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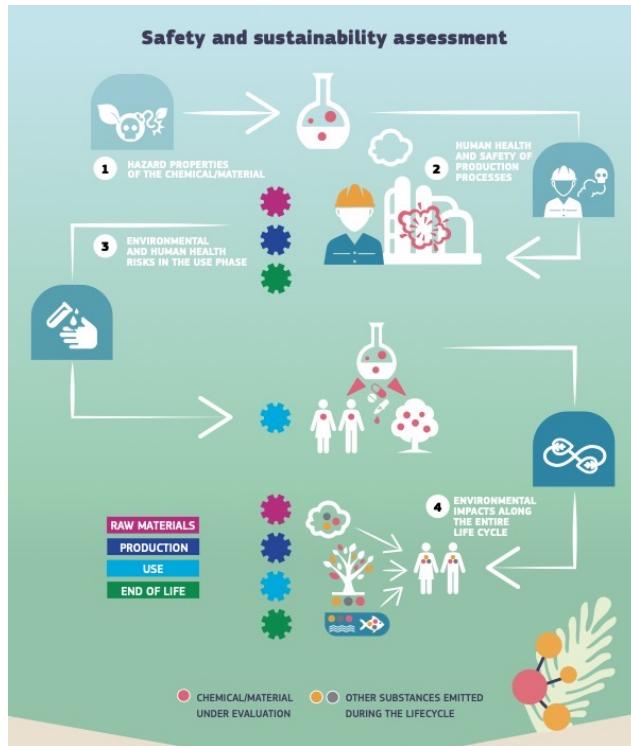
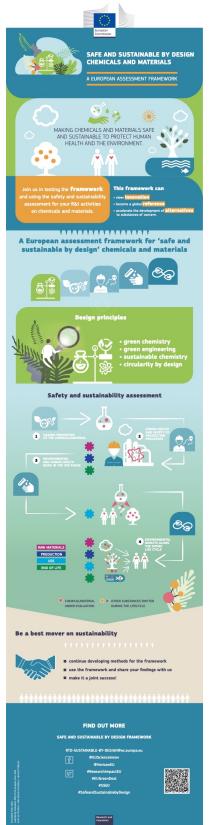
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# **Early-stage hazard assessment – What do we have and what should we aim for?**

Kathrin Fenner, Chemistry Department (University of Zurich) & Environmental Chemistry (Eawag)

## EC framework on “Safe-and-sustainable-by-design” (SSbD) (EC, 2022)



Infographic: <https://op.europa.eu/en/publication-detail/-/publication/11cd64f5-76a8-11ed-9887-01aa75ed71a1/language-en>

Hierarchical safety and sustainability assessment:

1. Hazard assessment of chemical or material
2. Human health & safety of production process
3. Hazards and risk of final application of chemical or material
4. Environmental impact throughout life-cycle of chemical or material

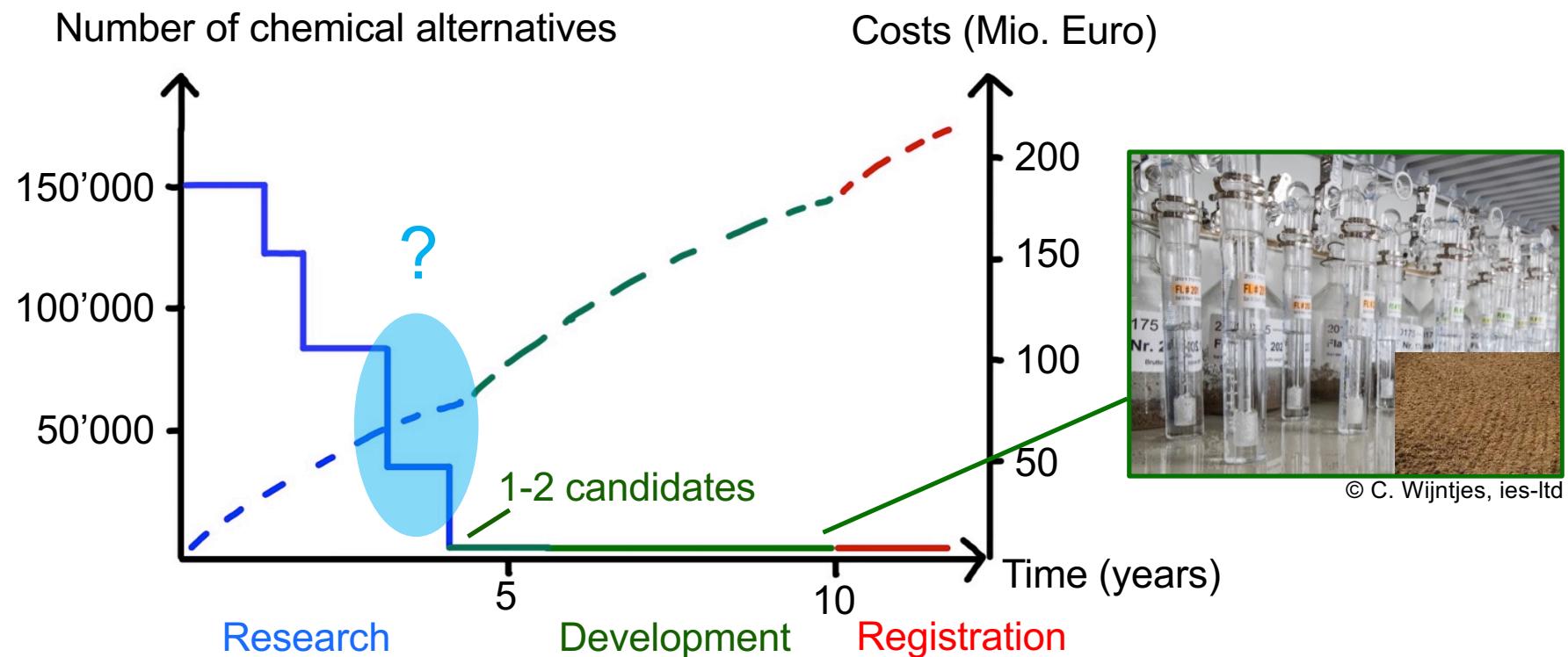


## Regulatory hazard criteria

- Cause-effect relationships difficult to establish for chemicals:
  - Complex relationships between presence of chemical and effects on human health and environment
  - Cause and effect can be far apart in space and time
- Need for application of Precautionary Principle:

“Full scientific certainty that a chemical (or chemical product) causes harm cannot be required to take action to prevent such harm” (*UNGA*, 1992), see also “Late lessons learned from early warning” (*EEA*, 2013) for chemical-related case studies
- Regulatory hazard criteria implement precautionary principle:
  - **PBT:** Persistent, bioaccumulative, toxic; **vPvB:** Very persistent and very bioaccumulative
  - **T** includes carcinogenic, mutagenic, toxic to reproduction (**CMR**), and endocrine disrupting chemicals (**EDC**) (*EC*, 2023)
  - **M:** Mobility, new hazard category under CLP (*EC*, 2023) → **PMT** and **vPvM**

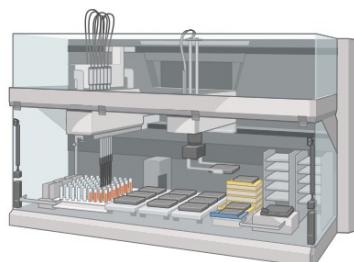
## Overview of R&D process for pesticides





## New approach methodologies (NAMs)

- Alternatives assessment and SSbD require new methods
  - High-throughput (fast, resource-efficient)
  - Animal-free
  - Applicable to many chemicals (“scalable”)
  - Robustly predictive of behavior in the environment (“standardizable”, “mechanistic”)



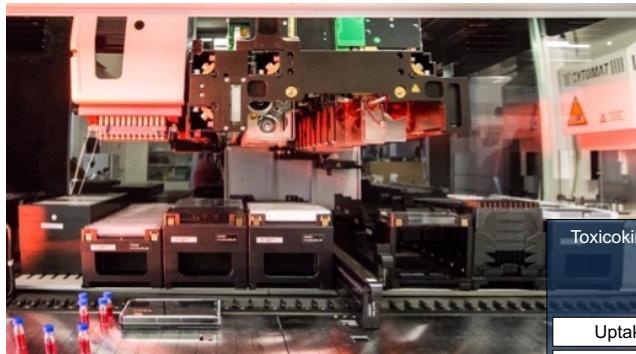
High-throughput assays (*in vitro*)



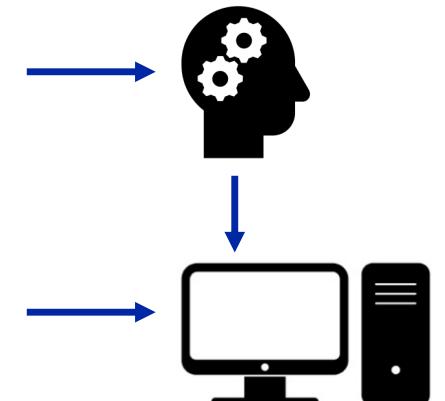
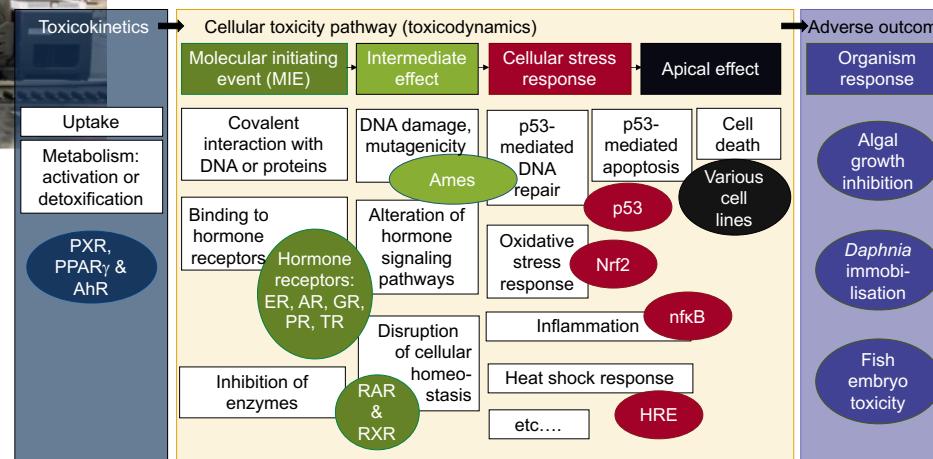
Computational, structure-based predictions (*in silico*)

## High-throughput testing in (eco-)toxicology (T)

Tox21 and ToxCast (U.S. EPA, NIH, FDA, NIEHS): > 10k substances tested on > 50 bioassays



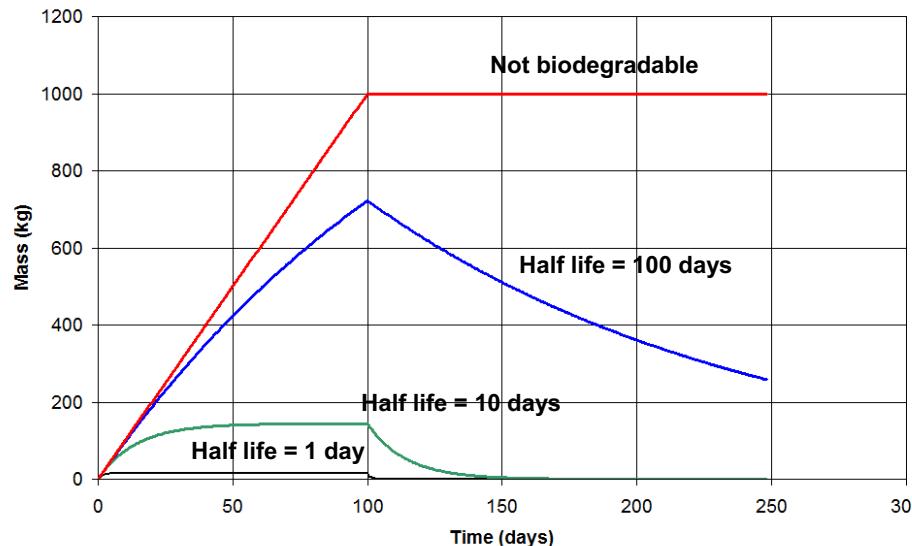
High-throughput assays  
(*in vitro*)



Computational, structure-based  
predictions (*in silico*)

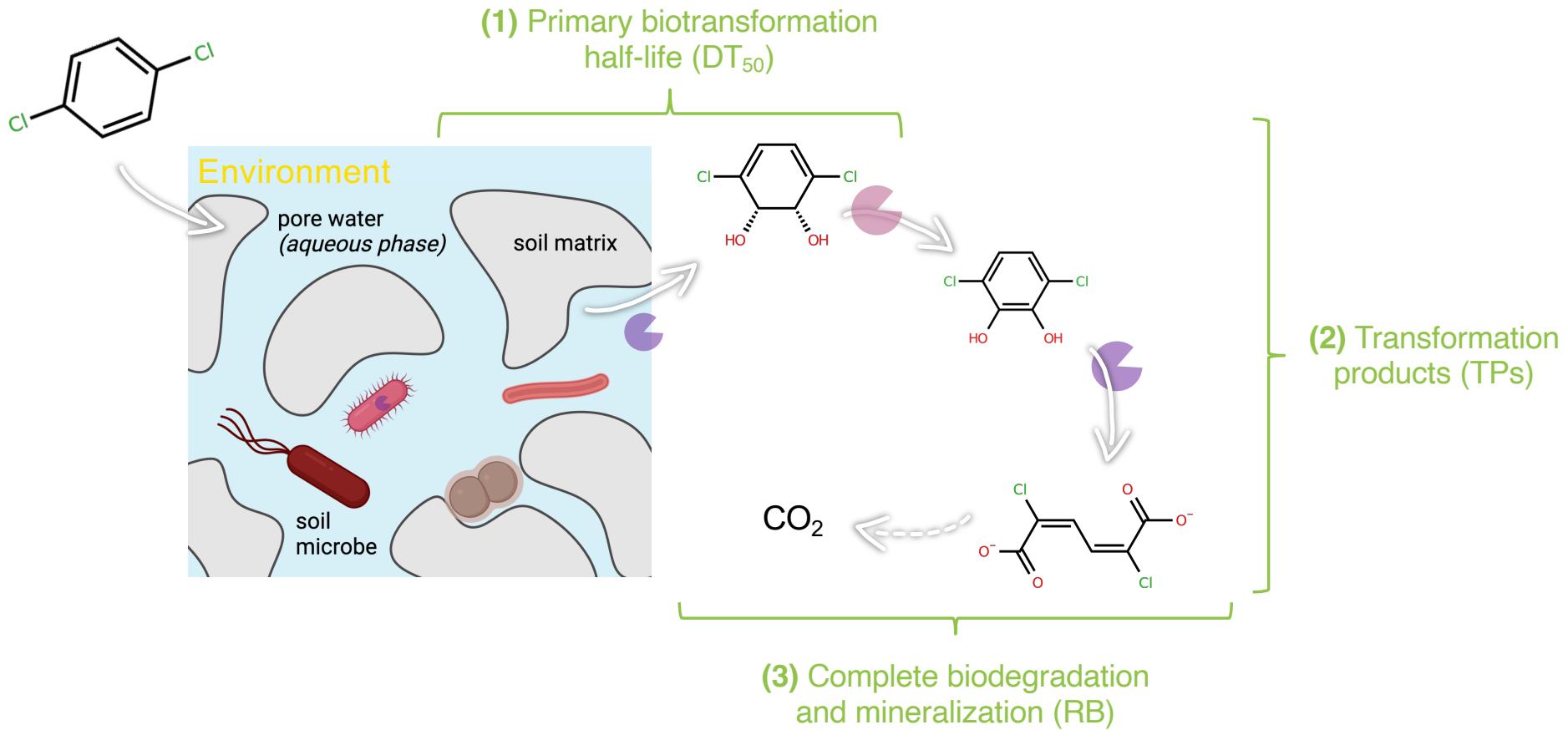
## Persistence (P)

- Persistence: “Propensity for a chemical to remain in the environment before being transformed by chemical and/or biological processes in a particular environment” (*Boethling et al., 2009*)



- P-sufficient approach (*Cousins et al., 2019*): High persistence alone should be established as a sufficient basis for regulation of a chemical

## Different flavours of P



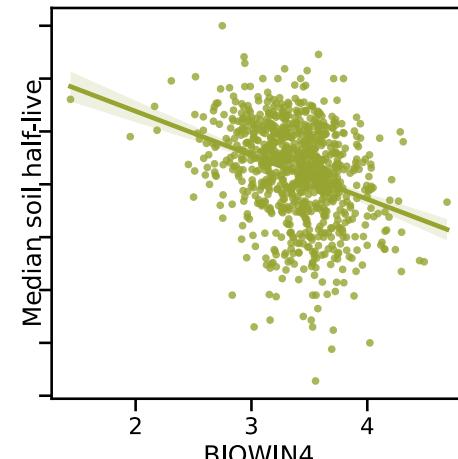


## *In silico* ready biodegradability prediction

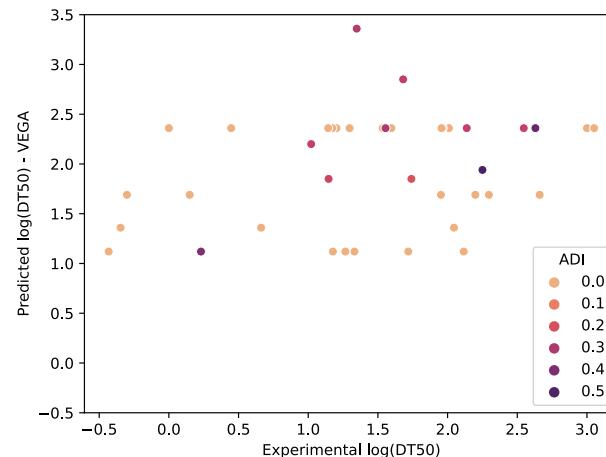
- Many freely available and commercial software tools available
- Mostly classification models
- Typical accuracy: approx. 80+%
- Largest training data set currently used: >6000 chemicals, >12000 data points (*Huang and Zhang, 2022*)
- Take home:
  - Ready biodegradability reasonably well predictable
  - Models applicable to wide range of chemicals (e.g., reasonable predictions for >98% of > 850,000 environmentally relevant chemicals in the DSST database (*Huang and Zhang, 2022*))

## In silico half-life predictions

- Very few models predict half-lives, e.g.,
  - OPERA from US EPA (only for hydrocarbons)
  - BIOWIN, using extrapolation factors
  - VEGA (*Lombardo et al., 2022*)
    - Semi-quantitative models trained on data for soil, sediment, water (approx. 180 chemicals for each endpoint) (data mostly from Gouin et al. (2004))
    - R2: 0.75 - 0.82 on validation sets (20%); RMSE (log t1/2): 0.34 - 0.36
- Take home:
  - Half-life prediction very challenging
  - Data sets currently too small



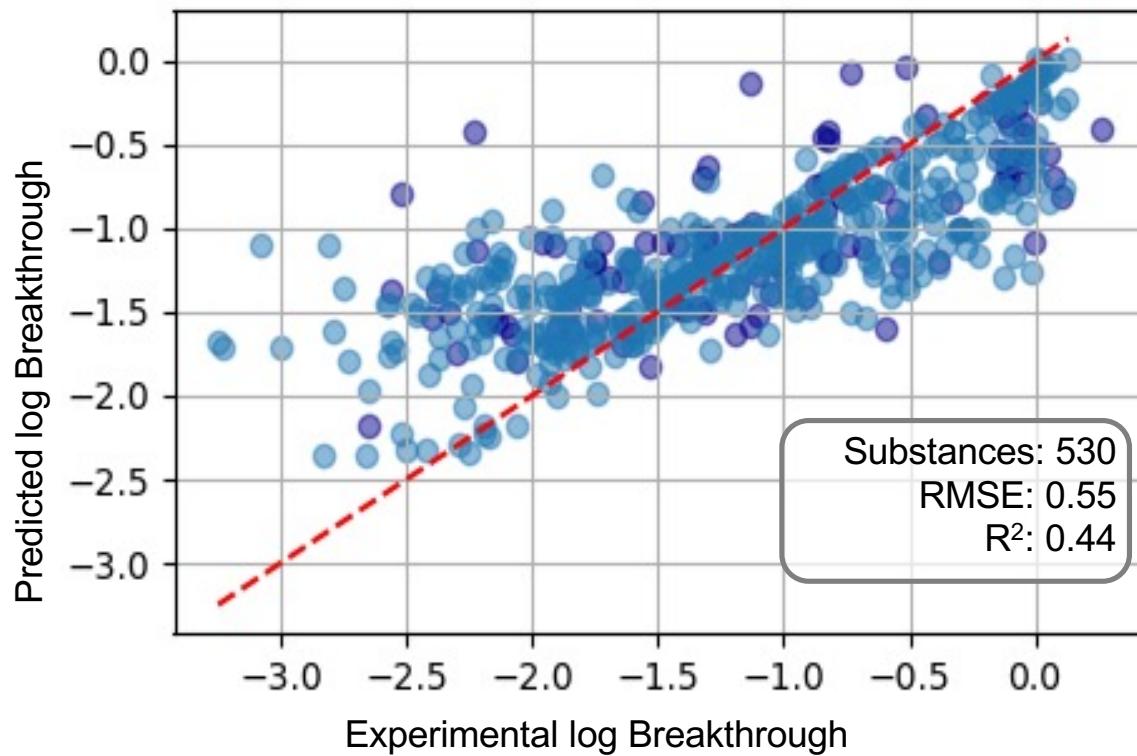
**BIOWIN**  
predictions of  
OECD 307 DT50  
values  
n=895 (pesticides)



**VEGA**  
predictions of  
OECD 309  
DT50 values  
n=39 (APIs)  
R2: -0.35  
RMSE: 1.07



## Recent own *in silico* work – Predicting biodegradation in WWTPs



Machine learning model: Random Forest regressor and MACCS fingerprints



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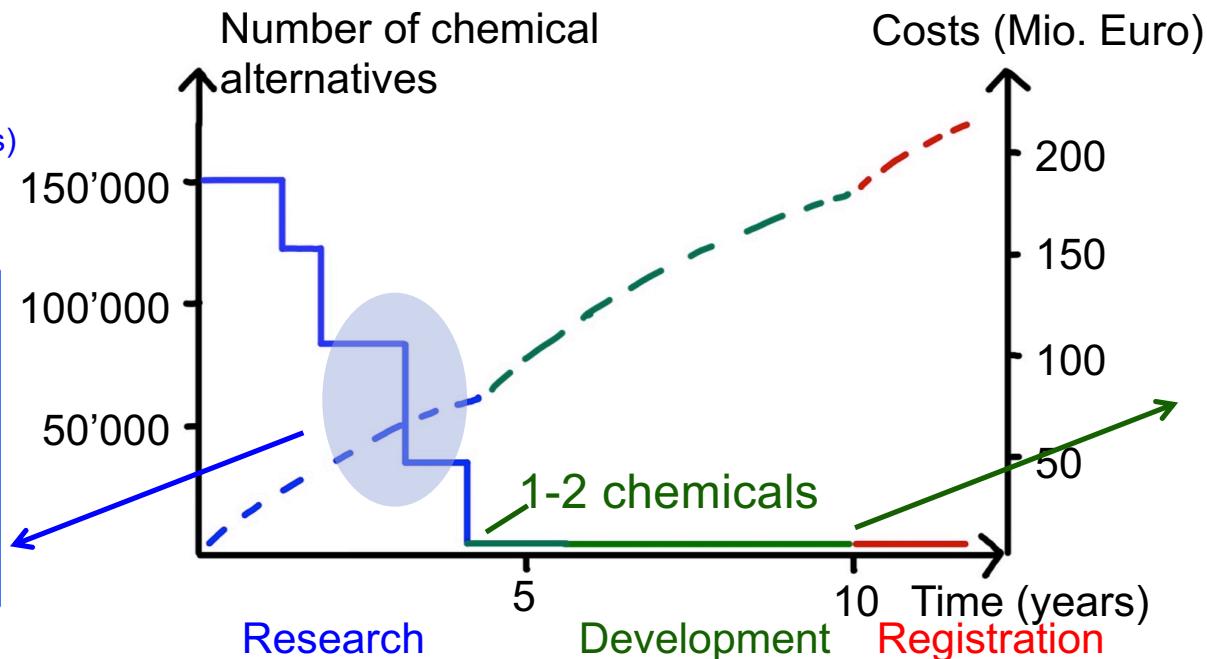
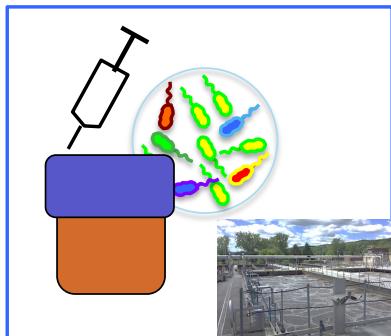


## High-throughput assays for ready biodegradability

- *Martin et al., ES&T, 2017:*
  - 96 well-plates, filled with activated sludge, 28 days
  - Colorimetric read-out through reaction of phenol-containing compounds with diazonium salts
  - Probability of biodegradation across dilution series
- *Brillet et al., ESPR, 2016:*
  - 24 well-plates monitored with non-invasive O<sub>2</sub> probe filled with activated sludge, 28 days
  - Inocula with fresh/sea water, soils, activated sludge; different T & cell density
  - Probability of degradation across >800 conditions/inocula
  - Under further development with different read-out (personal communication)

## Activated sludge as in vitro assay for P screening? – Read-across approach

- Activated sludge studies:**
- Short duration (2-3 days)
  - Mix of multiple substances



**Soil simulation studies  
according to OECD 307:**

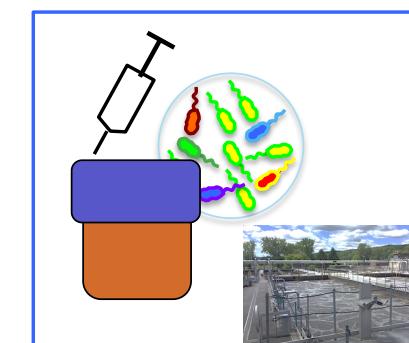
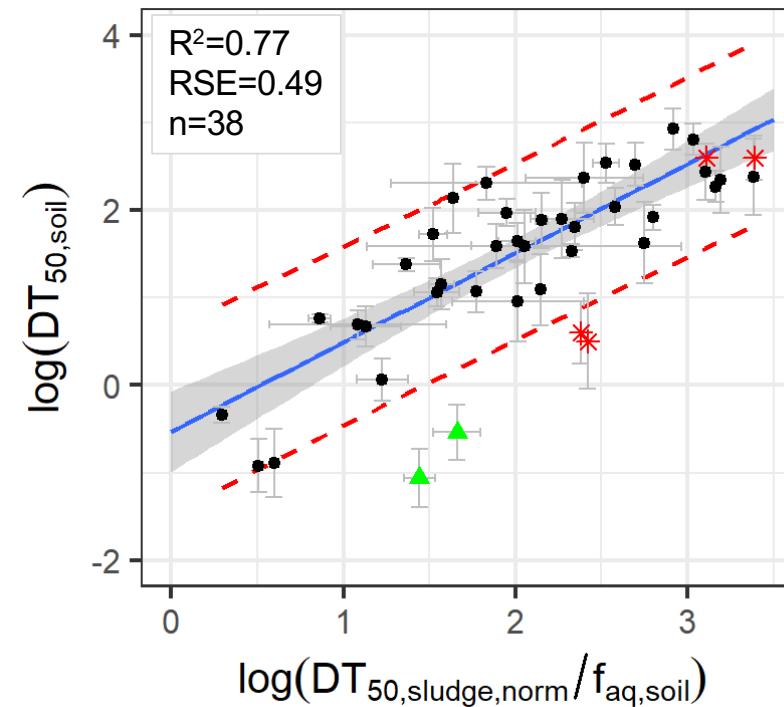
- Long duration (> 60 days)
- Radioactively labelled chemicals



## Activated sludge as in vitro assay for P screening? – Read-across approach



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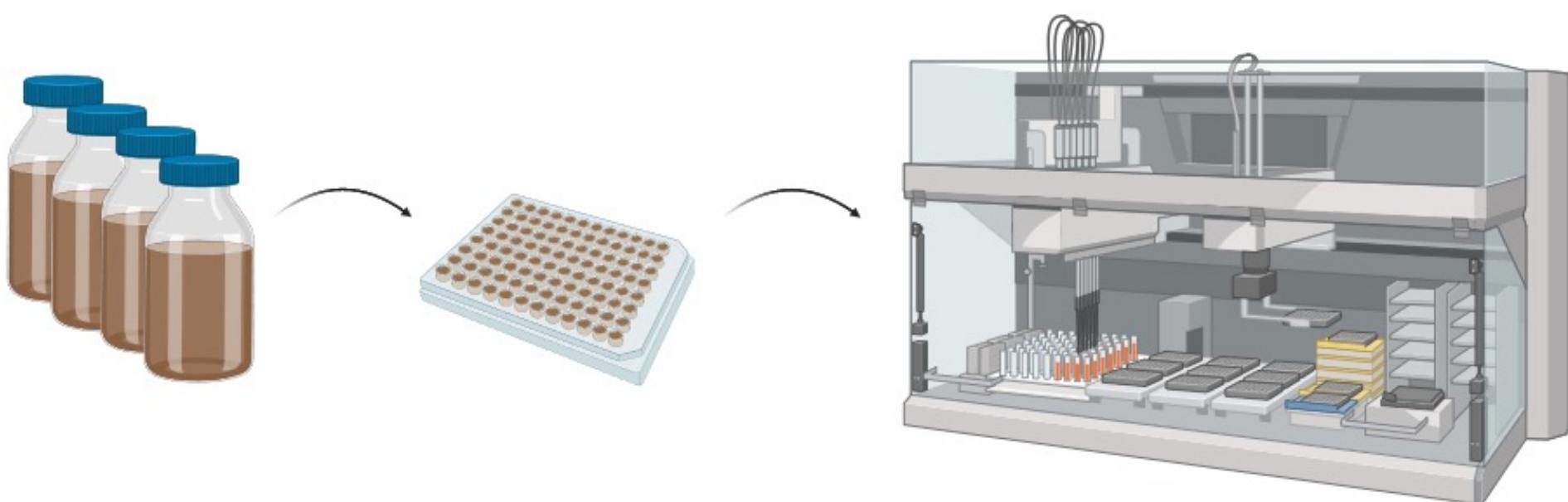




## Towards automating P screening

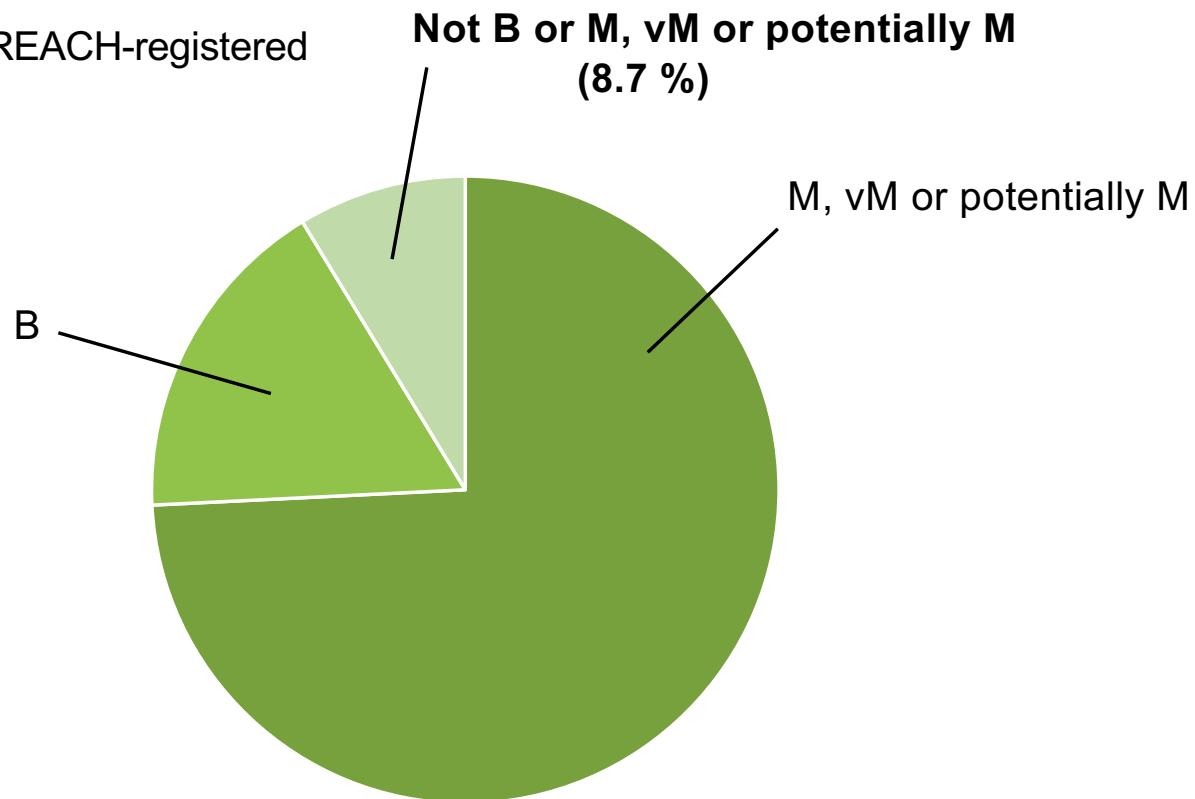


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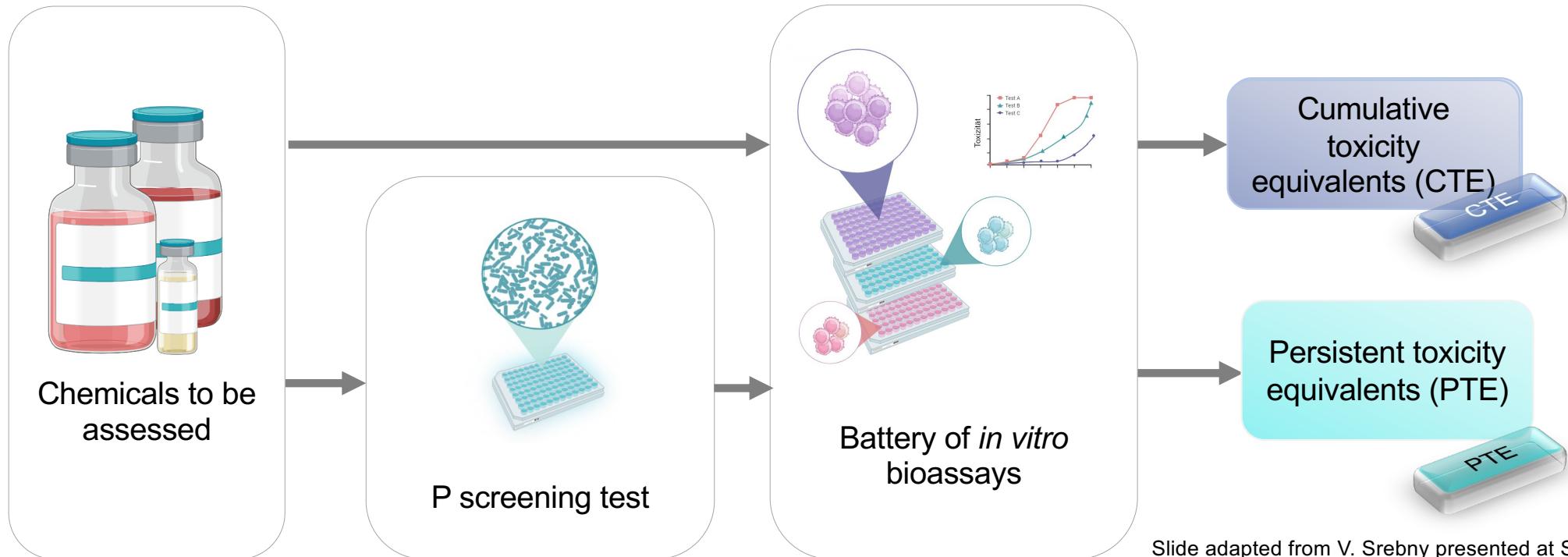


## What about B and M?

- E.g., 13,405 unique REACH-registered



## The CTE/PTE concept for hazard assessment



Slide adapted from V. Srebny presented at SynCom Workshop "Zwei Neue Indikatoren für die Gefahrenbewertung in der EU-Chemikalien Politik" (Dec 2023)



## Early-stage hazard assessment – What do we have and what should we aim for?

- Efficient (new) methods for alternatives assessment and “benign-by-design” dearly needed
- Automation of *in vitro* assays currently most promising
  - More data also basis for developing better models
- Suggestion to reduce hazard assessment to key hazards: P and T (CTE/PTE concept)
  - Method development ongoing
  - Amongst others: PARC case study on BPA replacements (Escher, UFZ)
- Applicability of methods to materials??



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## Acknowledgments

### PhD students and Postdocs:

Sarah Partanen  
Claudia Coll  
José Cordero  
Jasmin Hafner  
Carolin Seller  
Martina Kalt  
Kunyang Zhang  
Yaochun Yu  
Werner Desante  
Anastasia Athanasakoglou  
Stefan Achermann  
Cresten Mansfeldt

### Collaborators:

Beate Escher, UFZ Leipzig  
Ecolmpact Team, Eawag  
Michael McLachlan, Stockholm University  
Michael Zimmermann, EMBL  
Jörg Drewes, TUM  
Barth Smets, DTU  
Larry Wackett, University of Minnesota  
Claudio Screpanti, Syngenta  
Heinz Singer, Eawag  
Serina Robinson, Eawag  
Jürg Hutter & Hiroko Satoh, UZH  
Jakob Pernthaler, UZH  
Emanuel Schmid, SIS



European Research Council  
Established by the European Commission



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
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Bundesamt für Umwelt BAFU





## Key references

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