

National Centre for the Replacement Refinement & Reduction of Animals in Research

Dose setting and considerations for the 3Rs

Dr Fiona Sewell, ERT Workshop on Kinetically Derived Maximum Dose Concept to Refine Risk Assessment

30 September 2020

Pioneering Better Science

Dose setting and 3Rs consideration team

```
Jeanne Domoradski – Corteva, US
```

```
Elaina Kenyon – EPA/ORD, US
```

- Lata Koshy HSE Chemicals Regulation Division, UK
- Liz Mendez EPA/OPP, US
- Moiz Mumtaz ATSDR, US
- Fiona Sewell NC3Rs, UK

Cecilia Tan – EPA/OPP



Problem formulation statement

Lack of clear agreement on how to evaluate available data and approaches to determine top dose for repeated dose animal studies. The goal being to design dose-response studies that are **relevant to human exposures** and supportive of 3Rs principles.

Guidance states toxicokinetics should be 'considered' but limited information as to how this should be done.



The 3Rs



Reduction

Replacement

Refinement

Why do things differently?

- Recognition that animals can be poor predictors of humans
- Potential to reduce uncertainty and increase relevance of safety assessments
- Development of robust strategies that exploit all knowledge currently available
- Address societal concerns related to the use of animals in toxicity testing
- Meet legislative requirements around the marketing of chemical products and work towards global harmonization
- Reduce time and cost associated with chemical safety assessment without compromising human safety

NC

3R^s

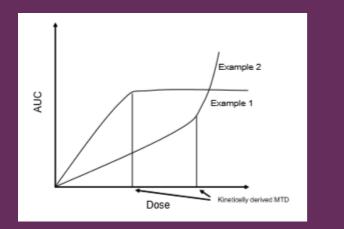
The 3Rs



	Standard	Contemporary
Reduction	Methods which minimise the number of animals used per experiment	Appropriately designed and analysed animal experiments that are robust and reproducible, and truly add to the knowledge base
Refinement	Methods which minimise animal suffering and improve welfare	Advancing animal welfare by exploiting the latest <i>in vivo</i> technologies and by improving understanding of the impact of welfare on scientific outcomes
Replacement	Methods which avoid or replace the use of animals	Accelerating the development and use of models and tools, based on the latest science and technologies, to address important scientific questions without the use of animals



Dose selection and the 3Rs

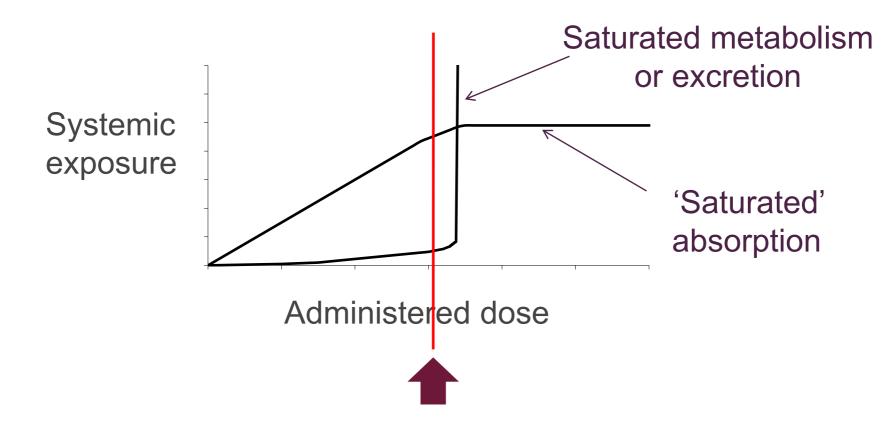




- 3Rs impact of inappropriate dose selection
- Top dose 'too high'
 - Unnecessary animal suffering
 - Study may need to be terminated or lose top dose group
 - Unreliable results e.g. due to 'biological stress' / metabolic shift
 - Data not relevant non-specific vs. chemical specific toxicity - may require further *in vivo* studies to explore MoAs occurring at doses far above realistic human exposures
- Top dose 'too low'
 - Repeat studies may be required to demonstrate toxicity additional animals used
- Critical to get the balance right and ensure the most scientifically appropriate doses are selected to add the most value

Dose Selection

NC 3R^s



- Doses above this generally exceed realistic dose scenarios
- Hazard finding related to biological stress occurring at high doses is not relevant to human exposures at much lower levels

Advice on use of TK for dose selection

- Advice on dose selection in OECD* Test Guidelines (TG 407, 408, 409, 451 and 453)
- 'Should' take into account any existing toxicity and TK data available

Additional information on specific OECD guidelines:

Study	Dose selection
OECD TG 409: 90 day non- rodents	 Non-rodent should only be used where TK studies indicate use of specific non-rodent species most relevant
OECD TG 451: 18 month carc	 Should be based on the results of shorter-term repeat dose or range finder Should consider TK and dose ranges where metabolic
OECD TG 453: 2 year chronic / carc	 induction, saturation, or non-linearity between external and internal doses occur. Should consider known or suspected non-linearities or inflection points in dose–response.



*Organisation for Economic Co-operation and Development

Regulatory guidelines: TK and dose setting

NC 3R^s

Regulation	Summary of requirements/ recommendations
OECD GD116 (2012)	Design and Conduct of Chronic Toxicity and Carcinogenicity Studies (TG 451, 452, 453) suggests that TK should be considered in setting top dose (linear vs. non-linear kinetics).
OECD GD151 EOGRTS	If info on TK processes is known, dose selection can be based on that info (e.g. highest dose does not exceed absorption or the setting of doses within and beyond linear metabolism).
REACH Chapter R.7c	Use TK to support dose setting decisions for repeated dose studies. TK data, especially info on ADME are highly useful. Dose level corresponding to the inflexion point can be regarded as the kinetically derived maximum dose. The highest dose-level should not exceed into the range of non-linear kinetics.
EC/1107/2009	TK required in short and long-term studies. Dose level selection should take into account TK data such as saturation of absorption.
US EPA OPP HEDGD #G2003.2	Recommends 'use of innovative approaches'. Highest dose tested should not be above a dose that results in saturation of absorption.
US EPA EPA/630/P- 03/001F:	TK should be considered to set top dose. High dose should not compromise study outcome through inducing inappropriate TK (e.g. overwhelming absorption, detoxification mechanisms). Overt toxicity or qualitatively altered TK due to excessively high dose may result in tumour effects that are secondary to the toxicity rather than directly attributable to the agent.

High dose selection: pros and cons of different approaches

	Pros	Cons
Limit dose	 Historically used 	 Arbitrary, not scientifically-driven
MTD	 Clearly identify adverse effects Simplifies hazard assessment 	 Unnecessary animal suffering Ambiguity around tox endpoints used to determine MTD Effects may not be related to realistic human exposure May trigger additional testing (e.g., mechanistic data for effects at non- human relevant doses)
KMD	 Considers multiple lines of evidence Human relevant exposures Avoids additional testing (e.g., MoA) at non-human relevant doses 	 May not be high enough for some jurisdictions (especially if no toxicity observed) May trigger additional testing



• Optimum approaches may differ in the context of fit-for-purpose

Misconceptions

Overt toxicity needs to be observed at top dose

- Repeat dose studies are intended to assess the effects of (realistic) repeated exposures over time - overt toxicity does not necessarily need to be demonstrated
- Different interpretations of adversity
- Loss of ability to maintain homeostasis (i.e. saturation of kinetic processes) demonstrates 'biological stress' and is thought to be equivalent to bodyweight loss limits typically used to determine MTD
- Limited value in increasing dose above saturation of absorption – increase in applied dose will not lead to increase in internal dose
- Limited value in demonstrating more than 'mild' toxicity, provided it is outside of expected human exposure



Misconceptions

Use of KMD to set top dose in chronic toxicity study requires more animal use than traditional MTD

- Some cases may require additional dose levels of PK studies to determine KMD – but often balanced by benefits in overall package
- Incorporation of TK helps increase the available information to allow more informed decisions on dose selection
- Generally same studies and same numbers of animals used whether MTD or KMD approach
- Microsampling allows integration of TK and avoids the need for satellite groups
- Reduced chance of generating irrelevant toxicity data that may require additional mechanistic studies to explain relevance to humans



Use of toxicokinetics to inform dose selection

- Integration of TK into all studies maximises information available for dose setting
- Studies are often conducted in a specific order, so that at each stage more information is available to inform dose selection
- Consequence of inappropriate dosing increases with study duration and sample size

ole	Repeat dose studies		DART	studies	
available		DRF study			ation, nals
data a		28 day study			er dur e anir
More d		90 day study	Probe dev tox	Probe repro study	Longer more
		2 year bioassay	Main dev tox	2-gen repro study	



Repeat dose studies – animal numbers

Study	Species	OECD	Spacias	Animal numbers		
Study	Species	TG	Species	Study design	Range	Typical
	Dog	-	Dog	2 / sex / 4 doses	8	8
28 day	Mouse	407	Mouse	5 / sex / 4 doses	40 - 60	50
	Rat	407	Rat	5 / sex / 4 doses	40 - 80	40
	Dog	409	Dog	4 / sex / 4 doses	32 - 48	32
90 day	Mouse	408	Mouse	10 / sex / 4 doses	80 - 100	80
	Rat	408	Rat	10 / sex / 4 doses	80 -100	80
18 month carc	Mouse	451	Mouse	50 / sex / 4 doses	>400	400
2 year chronic / carc	Rat	453	Rat	64 /sex / 4 doses	>512	656



Huge impact of getting the dosing 'wrong' – especially if leads to repeat and/or additional investigational studies

Examples of MoA studies

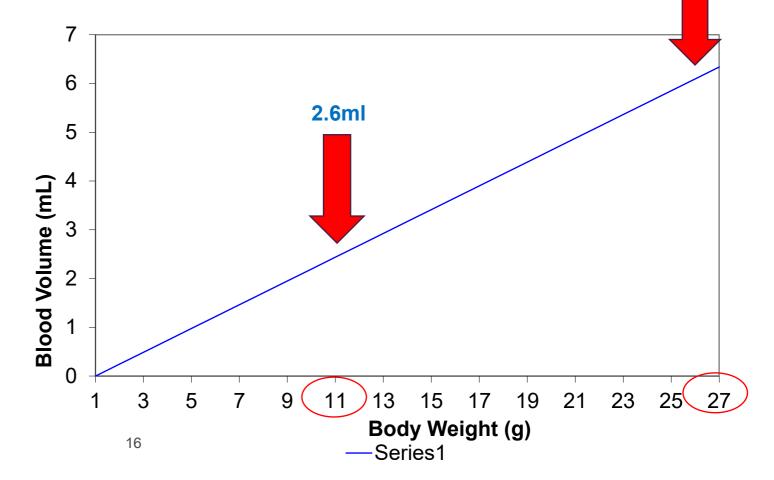
NC 3R^s

Supplemented with *in vitro* and *in silico* data (e.g. structure-activity relationships, SARs)

Study trigger / investigation	Study designs	Typical animal numbers used
Standard Liver MoA Liver tumours (in mouse and/or rat)	10 / single sex / 4 groups / 3 timepoints (days 1,7 & 28)	120 – 480
Standard Thyroid MOA Thyroid tumours (in mouse and/or rat)	15 / single sex / 4 groups / 3 timepoints (days 1,7 & 28)	180 – 720
To establish human (non) relevance for liver tumours, strain comparison for transfer to liver KO mouse study	4 / single sex / 5 groups (to assess PK linearity) / 2 timepoints (days 1 & 7 to account for limitation in mouse PK sampling) / 3 strains (e.g. CD1, KO WT & KO strains)	120 – 240
Liver KO mouse Study	10 / single sex / 4 groups / 2 timepoints (days 1 & 7) / 3 strains (e.g. CD1, KO WT & KO strains)	240 – 480

Integration of TK and blood sampling limits

- Up to 10% total blood volume taken on a single occasion from a normal, healthy animal.
- No more than 15% of circulating blood volume taken in a 28 day period.
- Scenario: to take 8 samples (~200 µl) at start and end of a toxicology study plus others for additional parameters (e.g. clin path) would require ~5.6 mL of blood – this is a rat weighing 650 g!
- Most rats weigh 250 g, with less blood!



5.6ml



How to reduce volume required per animal?

- Fewer timepoints
- But may not achieve scientific objectives of study



- More animals e.g. satellite group for TK
- Would enable sufficient conventional samples to build a TK profile
- But can increase the number of animals by over 40%
- OR

NC

- Microsampling
- 2 x 8 point profiles using 50 µl microsamples requires 0.8mL blood which represents around 5% of total blood volume





Reduction in animal use by using microsampling

Example: 90 day	rat study with	satellite animals
-----------------	----------------	-------------------

Dose group	Low	Medium	High	Control
Main study	10M+10F	10M+10F	10M+10F	10M+10F
TK satellite	6M+6F	6M+6F	6M+6F	3M+3F
Total for 1 study				122

Example: 90 day rat study with microsampling allowing smaller satellite groups

Dose group	Low	Medium	High	Control	
Main study	10M+10F	10M+10F	10M+10F	10M+10F	
TK satellite	3M+3F	3M+3F	3M+3F	3M+3F	18 fe
Total for 1 study				104	anim

Example study design: 90 day rat study with microsampling of main study animals

Dose group	Low	Medium	High	Control	
Main study	10M+10F	10M+10F	10M+10F	10M+10F	42 fewer
Total for 1 study				80	animals

Microsampling



Improves the science and reduces and refines animal use simultaneously 1. Scientific benefit:

- Comparison of data within the same animal at different time points – acts as own control and can track changes from baseline.
- Allows direct comparison of different datasets e.g. exposure data and toxicology in same animal.
- 2. Reduced stress:
 - quicker, reduced or no warming
 - reduced handling and stress
- 3. Less blood loss, allows serial samples from same animal*
- 4. Use fewer animals overall
- 5. Less test item needed, less housing space/husbandry financial savings

* Within limits of acceptable needle-stick punctures & animal burden



Common questions / concerns

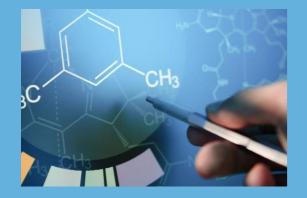


- Microsampling is being used for agrochemicals and CROs are reporting an increase in TK sampling in these toxicity studies
- LCMS-MS sensitivity has increased over past decade allows detection of low concentrations of analytes
- The European Bioanalysis Forum (EBF) have investigated and published recommendations / best practices to ensure scientific quality and reproducibility of microsamples



 Clinical pathology parameters and functional measurements similar to vehicle animals, when microsampling from main test adult and juvenile animals included – bibliography with evidence on NC3Rs website

Incorporation of nonanimal approaches



- Opportunities to integrate non-animal kinetic (*in vitro* or *in silico* data) and dynamic data to inform dose selection in repeated dose animal studies
- TK information can help inform IVIVE and ensure new approach methodologies (NAMs) use appropriate and relevant concentrations
- Allows more hypothesis/data-driven testing to be conducted
- Use of AOP-driven approaches to identify biomarkers for molecular initiating events to be tested in *in vitro* or early *in vivo* studies to avoid the need for future testing in animals, or testing at irrelevant high doses.



Summary

Use of TK offers opportunities to both improve science and benefit the 3Rs

- 3Rs consequence of inappropriate dose selection
- TK can provide information on dose exposure relationship to inform more appropriate dose selection (i.e. to reflect effect of the compound following repeat exposure - not the effect on a 'stressed system')
- Highest dose should ideally be within linear kinetics
- Benefits include more informative and scientifically refined dosing, and offers 3Rs benefits - reduced suffering to animals (and fewer animals overall)
- Need a better understanding of when the KMD approach may/may not be appropriate for regulatory (and other) purposes
- Need guidance on how to present and communicate the data to regulators so that it is acceptable – what do they need to see?



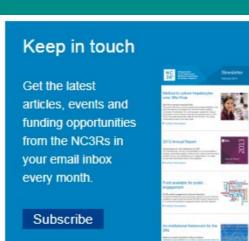
National Centre for the Replacement Refinement & Reduction of Animals in Research

Thank you!

For more information

fiona.sewell@nc3rs.org.uk
www.nc3rs.org.uk
www.facebook.com/NC3Rs
@NC3Rs

Pioneering Better Science





Check out our microsampling resources: www.nc3rs.org.uk/3rs-resources/blood-sampling