



## Chemical risk assessment based on in vitro and human biomonitoring data: A case study on thyroid toxicants

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1 **Chemical risk assessment based on *in vitro* and human biomonitoring data: A**  
2 **case study on thyroid toxicants**

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16 **Keywords:** Risk assessment, *in vitro*, human biomonitoring, thyroid toxicity, environmental  
17 chemicals, PFOS

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20 **Abstract**

21 Today detailed risk assessment can only be performed for a few percent of the total number of current-use  
22 chemicals due to lack of data. Toxicity data is therefore needed for a substantial number of untested  
23 chemicals, a task that requires improved and faster chemical risk assessment strategies that are cost-efficient,  
24 human relevant and ethically responsible. In this commentary we use a case study on five known thyroid  
25 toxic chemicals (perfluorooctanesulfonic acid (PFOS), triclosan, tetrabromobisphenol A (TBBPA),  
26 decabromodiphenyl ether (BDE-209), and hexabromocyclododecane (HBCD)) to explore the use of *in vitro*  
27 data for hazard assessment together with human biomonitoring (HBM) data for exposure assessment when  
28 evaluating human risk. Based on the case study we conclude that *in vitro* and HBM data can be used for risk  
29 ranking of chemicals. We envision that an *in vitro*/HBM approach can use data from studies such as the big  
30 European initiative HBM4EU together with human relevant *in vitro* data to make alternative risk assessment  
31 more valuable to finally be able to ‘stand-alone’.

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## 41        **1. Changing the paradigm for chemical risk assessment**

42        Today we only have adequate information to perform detailed risk assessment for a few percent of the total  
43        number of current-use chemicals [1]. This reflects a considerable data gap, which is a bottleneck for  
44        prediction of human health effects caused by exposure to chemicals. We therefore need to gather or predict  
45        more toxicity and exposure data for a substantial number of untested chemicals, a task that – for many  
46        reasons – should not be solved by use of traditional animal-based methods only. Hence, improved and faster  
47        chemical risk assessment strategies are required to evaluate individual chemicals for which we need  
48        knowledge on human safety [2,3]. Here we propose a framework on how to risk rank chemicals based on *in*  
49        *vitro* data and human biomonitoring data (Fig. 1).

### 51        ***1.1 The current paradigm and challenges***

52        Chemical hazard characterization is traditionally based on experimental animal data - often rodent data - for  
53        various organ toxicities, reproductive toxicity, carcinogenic effects and mutagenic effects [4]. While such  
54        data can be of great value there are several challenges, which complicates chemical risk assessments based  
55        solely on this information:

- 56        • A scientific challenge exists, as rodent studies do not always predict human responses. Comparison  
57        of human and rodent toxicity data for 150 pharmaceuticals showed that rodents predicted 43% of  
58        human responses [5].
- 59        • A practical challenge exists, as *in vivo* data is lacking for the majority of the industrial chemicals in  
60        current use [6].
- 61        • An ethical challenge exists, as based on the 3R principles [7], reductions on the use of animals for  
62        experimental toxicity studies should be made due to ethical reasons. This has resulted in political and

63 public pressure as well as EU legislation for test of cosmetics [8] where some *in vitro* approaches  
64 already exist.

65 Human exposure assessment of a specific chemical is often based on data derived separately for various  
66 relevant sources. For instance, exposure via food is often derived from data on chemical concentrations in  
67 various food items and average data for human food intake patterns, whereas exposure to the same chemical  
68 via cosmetics is assessed separately. Assessing aggregate exposures is thus a challenge [9,10] and still large  
69 data gaps exists on human exposure to chemicals [11]. Human internal exposure assessed via human  
70 biomonitoring (HBM) is a measure of aggregated exposure but are not routinely used in chemical risk  
71 assessment [12]. Yet HBM data is increasingly being gathered all over Europe (HBM4EU [13]) and US  
72 (NHANES [14]), presenting a great opportunity to evaluate human exposure across sources.

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## 74 ***1.2 Towards a paradigm shift***

75 A decade ago, the United States National Research Council presented a vision for chemical toxicity testing  
76 in the 21<sup>st</sup> century, in which computational biology and *in vitro* tests based on human biology play a central  
77 role [3]. Following this, high-throughput screening (HTS) programs such as ToxCast and Tox21 [2,15,16]  
78 were initiated. Such HTS systems, together with computational biology and “omics methods”, have  
79 generated data on hazard for large numbers of chemicals in a cost-efficient, human relevant and ethical way  
80 [2,17]. Several studies have been published on the use of HTS data in reverse dosimetry models for  
81 estimation of human exposure and ranking of chemicals [18–21]. In these studies, external intake dose was  
82 used as the measure of exposure, whereas we in the present study explore the use of HBM data as the  
83 measure of internal exposure. We argue that *in vitro* data for hazard assessment together with HBM data for  
84 exposure assessment has a future potential to accommodate some of the scientific, practical and ethical  
85 challenges we are presently facing. Our long-term vision is that the use of defined panels of *in vitro* tests  
86 combined with human HBM data for the chemical(s) in question can contribute significantly to chemical

87 regulation. For the purpose of this publication we present a case study with well-known thyroid toxic  
88 chemicals.

## 89 **2. Case study on thyroid toxicants**

### 90 **2.1 Methodology**

91 We decided to focus on chemicals that disturb thyroid hormone levels as this is an emerging endocrine  
92 mechanism of action for which new *in vitro* testing strategies are being developed. Our exercise was  
93 hypothesized to highlight data gaps that might require future attention. Seventeen compounds were selected  
94 for investigation based on their known thyroid toxic effect *in vivo* and relevant human exposure [12]. Out of  
95 these seventeen, five were selected as model compounds based on relevance and available literature on *in*  
96 *vitro* and HBM data; perfluorooctanesulfonic acid (PFOS), triclosan, tetrabromobisphenol A (TBBPA),  
97 decabromodiphenyl ether (BDE-209), and hexabromocyclododecane (HBCD). A literature search was  
98 conducted to extract HBM data (NHANES [22] and PubMed) and thyroid relevant *in vitro* data (PubMed  
99 and ToxCast database [23]). For comparison we also included animal *in vivo* studies from which NOAELs  
100 for thyroid effects were derived. To enable comparison across HBM, *in vitro* and *in vivo* studies, chemical  
101 concentrations in human and animal blood was transformed to nM. The methodology is described in detail in  
102 the Supplementary material, but in short: chemical blood levels from epidemiological and *in vivo* studies  
103 were re-calculated from the unit g chemical/ g lipid or g chemical/ g wet weight of blood to nM. For triclosan  
104 the calculation of human internal concentrations differed, as triclosan has a short half-life and is usually  
105 measured in urine. Blood levels were therefore estimated by calculation of daily intake based on  
106 concentrations found in urine [24] and hereafter a simplified one-compartment toxicokinetic model was  
107 applied [25].

108 Risk characterization ratios (RCRs) were calculated for each chemical by division of the exposure estimate  
109 based on HBM data with a reference value (RV) based on *in vitro* data ( $RCR = \text{exposure}/RV$ ) [26]. The RCR  
110 value reflects whether exposures exceed the concentrations considered “safe”. Thus, RCR values >1 indicate  
111 that human exposure levels may be associated with a potential risk. RVs were based on *in vitro* data from  
112 one experimental study for each chemical that was selected based on expert judgement in terms of relevance

113 of the mechanism of action and reliability of the study. . From the five selected *in vitro* studies, the ‘no  
114 observed effect concentration’ (NOEC) value was used for RCR calculation. For chemicals with no reported  
115 NOEC an extrapolation factor of 10 from LOEC to NOEC was used. Furthermore, we included studies in  
116 zebrafish larvae for PFOS, TBBPA, and BDE-209, even though the larvae is not considered an *in vitro*  
117 model, only the embryo is [27]. Studies considered to be potential outliers or not showing a mechanism  
118 known to be thyroid specific, were excluded.

119 The *in vitro* studies included are presented in Table 1. The data shows a wide field of tested *in vitro* end  
120 points with indications of effects on well-known thyroid endpoints such as antagonism of the thyroid  
121 receptor (TR) [28] and transthyretin (TTR) binding [29] by PFOS, activation of the constitutive androstane  
122 receptor (CAR) by a triclosan metabolite [30], TTR binding by TBBPA [31], TH reduction of BDE-209 in  
123 zebrafish [32–34], as well as some thyroid-specific effect in hepatocytes by HBCD [35].

124 To take uncertainty of HBM data into account the exposure values were calculated based on an average of  
125 means (PFOS, triclosan, TBBPA) or medians (BDE-209, HBCD). Exposure data with values below limit of  
126 quantification/limit of detection, measurements in other matrices than blood or urine, studies from Asian  
127 countries and occupational exposure studies, were excluded.

128

## 129 **2.2 Data availability**

130 Data on exposure and toxicity collected from HBM, *in vitro* and *in vivo* studies for the five chemicals are  
131 depicted in Fig. 2 and the references used are shown in Table 1.

132 Due to limited resources, the HBM data included for PFOS and triclosan were limited to one representative  
133 European study and data from the NHANES [22]. For TBBPA, BDE-209, and HBCD a thorough review of  
134 the literature was conducted. For TBBPA, three HBM studies were included and several excluded due to  
135 several studies with TBBPA levels below limit of quantification/limit of detection. For BDE-209, some  
136 studies were also excluded due to measurements below the limit of detection/limit of quantification.  
137 Exclusion of these data may somewhat skew the results, leading to an overestimation of the exposure for  
138 these compounds.

139 The included *in vitro* studies have tested thyroid toxicity for a wide range of endpoints (Table 1), but not all  
140 chemicals have been tested for all relevant mechanisms of thyroid toxicity. This approach, which includes a  
141 range of assays, is analogous to classical risk assessment where several endpoints are evaluated and only the  
142 most sensitive endpoint is used in the end.

143

### 144 **2.3 Output and ranking**

145 Ranking of the five compounds in terms of calculated RCR values based on *in vitro* NOEC values showed  
146 that PFOS was associated with the highest risk (RCR = 8) and HBCD with the lowest (RCR=0.0001) (Table  
147 2):

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<i>PFOS</i> >> <i>TBBPA</i> > <i>BDE-209</i> > <i>Triclosan</i> > <i>HBCD</i>
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151 Based on this analysis, exposure to PFOS alone is highlighted as a potential human health risk. The  
152 association is of even greater concern considering that humans are exposed to several perfluorinated  
153 compounds [36] that may have the same or similar mode(s) of action, which can cause cumulative effects.  
154 The RCR ranking shows that PFOS needs further attention, although its use is restricted within the US [37]  
155 and EU [38].

156 It should be noted, however, that the RCR values are subject to great uncertainties, both for the hazard and  
157 exposure data. The RCR values presented here should therefore be regarded as indicative values suggested as  
158 examples in this proposed framework, and not as values that should readily be used for risk assessment  
159 purposes.

160 As can be seen in Fig. 2 the *in vitro* active concentrations and the blood levels at LOAELs and/or NOAELs  
161 from animal experiments were not that different. However, for PFOS effects are seen at lower concentrations  
162 *in vitro* than *in vivo*, whereas for triclosan the situation is opposite. This reflects that toxicity of some  
163 perfluorinated chemicals generally seem to be underestimated by animal studies [39] and that human data  
164 and physiologically-based kinetic modelling are needed for a proper risk assessment of this group of  
165 chemicals. For triclosan the difference may be explained by species differences in CYP induction [40]. In



166 humans and rodents, increased liver catabolism of thyroid hormones has been identified as one of the  
167 primary modes of action of triclosan [40,41]. However, data from nuclear receptor reporter assays show that  
168 CAR and PXR activation by triclosan differs between the human and rodent [40], which indicates important  
169 species differences in thyroid hormone catabolism.

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### 172 **3. Future application of *in vitro* and biomonitoring data for risk assessment**

#### 173 **3.1 A panel of human-based *in vitro* assays**

174 We found limited relevant *in vitro* data and data that covers thyroid toxic mode(s) of action and/or key  
175 initiating events for the selected chemicals. Furthermore, there is a need for more human-based *in vitro*  
176 models as we in this case study only found a few assays based on human biology.

177 We suggest that defined panels of human-based *in vitro* assays are used to ensure that several important  
178 modes of action are covered, which is in line with the vision from the US National Research Council [3]. A  
179 defined panel of human-based *in vitro* assays would enable comparison and ranking of chemicals with  
180 different potencies, either by use of RCR values or a similar ratio. In terms of the practical challenge with  
181 thousands of untested chemicals on the market, *in vitro* assays enable high throughput test strategies such as  
182 the ToxCast and Tox21 initiatives in the US [2,15,16].

183 Toxicity is in some cases caused by metabolites and not the parent compound. The metabolic capacity of the  
184 *in vitro* system is therefore important to consider [42] and there are both extra- and intracellular options that  
185 can allow evaluation of metabolic capacity in the *in vitro* panel [43–45]. Furthermore, in order to obtain a  
186 quantitative link between HBM data and *in vitro* outputs - thereby improving predictions - it would be  
187 relevant to correct the *in vitro* output for factors such as protein binding, evaporation, binding to test  
188 plates/tubes/pipettes etc. in order to obtain the true intracellular concentration [46,47].

189

#### 190 **3.2 HBM data for exposure assessment**

191 Use of HBM data for exposure assessment is a promising approach as it measures the sum of chemical  
192 contributions from one or more routes of exposure as well as from different sources [48]. HBM data is also  
193 valuable for assessment of chemicals with unknown or poorly characterized exposure pathways [49] and thus  
194 the integrated internal exposure levels can be used as a better and more relevant measure [50]. Furthermore,  
195 external exposure modelling, based on e.g. food consumption patterns and cosmetics use, is likely a greater  
196 source of uncertainty than biological measurements [50,51]. On the other hand, HBM data cannot be  
197 obtained for all compounds due to e.g. shared metabolites, and an important drawback is that it can only be  
198 used for chemicals already on the market [48]. Evaluation of exposure based on HBM data will therefore  
199 always be a retrospective rather than preventive approach. Furthermore, HBM data does not contribute with  
200 information concerning timing and source of the exposure [48,52], which is central to chemical regulation.

201

### 202 ***3.3 Other examples of in vitro or HBM based risk assessment***

203 There are other examples of *in vitro* based risk assessment in the literature, however, many of these differ  
204 from the present approach by use of external exposure dose (oral intake, mg/kg) [18–21,53], whereas we  
205 have used internal exposure dose (blood concentration, nM) based on measured HBM data. Two examples  
206 are Campell et al. [53] and Ring et al. [18]:

207 Campbell et al. [53], used *in vitro* based EC<sub>10</sub> values for estrogenic activity of parabens as surrogate “safe  
208 exposure doses”. They used a Margin of Safety approach for risk assessment, which in essence is similar to  
209 our approach, except that the inverse ratio was calculated, i.e. division of a no-effect level with an exposure  
210 estimate.

211 Ring et al. [18] used data from ToxCast high-throughput *in vitro* screening assays applied for prioritization.  
212 Bioactive *in vitro* concentrations were extrapolated to oral equivalent doses by reverse dosimetry, and these  
213 doses were compared to external exposure doses calculated from HBM data. If the estimated exposure is  
214 higher than the dose needed to obtain a bioactive concentration in blood, a potential risk is identified.  
215 Interestingly, in that study triclosan was identified as one of the compounds with the smallest difference  
216 between exposure and activity, i.e. as the most problematic and a priority for further evaluation [18].

217 HBM data have been applied in studies where their potential as exposure estimates has been investigated. A  
218 comprehensive case study on benzene has been conducted [54], however, approaches more similar to the one  
219 used in the present case study has been conducted by Hays et al. [51] and Aylward & Hays [50]. In both  
220 these studies the authors concluded that internal dose measures from HBM studies are less uncertain than  
221 estimated external doses in risk assessment.

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## 224 **4. Conclusion**

225 We used a case study on five thyroid toxic compounds with differential mechanistic profiles to investigate  
226 the potential use of human biomonitoring (HBM) together with *in vitro* data for informing human risk  
227 assessment. We conclude that calculation of risk characterization ratios based on HBM and *in vitro* data is a  
228 helpful tool for ranking chemicals and for designing follow-up studies.

229 The case study highlighted the pros and cons of informing the risk assessment process with *in vitro* and  
230 HBM data and demonstrated that such data can be used for risk ranking of chemicals. Moreover, this  
231 approach may be used for pinpointing chemicals for which species differences may play a major role,  
232 thereby stressing the importance of basing the risk assessment on human-relevant data. Our vision is that an  
233 *in vitro*/HBM approach can use the HBM4EU project - in parallel to the NHANES project in the US -  
234 together with more comprehensive human relevant *in vitro* data to make 'alternative' risk assessment much  
235 more valuable to finally be able to 'stand-alone'.

236

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239 by the Ministry of Environment and Food of Denmark.

240 **Conflict of interest**

241 Declarations of interest: None.

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258 **Table 1:** Case study literature overview for the five selected chemicals PFOS, triclosan, TBBPA, BDE-209 and HBCD. The first row shows the human biomonitoring (HBM) data with  
 259 country of origin and references. The second row shows the *in vitro* data with endpoints measured, LOEC/EC<sub>x</sub> values, the study used for calculation of risk characterization ratio (RCR)  
 260 marked in bold, as well as references. The third row shows the *in vivo* data from animal experiments with endpoints and references.

	<b>PFOS</b>	<b>Triclosan</b>	<b>TBBPA</b>	<b>BDE-209</b>	<b>HBCD</b>
<b>HBM data</b> (country of origin)	US [22] Denmark [36]	US [22] Denmark [55]	France [56,57] Belgium [58]	US [59,60] UK [61–63] Greece [64] Spain [63,65–68] Netherlands [63] Germany [69] Denmark [70,71] Sweden [72–74] Norway [63]	Canada [75] Australia [76] Greece [64] Netherlands [77] Belgium [49,78] Germany [69] Sweden [79,80] Norway [81]
<b><i>In vitro</i> data</b> (endpoints ranked according to potency. The study used for RCR calculation in bold)	<b>Antagonism of TR LOEC 100 nM</b> [28] Competitive binding to TTR <b>IC<sub>50</sub> 130 nM</b> [29] T4 reduction and changed gene expression in zebrafish embryos <b>LOEC 200 nM</b> [82], <b>LOEC 200 nM</b> [83], <b>LOEC 400 nM</b> [84] Binding to TR $\alpha$ -LBD <b>IC<sub>50</sub> 16000 nM</b> [85] Inhibition of iodide uptake in hNIS assay <b>LOEC 17000 nM</b> [86]	<b>Metabolite activated CAR EC<sub>50</sub> 900 nM</b> [30], <b>EC<sub>50</sub> 9800 nM</b> [40] Inhibition of sulfotransferase <b>IC<sub>50</sub> 1410 nM</b> [87] Decreased NIS in FRTL-5 cells <b>LOEC 10000 nM</b> [88] Reduced activity of iodotyrosine deiodinase <b>LOEC 60000 nM</b> [89] TPO inhibition <b>LOEC 253 000 nM</b> [90]	<b>TTR binding IC<sub>50</sub> 31 nM</b> [31], <b>IC<sub>50</sub> 3070 nM</b> [91] Gene expression in zebra fish embryos <b>LOEC 184 nM</b> [92], <b>LOEC 202 nM</b> [93] Gene expression in zebra fish liver cells <b>LOEC 400 nM</b> [94] Growth hormone production in GH3 rat pituitary cells <b>LOEC 1000 nM</b> [95,96] Inhibition of rat disulfide isomerase <b>IC<sub>50</sub> 1180 nM</b> [97] TR antagonism and TR-related effects <b>LOEC 1000 nM</b> [98], <b>LOEC 3000 nM</b> [99], <b>IC<sub>50</sub> 4600 nM</b> [100], <b>LOEC 10000 nM</b> [101], <b>IC<sub>50</sub> 29500 nM</b> [102] TR $\alpha$ transcriptional regulation <b>IC<sub>75</sub> 24000 nM</b> [103] T-screen <b>LOEC 10000 nM</b> [104] Translocation of TR $\beta$ <b>LOEC 25000 nM</b> [105] Cell cycle regulation in human thyroid cells <b>LOEC 75000 nM</b> [106]	<b>TH reduction, gene and protein expression in zebra fish embryos LOEC 83 nM</b> [32], <b>LOEC 83 nM</b> [33] <b>LOEC 104 nM</b> [34] PXR activation <b>LOEC 100000 nM</b> [107]	<b>Effects on TH-inducible hepatic protein and TTR in chicken embryonic hepatocytes LOEC 1000 nM</b> [35] <i>Ex vivo Xenopus laevis</i> tadpole tail tip length regression <b>LOEC 1000 nM</b> [108] Increased TR-mediated gene expression <b>LOEC 3120 nM</b> [109] TTR binding <b>IC<sub>50</sub> 12000 nM</b> [31] T-screen <b>LOEC 21000 nM</b> [31]
<b><i>In vivo</i> animal data</b> (endpoints)	Reduced T4 levels in monkeys at estimated blood concentrations of <b>26.000 nM (NOAEL)</b> and <b>76.000 nM (LOAEL)</b> [110,111]	Reduced T4 levels in rats at estimated blood concentrations of <b>21 nM (NOAEL)</b> and <b>214 nM (LOAEL)</b> [112,113]	Reduced thyroid hormone levels in rats at blood levels estimated to <b>919 nM (NOAEL)</b> [114,115]	Reduced T4 in male rodents at blood levels estimated to <b>4800 nM (BMDL)</b> [116–118]	Reduced T4 in female rats with a NOAEL of 200 $\mu$ g/g lipid in liver [119]. According to Szabo et al. [120] HBCD blood levels are approximately 33% of the hepatic adipose tissue levels after 10 days of exposure in mice. Based on this the blood level was estimated to <b>395 nM (NOAEL)</b>

261 **Table 2:** Human biomonitoring (HBM) data, *in vitro* data and calculated risk characterization ratios (RCRs) for the five chemicals  
 262 (RCR = exposure (HBM data) /reference value (*in vitro*)).  
 263

Data type	PFOS	Triclosan	TBBPA	BDE-209	HBCD
<b>Human biomonitoring data</b> <i>Mean (nM)</i>	25	0.04	0.2	0.05	0.01
<b><i>In vitro</i> data</b> <i>NOEC (nM)</i>	3	90	3.1	8.3	100
<b>Risk Characterization Ratio</b>	8	0.0004	0.06	0.006	0.0001

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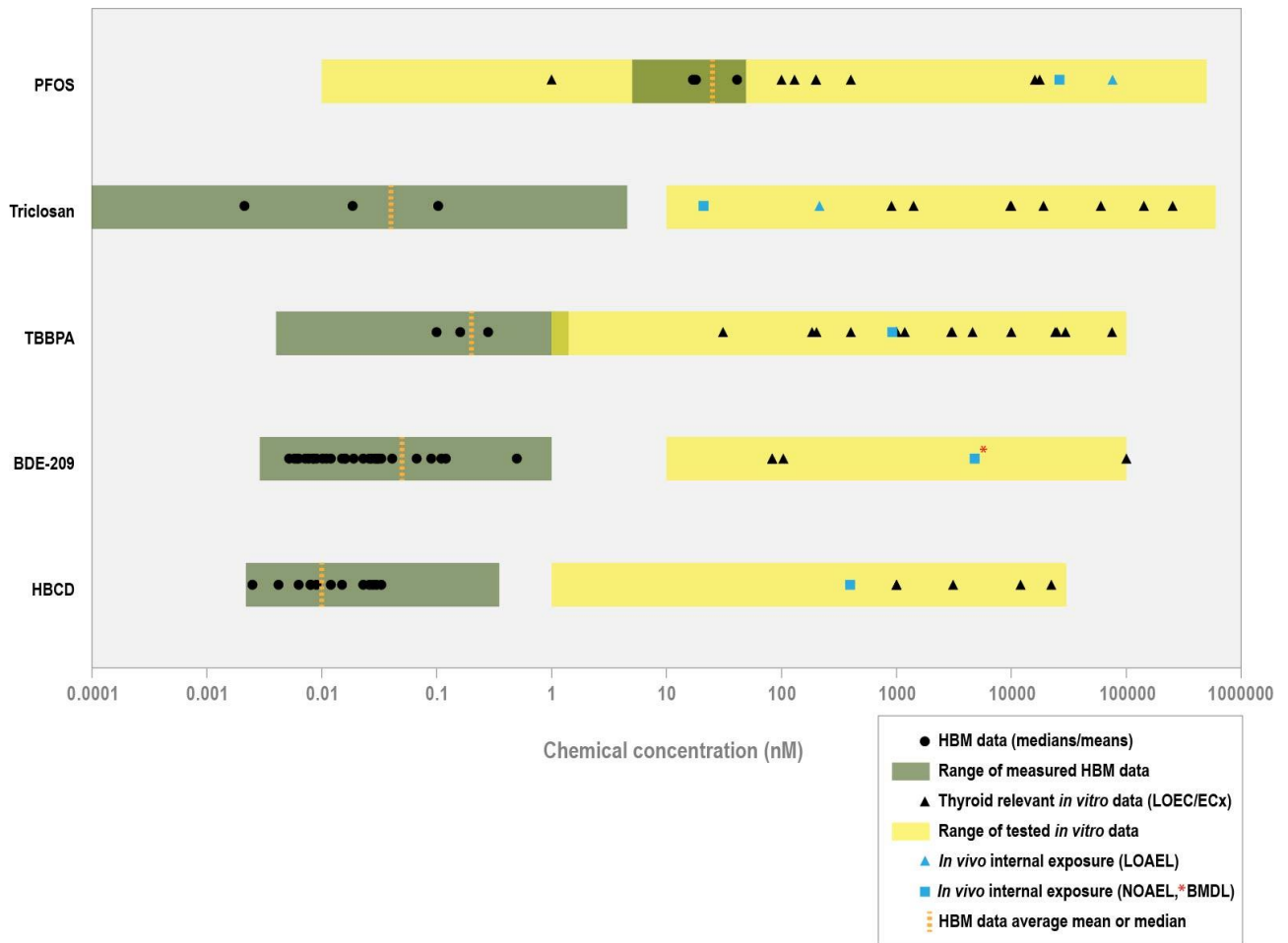
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**Figure 1 .** HBM data (green bars and dots), *in vitro* data (yellow bars and triangles), and *in vivo* data from animal experiments (blue triangles and squares) are depicted in this figure. The measured chemical levels in humans are generally lower than the effect concentrations found *in vitro* and *in vivo*. The exception is PFOS where the measured human levels and the effective concentrations *in vitro* are relatively close. Furthermore, average HBM values (orange, stippled lines) are relatively similar for all five chemicals except PFOS, where the internal human concentrations are higher.

(*LOEC* = lowest observed effect concentration; *ECx* = Effect Concentration at X percent of effect; *LOAEL* = lowest observed adverse effect level, *NOAEL* = no observed adverse effect level; *BMDL* = bench mark dose level)

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