NTP Performance of the GHS Mixtures Equation for Predicting Acute Oral Toxicity

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Introduction

- The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is used internationally for hazard classification.
- The GHS Mixtures Equation provides a mathematical approach to calculating toxicity of mixtures. considering the toxicity of each mixture component in a weighted manner.
- To evaluate the utility of this approach, we compared LD₅₀s predicted for formulations based on the Mixtures Equation to those determined from in vivo results with the complete formulation. Comparisons were made using both the U.S. Environmental Protection Agency (EPA) and GHS classification systems.
- LD₅₀s based on in vivo results and calculated using the Mixtures Equation for the same substances were collected by EPA from studies submitted for pesticide registration and provided to the National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM).
- We calculated concordance by determining the percentage of formulations for which classifications derived from in vivo data agreed with classifications derived from Mixtures Equation calculations.

Conclusions and Future Directions

- Most "discordant" substances had in vivo LD₅₀ values measured between 2000 and 5000 mg/kg or a limit test LD_{50} >2000 mg/kg.
- When considering formulations with LD_{50} >500 mg/kg together, overall concordance increased from 55% to 82%.
- Within-class concordance for less toxic substances was consistently over 85% regardless of classification system.
- Animal tests are inherently variable. Similar underprediction could also be observed following a repetition of the animal test.
- The GHS Mixtures Equation represents an alternative approach to reduce animal testing for formulations, particularly for substances predicted to have low or negligible acute oral toxicity.

Primary Analysis

Concordance analysis was determined according to EPA and GHS classification systems

| <i>In vivo</i> Classification | | | | | |
|----------------------------------|---|----|-----|-----|-----------------------------|
| | I | II | 111 | IV | Within-class Concordance |
| I | 3 | 1 | 0 | 0 | 75% |
| II | 4 | 30 | 61 | 20 | 26% |
| III | 1 | 34 | 197 | 163 | 50% |
| IV | 0 | 1 | 19 | 137 | 87% |
| Total | 8 | 66 | 277 | 320 | 55% |

| <i>In vivo</i> Classification | | GHS Add | Within-class Concordance | | | |
|----------------------------------|---|---------|-----------------------------|-----|------|-----|
| | 1 | 2 | 3 | 4 | 5/NC | |
| 1 | 0 | 0 | 0 | 0 | 0 | NA |
| 2 | 0 | 3 | 1 | 0 | 0 | 75% |
| 3 | 0 | 4 | 10 | 26 | 10 | 20% |
| 4 | 0 | 0 | 17 | 134 | 85 | 57% |
| 5/NC | 0 | 1 | 4 | 39 | 337 | 88% |
| Total | 0 | 8 | 32 | 199 | 432 | 72% |

EPA Categories GHS Categories (≤ 50 mg/kg) 1 ($\leq 5 \text{ mg/kg}$) II (>50 \leq 500 mg/kg) 2 (>5 \leq 50 mg/kg) $3 (>50 \le 300 \text{ mg/kg})$ **OSHA** III (>500 \leq 5000 mg/kg) Packing 4 (>300 ≤ 2000 mg/kg) IV (>5000 mg/kg) Hazard Hazard Group NC (> 2000 mg/kg) **EPA Category Signal Word** Statement $I(LD_{50} \leq 50 \text{ mg/kg})$ Danger/Poison Fatal if swallowed. II $(50>LD_{50} \ge 500 \text{ mg/kg})$ Warning May be fatal if swallowed. III (500>LD₅₀ \ge 5000 mg/kg) Harmful if swallowed. Caution No statement is required. May use $IV (LD_{50} > 5000 mg/kg)$ Caution (optional) Category III statement **Revised March 2018** Label Review Manual **Chapter 7: Precautionary Statements** https://www.epa.gov/sites/production/files/2018-04/documents/chap-07-mar-2018.pdf

Classification and Precautionary Labeling

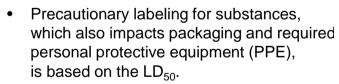
Dataset Description

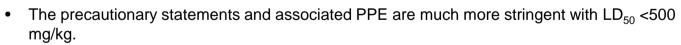
671 formulations from eight companies:

In Vivo EPA Category

In Vivo GHS Classification

- 51 antimicrobial cleaning products (AMCPs)
- 620 agrochemical formulations
- The bar graph shows the distribution of the dataset substances according to their classifications in the EPA and GHS hazard classification systems.
- We used conservative classifications for in vivo LD₅₀s expressed as ranges (e.g., would use 300 mg/kg for 300 to 2000 mg/kg) and limit doses (e.g., would use 2000 for >2000 mg/kg).

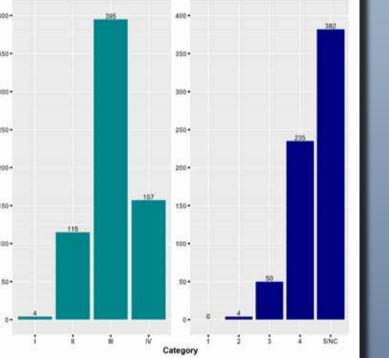




We performed a supplementary analysis that combined all substances with LD₅₀ >500 mg/kg together.

| All Substances | Primary Approach | | | Supplementary Analysis | | |
|-------------------|------------------|----------------|------------------|------------------------|-----------------|------------------|
| | Full | AMCP | Agrochem | Full | AMCP | Agrochem |
| EPA | 55% (367/671) | 84% (43/51) | 52% (324/620) | 82% (547/669) | 100% (51/51) | 80% (496/618) |
| GHS | 72% (484/671) | 98% (50/51) | 70% (434/620) | NA | NA | NA |

| Less Toxic Substances | Primary Approach (Cat IV or 5/NC) | | | Supplementary Analysis (>500 mg/kg) | | |
|--------------------------|-----------------------------------|-----------------|------------------|--|-----------------|------------------|
| | Full | AMCP | Agrochem | Full | AMCP | Agrochem |
| EPA | 87% (138/157) | 95% (38/40) | 85% (99/117) | 93% (514/550) | 100% (51/51) | 93% (463/496) |
| GHS | 88% (337/381) | 100% (49/49) | 87% (288/332) | NA | NA | NA |



79% (128/163) of "discordant" substances (EPA Cat III predicted as Cat IV, yellow highlight) had LD₅₀ values measured between 2000 and 5000 mg/kg or a limit test LD₅₀ >2000 mg/kg. in vivo.

Supplementary Analysis

- Precautionary labeling for substances, which also impacts packaging and required personal protective equipment (PPE), is based on the LD_{50} .
- The precautionary statements and associated PPE are much more stringent with LD_{50} <500 mg/kg.
- We performed a supplementary analysis that combined all substances with LD₅₀ >500 mg/kg together.

| <i>In vivo</i> LD ₅₀ | Addi | Within-class | | |
|---------------------------------|------|--------------|------|-------------|
| | ≤50 | >50 to ≤500 | >500 | Concordance |
| ≤50 | 3 | 1 | 0 | 75% |
| >50 to ≤500 | 4 | 30 | 81 | 26% |
| >500 | 1 | 35 | 514 | 93% |
| Total | 8 | 66 | 595 | 82% |

More Information

Subscribe to the NICEATM News email list: https://list.nih.gov/cgi-bin/wa.exe?SUBED1=niceatm-I&A=1

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Concordance Analysis Summary