and human pluripotent stem cells and differentiated cells*



# devTOX<sup>qP</sup> Accurately Predicts Developmental Toxicity

- First paper published with EPA in 2011 on devTOX
- Extensive validation studies including 2020 Toxicological Sciences paper with EPA on 1,065 ToxCast Phase I and II compounds
- Predictive in a diverse chemical set
  - Pharmaceuticals, agrichemicals, cosmetics, industrial, and environmental chemicals
  - Data compared to published human and *in vivo* results
- Internal study of representative compounds from each category

Compound Set	N	Accuracy*	Sensitivity	Specificity	PPV	NPV
All	124	87%	88%	86%	88%	86%
Pharma	65	90%	87%	92%	94%	83%

\*Accuracy reported is balanced accuracy ( $\frac{Sensitivity+Specificity}{2}$ )

# Assay Developers Need a Clear Process for Validation of New Alternative Methods (NAMs)

- Provide specific and clear criteria about information needed for validation or qualification
- Provide a clear process, **with timeline**, for deliverables and validation decision
- Clear assessment of the accuracy and ability of the NAM to provide information for a specific context of use
- ICCVAM as the inter-agency committee is best positioned to provide a single process for qualification of alternatives
  - ICCVAM should provide a new and coordinated process for validation
  - NAM developers cannot afford to run a separate process for every agency and cannot afford to support a multi-year process with no defined timeline

# The Regulated Public Needs a Clear Context of Use for New Alternative Methods (NAMs)

- Provide specific and clear criteria about where and how validated NAMs should and could be used by the regulated public
- Provide case studies for context of use to provide guidance for use of NAMs in candidate compound regulatory approval
- Provide methods for incorporating NAMs in reducing, refining and replacing animals in toxicity testing
  - Examples include read-across and weight of evidence comparison and correlation of compound analog data in vivo with NAM risk assessment data for the candidate compound

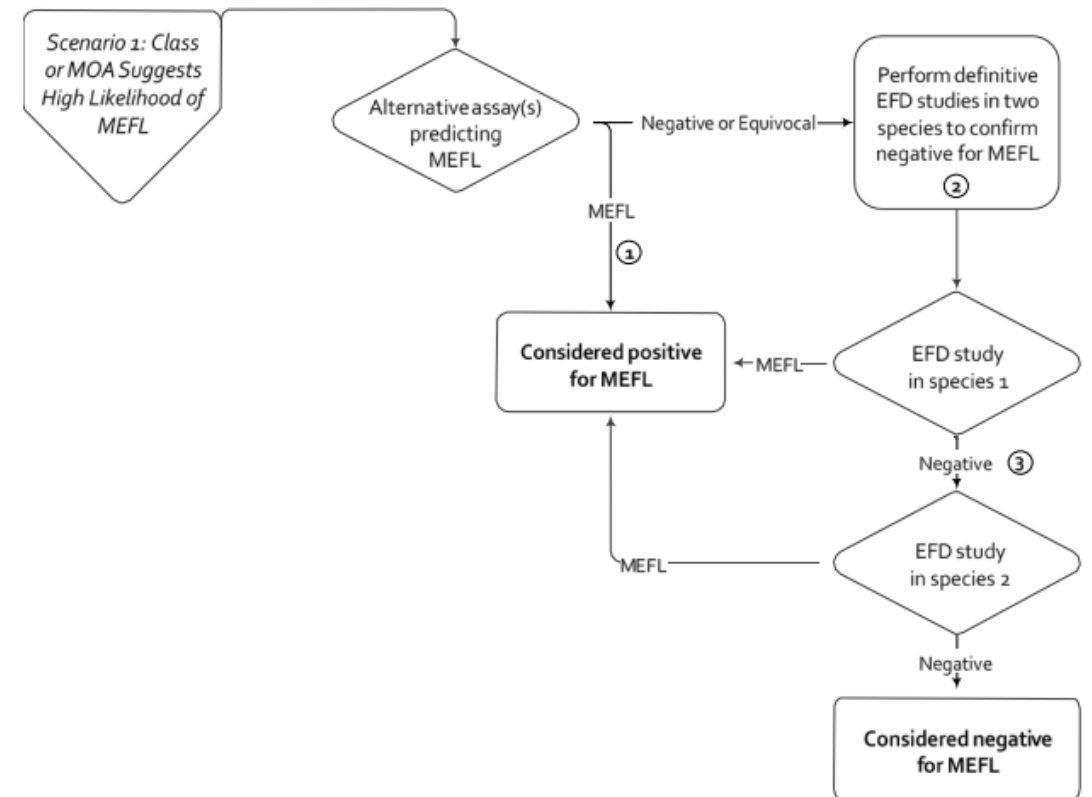
# New ICH S5(R3) Guidelines Support Use

## of Qualified Alternative Assays

### Let's Use Them to Harmonize Globally

- Guidance provides example scenarios where **qualified** alternative assays could be applied in place of/in conjunction with *in vivo* EFD studies.
  - Pharmaceuticals intended to treat severely debilitating/life-threatening diseases or late-life onset diseases
  - Pharmaceuticals expected to be embryo-fetal toxicants
    - **Stemina has submitted an LOI for the Biomarker Qualification Program for this scenario**

Figure 1: Use of Alternative Assays for Pharmaceuticals Expected to be EFD Toxicants



- 1) No additional assessment is warranted if unequivocal MEFL signal is observed at clinically relevant extrapolated exposures.
- 2) Alternatively, pEFD studies can be used; however, negative results should be confirmed by a definitive study in the relevant species
- 3) Conducting *in vivo* EFD studies in series, as shown, can permit reduction in animal use, as 2<sup>nd</sup> *in vivo* assay is not warranted if the first study is positive.



# Tox21 Success and the 3R's Require a Clear Validation Process

- devTOX is an example of a NAM that:
  - has been peer-reviewed and published 5 times in high profile journals in a decade from 2011 to 2021
  - Including two joint publications with EPA
- devTOX consistently outperforms the required in vivo tests
- devTOX is the only validated human system for assessing species specific response for developmental toxicity (e.g. potential for developmental toxicity in a human embryo)

***Yet devTOX has not had the opportunity to assist with the Tox21 objectives and the 3R's because there has not been a process to do so at any agency since the last ICCVAM submission in 2013!***

# Select Stemina Publications

Simms, L, et al. *Curr Res Toxicol.* (2020). [The use of human induced pluripotent stem cells to screen for developmental toxicity potential indicates reduced potential for non-combusted products, when compared to cigarettes.](#)

Palmer, JA, et al. *Toxicol Sci.* (2020). [A Targeted Metabolomics-Based Assay Using Human-Induced Pluripotent Stem Cell-Derived Cardiomyocytes Identifies Structural and Functional Cardiotoxicity.](#)

Zurlinden, TJ, et al. *Toxicol Sci.* (2020). [Profiling the ToxCast Library With a Pluripotent Human \(H9\) Stem Cell Line-Based Biomarker Assay for Developmental Toxicity.](#)

Palmer, JA, et al. *Reprod Toxicol.* (2017). [A human induced pluripotent stem cell-based in vitro assay predicts developmental toxicity through a retinoic acid receptor-mediated pathway for a series of related retinoid analogues.](#)

Zhu, H, et. al. *ALTEX.* (2016). [Supporting read-across using biological data.](#)

Palmer, JA, et. al. *Birth Defects Res B Dev Reprod Toxicol.* (2013). [Establishment and Assessment of a New Human Embryonic Stem Cell-Based Biomarker Assay for Developmental Toxicity Screening.](#)

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