

**Draft Updated Assessment of the Validity of the LLNA for Mixtures,  
Metals, and Aqueous Solutions**

**Addendum No. 1 to the ICCVAM Report:** *The Murine Local Lymph Node Assay (LLNA): A Test Method for Assessing the Allergic Contact Dermatitis Potential of Chemicals/Compounds (NIH Pub. No. 99-4494)*

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**LIST OF ABBREVIATIONS AND ACRONYMS**

41	ACD	Allergic contact dermatitis
42	AOO	Acetone: olive oil
43	BGIA	Berufsgenossenschaftliches Institut für Arbeitsschutz (German
44		Institute for Occupational Safety and Health)
45	BRD	Background Review Document
46	BT	Buehler Test
47	CASRN	Chemical Abstracts Service Registry Number
48	CESIO	Comite Europeen des Agents de Surface et de Leurs
49		Intermediaires Organiques (European Committee of
50		Surfactants and Their Organic Intermediates)
51	Conc.	Concentration tested
52	CPSC	U.S. Consumer Product Safety Commission
53	DMF	Dimethylformamide
54	DMSO	Dimethyl sulfoxide
55	EC3	Estimated concentration needed to produce a stimulation index
56		of three
57	ECPA	European Crop Protection Association
58	ECVAM	European Centre for the Validation of Alternative Methods
59	EPA	U.S. Environmental Protection Agency
60	ESAC	ECVAM Scientific Advisory Committee
61	EtOH	Ethanol
62	FDA	U.S. Food and Drug Administration
63	<i>FR</i>	<i>Federal Register</i>
64	GCP	Good Clinical Practice
65	GHS	United Nations Globally Harmonized System for the
66		Classification and Labelling of Chemicals
67	GLP	Good Laboratory Practice
68	g/mol	Grams per Mole
69	GP	Guinea pig
70	GPMT	Guinea Pig Maximization Test

71	GSK	GlaxoSmithKline
72	HCA	Hexyl cinnamic aldehyde
73	HMT	Human Maximization Test
74	HRIPT	Human Repeat Insult Patch Test
75	H <sub>2</sub> O	Water
76	ICCVAM	Interagency Coordinating Committee on the Validation of
77		Alternative Methods
78	IWG	Immunotoxicity Working Group
79	ISO	International Organization for Standardization
80	JaCVAM	Japanese Center for the Validation of Alternative Methods
81	K <sub>ow</sub>	Octanol-water partition coefficient
82	LLNA	Local Lymph Node Assay
83	MeSH	Medical Subject Headings
84	n	Number
85	No.	Number
86	NA	Not available
87	NC	Not calculated
88	NICEATM	National Toxicology Program Interagency Center for the
89		Evaluation of Alternative Toxicological Methods
90	NIEHS	National Institute of Environmental Health Sciences
91	NIOSH	National Institute of Occupational Safety and Health
92	NTP	National Toxicology Program
93	OECD	Organisation for Economic Co-operation and Development
94	OPPTS	Office of Prevention, Pesticides and Toxic Substances
95	QRA	Quantitative Risk Assessment
96	SACATM	Scientific Advisory Committee on Alternative Toxicological
97		Methods
98	SI	Stimulation index
99	TG	Test Guideline
100	TNO	TNO Nutrition and Food Research (Dutch - No English
101		translation)

102	U.K.	United Kingdom
103	U.S.	United States
104	vs.	Versus
105	w/v	Weight to volume ratio



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111 *Applicability Domain*

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**Preface**

127 In 1998, the Interagency Coordinating Committee on the Validation of Alternative Methods  
128 (ICCVAM) in conjunction with the National Toxicology Program (NTP) Interagency Center  
129 for the Evaluation of Alternative Toxicological Methods (NICEATM) evaluated the  
130 validation status of the murine local lymph node assay (LLNA) as an alternative to guinea  
131 pig test methods for assessing the skin sensitization potential of substances. As described in  
132 the ICCVAM evaluation report<sup>1</sup>, ICCVAM recommended that the LLNA could be used as a  
133 valid substitute for most testing situations. However, based on the lack of available data for  
134 aqueous solutions and mixtures and on discordant results for a limited number of studies with  
135 metals, ICCVAM recommended that these substances not be tested for skins sensitization  
136 using the LLNA.

137 Based on the ICCVAM recommendations, the ICCVAM member agencies that require the  
138 regulatory submission of skin sensitization data accepted the LLNA, with the identified  
139 limitations, as an alternative to the traditional guinea pig tests (Guinea Pig Maximization  
140 Test, Buehler Test). In 2002, the LLNA was adopted as Test Guideline 429 by the 30-  
141 member countries of the Organisation for Economic Co-operation and Development  
142 (OECD).

143 The information described in this addendum was compiled by ICCVAM in response to a  
144 nomination submitted in January 2007 by the U.S. Consumer Product Safety Commission for  
145 an assessment of the usefulness and limitations for the LLNA in testing mixtures, metals, and  
146 substances in aqueous solutions, among other activities related to the LLNA.

147 On May 17, 2007, NICEATM published a *Federal Register (FR)* notice (Vol. 72, No. 95, pp.  
148 27815-27817<sup>2</sup>) requesting:

- 149 1. Public comments on the appropriateness and relative priority of the activities  
150 nominated by CPSC
- 151 2. Nominations of expert scientists to consider as members of a peer review  
152 panel

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<sup>1</sup> ICCVAM (1999), available at [http://iccvam.niehs.nih.gov/methods/immunotox/llna\\_PeerPanel98.htm](http://iccvam.niehs.nih.gov/methods/immunotox/llna_PeerPanel98.htm)

<sup>2</sup> available at [http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR\\_E7\\_9544.pdf](http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_E7_9544.pdf)

153                   3. Submission of data for the LLNA and/or any of the modified versions of the  
154                   LLNA under consideration

155 After considering comments from the public and the Scientific Advisory Committee on  
156 Alternative Toxicological Methods (SACATM) on this nomination, ICCVAM assigned it a  
157 high priority, and directed NICEATM and the ICCVAM Immunotoxicity Working Group  
158 (IWG) to conduct a review of the current literature and an evaluation of the available data.  
159 ICCVAM and its IWG developed draft test recommendations based on this evaluation. An  
160 independent peer review panel (Panel) meeting will be convened to peer review the  
161 addendum and to evaluate the extent to which the information contained in the addendum  
162 support the draft recommendations. ICCVAM will consider the conclusions and  
163 recommendations of the Panel, along with comments received from the public and SACATM  
164 when developing a final addendum and final recommendations for each of the nominated  
165 activities.

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191

**Executive Summary**

192 In 1999, the Interagency Coordinating Committee on the Validation of Alternative Methods  
193 (ICCVAM) recommended that the murine local lymph node assay (LLNA) could be used as  
194 a valid substitute for currently accepted guinea pig test methods to assess the skin  
195 sensitization potential of many, but not all types of substances. The recommendation was  
196 based on a comprehensive evaluation of 209 substances tested in the LLNA for which  
197 comparative guinea pig and/or human sensitization data were available (ICCVAM 1999;  
198 Sailstad et al. 2001). The evaluation included an independent scientific peer review panel  
199 (Panel) assessment of the validation status of the LLNA (ICCVAM 1999<sup>1</sup>).

200 ICCVAM forwarded recommendations to U.S. Federal agencies that the LLNA should be  
201 considered for regulatory acceptance or other non-regulatory applications for assessing the  
202 skin sensitization potential of substances, while recognizing that some testing situations  
203 would still require the use of traditional guinea pig test methods (ICCVAM 1999, Sailstad et  
204 al. 2001). The testing situations for which applicability of the LLNA had not been adequately  
205 demonstrated included the evaluation of metals or metal compounds. ICCVAM and the Panel  
206 also noted that there were insufficient data to support the testing of mixtures in the LLNA.  
207 Although not discussed in the original ICCVAM recommendations (ICCVAM 1999; Sailstad  
208 et al. 2001), the use of aqueous vehicles in the LLNA has also been cited as problematic,  
209 presumably due to the propensity of aqueous solutions to run off the ear during treatment.

210 The LLNA was subsequently incorporated into national and international test guidelines for  
211 the assessment of skin sensitization (Organisation for Economic Co-operation and  
212 Development [OECD] Test Guideline 429 [OECD 2002]; International Standards  
213 Organization [ISO] 10993-10: Tests for Irritation and Sensitization [ISO 2002]; U.S.  
214 Environmental Protection Agency [EPA] Health Effect Testing Guidelines on Skin  
215 Sensitization [EPA 2003]).

216 The information described in this addendum to the 1999 ICCVAM report was compiled by  
217 ICCVAM in response to a nomination<sup>2</sup> in January 2007 by the U.S. Consumer Product  
218 Safety Commission (CPSC) for a re-assessment of the applicability domain of the LLNA,

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<sup>1</sup> available at [http://iccvam.niehs.nih.gov/methods/immunotox/llna\\_PeerPanel98.htm](http://iccvam.niehs.nih.gov/methods/immunotox/llna_PeerPanel98.htm)



219 among other activities related to the LLNA. This addendum provides an updated  
220 comprehensive review of available data and information regarding the current usefulness and  
221 limitations of the LLNA for assessing the skin sensitizing potential of mixtures, metals, and  
222 substances tested in aqueous solutions. The information is based on a retrospective review of  
223 traditional LLNA data that were either submitted as part of the original LLNA evaluation  
224 (ICCVAM 1999), extracted from peer-reviewed publications, or submitted to the National  
225 Toxicology Program (NTP) Interagency Center for the Evaluation of Alternative  
226 Toxicological Methods (NICEATM) in response to a *Federal Register (FR)* notice  
227 requesting available data and information (Vol. 72, No. 95, pages 27815-27817, May 17,  
228 2007<sup>3</sup>).

229 The information contained in this addendum is based on a retrospective review of LLNA data  
230 derived from a current database of over 500 substances (including mixtures) tested in the  
231 LLNA. In the original ICCVAM evaluation of the LLNA (ICCVAM 1999), the performance  
232 of the LLNA was compared to 1) the results from guinea pig tests and 2) information about  
233 sensitizers in humans (e.g., human maximization test [HMT] results, substances used in  
234 human repeat insult patch test [HRIPT], clinical data), where available. This addendum  
235 updates the LLNA performance analyses for mixtures, metals, and substances tested in  
236 aqueous solutions when compared to human and guinea pig results.

237 *Mixtures:* The updated NICEATM LLNA database contains test results on 18 mixtures, 15 of  
238 which have comparative guinea pig data while none have comparative human data. In the  
239 guinea pig, six were classified as sensitizers and nine as non-sensitizers. Ten of the 15  
240 mixtures are pesticides (i.e., herbicides, fungicides, insecticides) and four are dyes.  
241 Information on the product class for the remaining mixture was not identified. Information on  
242 the ingredients in the various mixtures is known for only one of the 15 mixtures. Information  
243 on physical form was available for five of the 15 mixtures; four are solids and one is a liquid.  
244 Among these 15 mixtures, in the LLNA, 11 were tested in an aqueous vehicle and four were  
245 tested in a non-aqueous vehicle. Compared to guinea pig, the LLNA has an accuracy of 53%  
246 (8/15), a sensitivity of 50% (3/6), a specificity of 56% (5/9), a false positive rate of 44%

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<sup>2</sup> available at [http://iccvam.niehs.nih.gov/methods/immunotox/llnadocs/CPSC\\_LLNA\\_nom.pdf](http://iccvam.niehs.nih.gov/methods/immunotox/llnadocs/CPSC_LLNA_nom.pdf)

<sup>3</sup> available at [http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR\\_E7\\_9544.pdf](http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_E7_9544.pdf)

247 (4/9), and a false negative rate of 50% (3/6). When considering only aqueous mixtures with  
248 guinea pig data, six are sensitizers and five are non-sensitizers in the LLNA. For these  
249 mixtures, the LLNA has an accuracy of 64% (7/11), a sensitivity of 100% (2/2), a specificity  
250 of 56% (5/9), a false positive rate of 44% (4/9), and a false negative rate of 0% (0/2). When  
251 considering the four non-aqueous mixtures with comparative guinea pig data, the LLNA has  
252 an accuracy and a sensitivity of 25% (1/4) and a false negative rate of 75% (3/4)

253 *Metals:* A total of 17 metal compounds represented by 13 different metals are included in the  
254 updated NICEATM database. All 17 metal compounds had comparative human data and  
255 eight had comparative guinea pig data. Among the 13 metals tested multiple times, nickel  
256 was tested four times in the LLNA as nickel sulfate, three times as nickel chloride, and once  
257 as a nickel (II) salt. Because nickel was classified as a sensitizer in four of these studies and  
258 as a non-sensitizer in the other four, a decision was made to exclude nickel compounds from  
259 the LLNA metals performance analysis.

260 For these remaining 14 metal compounds (13 metals), the LLNA had an accuracy of 86%  
261 (12/14), a sensitivity of 100% (9/9), a specificity of 60% (3/5), a false positive rate of 40%  
262 (2/5) and a false negative rate of 0% (0/9), when compared to human results. The two false  
263 positive compounds were copper chloride and zinc sulfate. All six of the metal compounds  
264 (six different metals with nickel compounds excluded) with comparative guinea pig test  
265 results were predicted as sensitizers by the LLNA. For these metal compounds, the LLNA  
266 had an accuracy of 83% (5/6), a sensitivity of 100% (5/5), a specificity of 0% (0/1), a false  
267 positive rate of 100% (1/1) and a false negative rate of 0% (0/5), when compared to guinea  
268 pig test results. When comparing the performance of the LLNA and the guinea pig tests, for  
269 the six metal compounds tested in all three species, to human results, the LLNA had an  
270 accuracy of 88% (7/8), a sensitivity of 100% (7/7), a specificity of 0% (0/1), a false positive  
271 rate of 100% (1/1) and a false negative rate of 0% (0/7); the accuracy of the guinea pig  
272 against the human remained the same as previously calculated.

273 *Substances tested in aqueous solutions:* A total of 21 substances tested in aqueous solutions  
274 are included in the updated NICEATM database. In the original ICCVAM evaluation of the  
275 validation status of the LLNA, substances tested in aqueous solutions were not analyzed  
276 separately (ICCVAM 1999). Among the 21 substances tested in aqueous solutions, 12 are

277 sensitizers and nine are non-sensitizers in the LLNA. The only product class represented by  
278 more than one aqueous solution (with six substances tested) was pesticides (i.e. herbicide,  
279 fungicides, insecticides).

280 Human data were available for four of the 21 substances tested in aqueous solutions with one  
281 being classified as a sensitizer and three as non-sensitizers by the LLNA. In comparison to  
282 the human data, the LLNA has an accuracy and sensitivity of 50% (1/2), and a false negative  
283 rate of 50% (2/4). Of these 21 substances tested in aqueous solutions, guinea pig data were  
284 available for six, which included two sensitizers and four non-sensitizers in the guinea pig.  
285 Based on the guinea pig test data, the LLNA has an accuracy of 50% (3/6), a sensitivity of  
286 50% (1/2), a specificity of 50% (2/4), a false positive rate of 50% (2/4), and a false negative  
287 rate of 50% (1/2). Two substances tested in aqueous solutions (neomycin sulfate and  
288 propylene glycol) had data available from the LLNA, human tests, and guinea pig tests. One  
289 (neomycin sulfate) was false negative when LLNA data was compared to the guinea pig and  
290 human test results, while the other (propylene glycol) was false negative when the LLNA and  
291 guinea pig data were compared to human data.



**292 1.0 Introduction**

293 In February 1998, the Interagency Coordinating Committee on the Validation of Alternative  
294 Methods (ICCVAM) received a submission from Drs. G. Frank Gerberick (Procter and  
295 Gamble, Cincinnati, United States [U.S.]), David Basketter (Unilever Safety and  
296 Environmental Assurance Centre, United Kingdom [U.K.]), and Ian Kimber (Syngenta  
297 Central Toxicology Laboratory, U.K.) requesting an evaluation of the validation status of the  
298 local lymph node assay (LLNA) as an alternative to the Guinea Pig Maximization Test  
299 (GPMT) and the Buehler Test (BT) for assessing skin sensitization potential. The submission  
300 summarized the performance (relevance and reliability) of the LLNA as compared to the  
301 GPMT and BT methods. An additional analysis was conducted by the National Toxicology  
302 Program (NTP) Interagency Center for the Evaluation of Alternative Toxicological Methods  
303 (NICEATM) to evaluate, where comparable data existed, the comparative performance of the  
304 LLNA and the guinea pig tests against sensitization results obtained in humans. An  
305 independent expert peer review panel (Panel) meeting was convened on September 17, 1998,  
306 to review the completeness of the submission, to determine whether the usefulness and  
307 limitations of the LLNA had been adequately described, and to decide whether its  
308 demonstrated performance supported recommending the LLNA as a stand-alone alternative  
309 to the GPMT and BT. The Panel also was asked to evaluate whether the LLNA offered  
310 advantages with regard to animal welfare considerations (i.e., refinement, reduction, or  
311 replacement<sup>1</sup>).

312 The Panel considered the performance of the LLNA to be similar to that of the GPMT and  
313 BT for identifying moderate to strong sensitizers. The Panel concluded that the LLNA did  
314 not accurately predict all weak sensitizers, nor did it adequately discriminate between strong  
315 skin irritants and skin sensitizers. The LLNA also produced false negative results with some  
316 metals. It was recommended that these issues be evaluated in future studies and workshops.  
317 Furthermore, data to support using the LLNA to test mixtures and substances tested in

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<sup>1</sup> Refinement alternative is defined as a new or revised test method that refines procedures to lessen or eliminate pain or distress to animals, or enhances animal well-being; Reduction alternative is defined as a new or revised test method that reduces the number of animals required; Replacement alternative is defined as a new or revised test method that replaces animals with non-animal systems or one animal species with a phylogenetically lower one (e.g., a mammal with an invertebrate) (ICCVAM 1997).

318 aqueous solutions were not provided and the evaluation of pharmaceuticals was limited. Still,  
319 the Panel noted that when compared with the GPMT and BT methods, the LLNA appeared to  
320 provide equivalent prediction of risk for human allergic contact dermatitis (ACD), based on  
321 comparisons to available human data.

322 In addition, the Panel concluded that the LLNA could be considered a refinement alternative  
323 to the GPMT and BT, because the pain and distress due to sensitization associated with the  
324 guinea pig methods could be virtually eliminated by using the LLNA. ICCVAM agreed that  
325 the LLNA test method, when modified and used in accordance with the Panel report, can be  
326 used effectively for assessment of skin sensitization potential (ICCVAM 1999 [available in  
327 **Appendix A**]).

328 The LLNA was subsequently incorporated into national and international test guidelines for  
329 the assessment of skin sensitization (Organisation for Economic Co-operation and  
330 Development [OECD] Test Guideline 429 [OECD 2002]; International Standards  
331 Organization [ISO] 10993-10: Tests for Irritation and Sensitization [ISO 2002]; U.S.  
332 Environmental Protection Agency [EPA] Health Effect Testing Guidelines on Skin  
333 Sensitization [EPA 2003]).

334 NICEATM conducted this updated evaluation in response to a nomination<sup>2</sup> submitted to  
335 ICCVAM in January 2007 by the U.S. Consumer Product Safety Commission (CPSC). This  
336 addendum to the ICCVAM (1999) report contains an evaluation of the current database for  
337 the LLNA when used to test mixtures, metals, and substances in aqueous solutions in order to  
338 fill some of the data gaps identified in the original evaluation (see **Appendix A**).

339 The data summarized in this addendum are based on information obtained from the peer-  
340 reviewed scientific literature identified through online searches via PubMed and SCOPUS,  
341 through citations in publications, and in response to a *Federal Register (FR)* notice  
342 requesting LLNA, guinea pig, and/or human skin sensitization data and experience (Vol. 72,  
343 No. 95, pp. 27815-27817<sup>3</sup>). Key words used in the online searches for this evaluation were  
344 "LLNA" OR "Local Lymph Node" OR "Local lymph node" OR "local lymph node" AND

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<sup>2</sup> available at [http://iccvam.niehs.nih.gov/methods/immunotox/llnadsocs/CPSC\\_LLNA\\_nom.pdf](http://iccvam.niehs.nih.gov/methods/immunotox/llnadsocs/CPSC_LLNA_nom.pdf)

<sup>3</sup> available at [http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR\\_E7\\_9544.pdf](http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_E7_9544.pdf)

345 (mixture\* OR formula\*)" OR ("metal\* OR aqueous\*"); the last comprehensive search was  
346 completed on January 15, 2008.





347 **2.0 Substances Used for the Updated Evaluation of the Applicability Domain for**  
348 **the LLNA**

349 The information summarized in this addendum is based on a retrospective review of LLNA  
350 data derived from a database of over 500 substances (including mixtures) tested in the LLNA  
351 and builds on the previous ICCVAM evaluation of the LLNA, which was based on 209  
352 substances (ICCVAM 1999). For this evaluation, to minimize the complexity of the analysis,  
353 metal mixtures are not included in the analysis of mixtures and metal compounds, and  
354 aqueous solutions were restricted to those testing single substances. Mixtures were analyzed  
355 as one category and also separately as aqueous and non-aqueous mixtures. The reference  
356 database includes data for metal compounds from the original ICCVAM evaluation  
357 (**Appendix A**), data published since that evaluation, and data submitted in response to a  
358 request in the previously cited *FR* notice. Since an evaluation of the usefulness and  
359 limitations of mixtures and substances tested in aqueous solutions were not included in  
360 original ICCVAM validation (**Appendix A**), because no data on these substances were  
361 available, the reference database for these substances consists of data published since the  
362 original ICCVAM evaluation or submitted in response to the *FR* notice. **Table 2-1** provides  
363 information on the sources of the data and the rationale for the substances tested.

364 Two of the LLNA studies submitted in response to the *FR* notice (from Dr. Dori Germolec at  
365 NIEHS) used the Balb/C strain of mice rather than the CBA/J and CBA/Ca strains of mice  
366 recommended for the LLNA by ICCVAM (ICCVAM 1999, Dean et al. 2001, EPA 2003),  
367 and the OECD (2002). One of these, sodium metasilicate (an aqueous solution), did not have  
368 comparative GP or human data and thus was not included in the performance analysis. The  
369 other study was for potassium dichromate (a metal), which was positive in the LLNA, GP,  
370 and human. As there are 22 LLNA studies for potassium dichromate included in **Appendix**  
371 **C2**, all of which are positive, excluding this study would have no impact on the performance  
372 analysis for metals. Two other studies cited in Griem et al. (2003) used both male and female  
373 mice, but single experiments were limited to one sex. These data were included in the  
374 evaluation.

375

375 **Table 2-1 Summary of Data Sources and Rationale for Substance Selection**

Data Source	N	Substance Selection Rationale
ECPA	39	Plant protection products (i.e., pesticides) were evaluated in the LLNA with a novel vehicle to assess its usefulness
Basketter et al. (1994, 1996, 1999, 2005)	16	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Ryan et al. (2002)	11	Original research with known water soluble haptens and known skin sensitizers to assess the usefulness of a novel vehicle in the LLNA
E. Debruyne (Bayer Crop Science SA)	10	Original research on different pesticide types and formulations in the LLNA
Kimber et al. (1991, 1995, 2003)	9	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Gerberick et al. (2005) <sup>1</sup>	6	Compiled from previously conducted LLNA studies (from published literature and unpublished sources) on substances of varying skin sensitization potential
Bundesanstalt für Arbeitsschutz und Arbeitsmedizin	4	Original LLNA research on different dye formulations
H.W. Vohr (BGIA)	4	Original LLNA research with epoxy resin components as part of a validation effort for non-radioactive versions of the LLNA
Basketter and Scholes (1992) <sup>2</sup>	2	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Gerberick et al. (1992)	2	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
D. Germolec (NIEHS)	2	Substances were evaluated by NTP for skin sensitization potential in the LLNA
Lea et al. (1999)	2	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
M.J. Olson (GlaxoSmithKline)	2	Pharmaceutical substances tested in the LLNA
Unilever (unpublished data)	2	Metal substances evaluated for skin sensitization potential in the LLNA
Basketter and Kimber (2006)	1	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Goodwin et al. (1981)	1	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Griem et al. (2003)	2	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
Kligman (1966)	1	Compiled from previously conducted LLNA studies on substances of varying skin sensitization potential
J. Matheson (CPSC)	1	Published LLNA data submitted electronically to NICEATM, as a reference
K. Skirda (CESIO - TNO Report V7217)	1	Data were provided by CESIO member companies for use in paper titled "Limitations of the LLNA as preferred test for skin sensitization: concerns about false positive and false negative test result"
<b>Total</b>	<b>118</b>	

376 Abbreviations: BGIA=Berufsgenossenschaftliches Institut für Arbeitsschutz; CESIO=Comite Europeen des Agents de  
377 Surface et de Leurs Intermediaires Organiques; CPSC = Consumer Product Safety Commission; ECPA=European Crop  
378 Protection Association; LLNA=Local Lymph Node Assay; NICEATM=National Toxicology Program Interagency Center  
379 for the Evaluation of Alternative Toxicological Methods; NIEHS=National Institute of Environmental Health Sciences;  
380 TNO=TNO Nutrition and Food Research

381 <sup>1</sup>These data were evaluated by European Centre for the Validation of Alternative Methods (ECVAM) Scientific Advisory  
382 Committee in its evaluation of the LLNA limit dose procedure and were previously submitted to ICCVAM in 1998 for the  
383 original evaluation of the validation status of the LLNA (ICCVAM 1999, Gerberick et al. 2005).

384 <sup>2</sup>These LLNA studies used both male and female mice, but single experiments were limited to one sex.

385 To the extent possible, **Appendices B1, C1, and D1** provide information on the  
386 physicochemical properties (e.g., physical form), Chemical Abstracts Service Registry  
387 Number (CASRN), and chemical class for each mixture, metal compound, and substance in  
388 an aqueous solution tested, respectively. This information was obtained from published  
389 reports, submitted data, or through literature searches.

390 When available, chemical classes for each substance were retrieved from the National  
391 Library of Medicine's ChemID Plus database. If chemical classes were not located, they  
392 were assigned for each test substance using a standard classification scheme, based on the  
393 National Library of Medicine Medical Subject Headings (MeSH) classification system<sup>1</sup>.  
394 Some substances were assigned to more than one chemical class; however, no substance was  
395 assigned to more than three classes. One complex pharmaceutical intermediate was simply  
396 identified as a pharmaceutical substance.

397 The generic composition of one of the formulated products evaluated by the European Crop  
398 Protection Association (ECPA) using the LLNA is included in **Appendix E**. None of the  
399 active ingredients have been tested using the LLNA but the active ingredients are historic  
400 materials and have guinea pig data (personal communication by Dr Eric Debruyne, Bayer  
401 CropScience in France). Likewise, none of the inerts (e.g., surfactants, solvents, etc.) have  
402 been tested independently. The formulations for the remaining mixtures have been requested  
403 by NICEATM, but since some of the data is proprietary, it is not available at this time.

404 Of the 18 mixtures evaluated, 10 are pesticide formulations (i.e., herbicides, fungicides,  
405 insecticides) and four are dyes. Information on the product class for the remaining four  
406 mixtures has not been identified. Where information on physical form is available (10/18  
407 mixtures), four are solids and six are liquids. Of the 13 metal compounds evaluated, one  
408 (potassium dichromate) is used in leather tanning and as an oxidizer in organic synthesis.  
409 Most of the remaining 12 metals in the analysis are used as catalysts, conductors of  
410 electricity, or for coating and plating. All of the metal compounds for which information on

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<sup>1</sup> available at <http://www.nlm.nih.gov/mesh/meshhome.html>

411 physical form is identified are solids. Of the 21 substances tested in aqueous solutions  
412 evaluated, six are pesticides (i.e., herbicide, fungicides, insecticides); this is the only product  
413 class represented by more than one substance tested in an aqueous solution.

**414 3.0 Comparative *In Vivo* Reference Data**

415 The reference database for this evaluation includes results using currently accepted guinea  
416 pig test methods for skin sensitization (i.e., the GPMT and the BT) and human clinical  
417 studies and experience (e.g., human repeat insult patch test [HRIPT], human maximization  
418 test [HMT], case reports). In the absence of HRIPT or HMT data, the classification of a  
419 substance as a human sensitizer was based on the classification of the authors of the report.  
420 National and international test guidelines are available for each of these standardized tests  
421 and are thus described in detail elsewhere (OECD 1992, EPA 2003).

422 Ongoing efforts are being made by NICEATM to obtain the original records for all of the  
423 reference data used in this evaluation. Ideally, all data supporting the validity of a test  
424 method should be obtained and reported from animal studies conducted in accordance with  
425 Good Laboratory Practice (GLP) guidelines (OECD 1998; EPA 2006a, 2006b; FDA 2007a).  
426 Equally, data based on human studies should be conducted in compliance with Good Clinical  
427 Practices (GCP) guidelines (ICH 1996). Both sets of guidelines provide an internationally  
428 standardized procedure for the conduct of studies, reporting requirements, archival of study  
429 data and records, and information about the test protocol, in order to ensure the integrity,  
430 reliability, and accountability of a study.

431 The extent to which the human or guinea pig studies were compliant with GCP or GLP  
432 guidelines, respectively, is based on the information provided in published and submitted  
433 reports. The GP data obtained from E. Debruyne (Bayer CropScience SA) and P. Botham  
434 (ECPA) were reportedly conducted according to GLP guidelines. None of the published  
435 references from which GP or human data were obtained have GCP or GLP information  
436 specified.



#### 437 **4.0 LLNA Data and Results**

438 The data used for this evaluation were obtained from 25 sources (**Table 2-1**). No new LLNA  
439 studies were conducted for this evaluation (see **Section 2.0**). Where available, specific  
440 information including name, CASRN, physicochemical properties (e.g., molecular weight,  
441 Log  $K_{ow}$ ), chemical class<sup>1</sup> and data source are indicated for each mixture, metal compound,  
442 and substances tested in an aqueous solution (**Appendices B1, C1, and D1**, respectively).  
443 The concentration tested, along with calculated stimulation index (SI) and/or EC3 (the  
444 concentration that induces an SI of 3) values, are provided in **Appendices B2, C2, and D2**  
445 for mixtures, metal compounds, and substances tested in an aqueous solution, respectively.  
446 Individual components and concentrations of the mixtures and substances tested in an  
447 aqueous solution submitted by Bayer have been requested but due to confidential and  
448 proprietary issues they have only been able to provide the generic composition for four  
449 formulated products (one mixture, three substances tested in an aqueous solution) at this time  
450 (see **Section 2.0**). Furthermore, other than the information provided in the submitted data, no  
451 additional attempt was made to identify the source or purity of the test substance.

452 LLNA classification as to whether a substance was a sensitizer or a non-sensitizer was based  
453 on study data extracted from the sources listed in **Table 2-1** and **Appendices B1, C1, and**  
454 **D1**, with two exceptions. Classification of ammonium tetrachloroplatinate and gold (III)  
455 chloride (both of which are metal compounds) as sensitizers by the LLNA was based on  
456 published reference classifications (Basketter and Scholes 1992, Basketter et al. 1999) and  
457 not on actual LLNA data.

458 The LLNA data included in the ICCVAM (1999) database (**Appendix A**) were reviewed  
459 during the original evaluation. However, the availability of the original data for the other  
460 studies included in this evaluation has not yet been established for all data sources.  
461 Additionally, coding of substances to avoid potential scoring bias was not described in the  
462 previous evaluation of 209 substances (ICCVAM 1999; **Appendix A**) or for any of the newly  
463 obtained studies used in this evaluation.

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<sup>1</sup> Chemical classes were assigned by NICEATM based on the classification of the National Library of Medicine's Medical Subject Heading (available at <http://www.nlm.nih.gov/mesh/meshhome.html>).





## 464 **5.0 Accuracy of the LLNA: Updated Applicability Domain**

465 The ability of the LLNA to correctly identify mixtures, metal compounds, and substances  
466 tested in aqueous solutions as potential skin sensitizers was evaluated when compared to  
467 human and guinea pig data. The classification of mixtures, metal compounds, and substances  
468 tested in aqueous solutions and the relevant data for each substance is located in **Appendices**  
469 **B2, C2, and D2**, respectively. For comparison purposes, the performance of the LLNA  
470 database reported in the ICCVAM evaluation report (ICCVAM 1999; **Appendix A**), is  
471 included in **Tables 5-1 to 5-3**.

### 472 5.1 Testing of Mixtures

473 The original ICCVAM LLNA report (ICCVAM 1999) did not include an analysis on the  
474 ability of the LLNA to predict the skin sensitizing potential of mixtures, because data were  
475 not available for that evaluation (**Appendix A**). The current LLNA database contains data on  
476 18 mixtures, 15 of which have corresponding guinea pig sensitization data while none had  
477 corresponding human sensitization data. Each mixture is tested in either an aqueous vehicle  
478 or a non-aqueous vehicle, and no data is available for mixtures that were tested in both. Thus,  
479 of the 15 mixtures with corresponding guinea pig data, 11 are aqueous mixtures and four are  
480 non-aqueous mixtures (**Appendix B2**). In this analysis, all aqueous mixtures contained at  
481 least 20% water, while non-aqueous mixtures contained no water. The qualitative  
482 formulation for one of the mixtures included in this analysis are known and provided in  
483 **Appendix E**.

484 Among the 15 mixtures with comparative guinea pig data, six are classified as sensitizers and  
485 nine as non-sensitizers in the guinea pig. Compared to these guinea pig data, the LLNA has  
486 an accuracy of 53% (8/15), a sensitivity of 50% (3/6), a specificity of 56% (5/9), a false  
487 positive rate of 44% (4/9), and a false negative rate of 50% (3/6) (**Table 5-1**). When  
488 considering only aqueous mixtures with guinea pig data, the LLNA has an accuracy of 64%  
489 (7/11), a sensitivity of 100% (2/2), a specificity of 56% (5/9), a false positive rate of 44%  
490 (4/9), and a false negative rate of 0% (0/2) (**Table 5-1**). When considering the four non-  
491 aqueous mixtures with comparative guinea pig data, the LLNA has an accuracy and a  
492 sensitivity of 25% (1/4) and a false negative rate of 75% (3/4) (**Table 5-1**).

493 **Table 5-1 Evaluation of the Performance of the LLNA in Testing Mixtures**

Comparison <sup>1</sup>	n <sup>2</sup>	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. <sup>3</sup>	%	No. <sup>3</sup>	%	No. <sup>3</sup>	%	No. <sup>3</sup>	%	No. <sup>3</sup>
LLNA vs. GP <sup>4</sup> (All Mixtures)	15	53	8/15	50	3/6	56	5/9	44	4/9	50	3/6
LLNA vs. GP <sup>4</sup> (Aqueous Mixtures)	11	64	7/11	100	2/2	56	5/9	44	4/9	0	0/2
LLNA vs. GP <sup>4</sup> (Non-Aqueous Mixtures)	4	25	1/4	25	1/4	-	0/0	-	0/0	75	3/4
<i>ICCVAM 1999 Database: Evaluation of LLNA Data vs. GP Data or Human Data<sup>5</sup></i>											
LLNA vs. GP <sup>4</sup>	126	86	108/126	87	81/93	82	27/33	18	6/33	13	12/93
LLNA vs. Human <sup>6</sup>	74	72	53/74	72	49/68	67	4/6	33	2/6	28	19/68
GP <sup>4</sup> vs. Human <sup>6</sup>	62	73	45/62	71	42/59	100	3/3	0	0/3	29	17/59

494 Abbreviations: GP = Guinea pig skin sensitization outcomes; LLNA = Local Lymph Node Assay; No. = Number.  
495 Accuracy (concordance) = the proportion of correct outcomes (positive and negative) of a test method; Sensitivity = the proportion of all  
496 positive substances that are classified as positive; Specificity = the proportion of all negative substances that are classified as negative; False  
497 negative rate: the proportion of all positive substances that are falsely identified as negative; False positive rate = the proportion of all  
498 negative substances that are falsely identified as positive.  
499 <sup>1</sup>This accuracy analysis is only for mixtures that have LLNA data and either corresponding guinea pig or human data; none of the mixtures  
500 analyzed had human data, so a comparison between LLNA vs. human and LLNA vs. GP is not included.  
501 <sup>2</sup>n = Number of substances included in this analysis.  
502 <sup>3</sup>The data on which the percentage calculation is based.  
503 <sup>4</sup>GP refers to outcomes obtained by studies conducted using either the Guinea Pig Maximization Test or the Buehler Test.  
504 <sup>5</sup>For comparison purposes, an excerpt from the ICCVAM evaluation report (ICCVAM 1999; **Appendix A**) showing the overall  
505 performance of the LLNA vs. guinea pig and human, and guinea pig versus human is included here.  
506 <sup>6</sup>Human refers to outcomes obtained by studies conducted using the Human Maximization Test or the inclusion of the test substance in a  
507 Human Patch Test Allergen Kit.

508 As mentioned previously, since comparative human data are not available for any of the  
509 mixtures analyzed, an evaluation of mixtures in the LLNA compared to human performance  
510 could not be assessed. For the same reason, an evaluation of guinea pig versus human  
511 outcomes is also not possible. Also, no mixtures were evaluated in the ICCVAM evaluation  
512 report (ICCVAM 1999; **Appendix A**), so these data and analyses cannot be compared to  
513 previously considered data.

## 514 5.2 Testing of Metal Compounds

515 The ICCVAM LLNA report (ICCVAM 1999) includes a summary on the ability of the  
516 LLNA to predict the skin sensitizing potential of 11 metal compounds, representing 10  
517 different metals (**Appendix A**). In this addendum, the original ICCVAM analysis has been  
518 updated to include a total number of 17 metal compounds, representing 13 different metals,  
519 with corresponding human and/or guinea pig data (**Appendix C**). To reduce the complexity  
520 of the analysis, mixtures containing metals were not classified as metal compounds in this  
521 evaluation. Among these 17 metal compounds, 14 were tested in an aqueous vehicle, a non-

522 aqueous vehicle, or both. The vehicle in which the three remaining metal compounds (i.e.  
523 cobalt chloride, cobalt sulfate, and nickel (II) salts) were tested in was not specified  
524 (**Appendix C2**). Similar to mixtures (**Section 5.1**), aqueous vehicles contained at least 20%  
525 water, while a non-aqueous vehicle contains no water.

526 All 17 metal compounds had comparative human data and eight had comparative guinea pig  
527 data. Among the 13 metals tested multiple times, nickel was tested four times in the LLNA as  
528 nickel sulfate, three times as nickel chloride, and once as a nickel (II) salt. Because nickel  
529 was classified as a sensitizer in four of these studies and as a non-sensitizer in the other four,  
530 a decision was made to exclude nickel compounds from the LLNA metals performance  
531 analysis.

532 Of the 14 remaining metal compounds (13 metals) tested in the LLNA and with human data,  
533 nine are sensitizers and five are non-sensitizers in humans. For these 14 metal compounds,  
534 the LLNA has an accuracy of 86% (12/14), a sensitivity of 100% (9/9), a specificity of 60%  
535 (3/5), a false positive rate of 40% (2/5) and a false negative rate of 0% (0/9), when compared  
536 to human results (**Table 5-2**). For the six metal compounds (after excluding nickel  
537 compounds) with guinea pig data (five sensitizers and one non-sensitizer in the guinea pig),  
538 the LLNA has an accuracy of 83% (5/6), a sensitivity of 100% (5/5), a specificity of 0%  
539 (0/1), a false positive rate of 100% (1/1) and a false negative rate of 0% (0/5), when  
540 compared to guinea pig test results (**Table 5-2**) (**Appendix C2**).

541 Furthermore, all six of the 14 metal compounds with guinea pig data have human data for  
542 comparison and there is a chemical-by-chemical match in classification between the guinea  
543 pig and human outcomes (**Table 5-2**). In contrast, the LLNA incorrectly identified one the  
544 human non-sensitizing metal compounds as a sensitizer. For comparative purposes, the  
545 corresponding performance of the LLNA in predicting the human response for these same six  
546 metal compounds is also provided in **Table 5-2**.

547

547 **Table 5-2 Evaluation of the Performance of the LLNA in Testing Metal Compounds**

Comparison	n <sup>1</sup>	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>
<i>All Metal Compounds (Aqueous and Non-Aqueous Vehicles)</i>											
LLNA vs. GP <sup>3</sup>	6	83	5/6	100	5/5	0	0/1	100	1/1	0	0/5
LLNA vs. Human <sup>4</sup>	14	86	12/14	100	9/9	60	3/5	40	2/5	0	0/9
GP <sup>3</sup> vs. Human <sup>4</sup>	6	100	6/6	100	5/5	100	1/1	0	0/1	0	0/5
LLNA vs. Human <sup>4</sup> for the same GP metal compounds	6	83	5/6	100	5/5	0	0/1	100	1/1	0	0/5
<i>Metal Compounds Tested in Aqueous Vehicles<sup>5</sup></i>											
LLNA vs. GP <sup>3</sup>	1	100	1/1	100	1/1	-	0/0	-	0/0	0	0/1
LLNA vs. Human <sup>4</sup>	1	100	1/1	100	1/1	-	0/0	-	0/0	0	0/1
GP <sup>3</sup> vs. Human <sup>4</sup>	1	100	1/1	100	1/1	-	0/0	-	0/0	0	0/1
<i>Metal Compounds Tested in Non-Aqueous Vehicles</i>											
LLNA vs. GP <sup>3</sup>	5	80	4/5	100	4/4	0	0/1	100	1/1	0	0/4
LLNA vs. Human <sup>4</sup>	12	92	11/12	100	7/7	80	4/5	20	1/5	0	0/7
GP <sup>3</sup> vs. Human <sup>4</sup>	5	100	5/5	100	4/4	100	1/1	0	0/1	0	0/4
<i>ICCVAM 1999 Database: Evaluation of LLNA Data vs. GP Data or Human Data<sup>6</sup></i>											
LLNA vs. GP <sup>3</sup>	126	86	108/126	87	81/93	82	27/33	18	6/33	13	12/93
LLNA vs. Human <sup>4</sup>	74	72	53/74	72	49/68	67	4/6	33	2/6	28	19/68
GP <sup>3</sup> vs. Human <sup>4</sup>	62	73	45/62	71	42/59	100	3/3	0	0/3	29	17/59

548 Abbreviations: GP = Guinea pig skin sensitization outcomes; LLNA = Local Lymph Node Assay; No. = Number.  
549 Accuracy (concordance) = the proportion of correct outcomes (positive and negative) of a test method; Sensitivity = the proportion of all  
550 positive substances that are classified as positive; Specificity = the proportion of all negative substances that are classified as negative; False  
551 negative rate: the proportion of all positive substances that are falsely identified as negative; False positive rate = the proportion of all  
552 negative substances that are falsely identified as positive.

553 <sup>1</sup> n = Number of substances included in this analysis.

554 <sup>2</sup> The data on which the percentage calculation is based.

555 <sup>3</sup> GP refers to outcomes obtained by studies conducted using either the Guinea Pig Maximization Test or the Buehler Test.

556 <sup>4</sup> Human refers to outcomes obtained by studies conducted using the Human Maximization Test or the inclusion of the test substance in a  
557 Human Patch Test Allergen Kit.

558 <sup>5</sup> All the metal compounds tested in an aqueous vehicle were also tested in a non-aqueous vehicle.

559 <sup>6</sup> For comparison purposes, an excerpt from the ICCVAM evaluation report (ICCVAM 1999; **Appendix A**) showing the overall  
560 performance of the LLNA vs. guinea pig and human, and guinea pig versus human is included here.

561 Of the six metal compounds with guinea pig data, the vehicle is known for five of the six  
562 compounds. Four of these metal compounds were tested only in a non-aqueous vehicle, while  
563 one was tested in both an aqueous and non-aqueous vehicle. Thus, when considering only the  
564 metal compound with guinea pig data that was tested in an aqueous vehicle, it was a  
565 sensitizer in the LLNA and the LLNA correctly classified it compared to the guinea pig data.

566 This resulted in an accuracy and sensitivity of 100% (1/1) and a false negative rate of 0%  
567 (0/1) (**Table 5-2**). All of the five metal compounds with comparative guinea pig data tested  
568 in a non-aqueous vehicle are also classified as sensitizing in the LLNA. Compared to guinea  
569 pig data, the LLNA correctly classifies four of the five non-aqueous metal compounds. This  
570 results in an accuracy of 80% (4/5), a sensitivity of 100% (4/4), a specificity of 0% (0/1), a  
571 false positive rate of 100% (1/1) and a false negative rate of 0% (0/4) (**Table 5-2**).

572 Of the 14 metal compounds with human data, the vehicle is known for 12 of the 14  
573 compounds. Eleven of these metal compounds were tested only in a non-aqueous vehicle,  
574 while one was tested in both an aqueous and non-aqueous vehicle. Thus, when considering  
575 only the metal compound with human data that was tested in an aqueous vehicle, the LLNA  
576 correctly classified it as a sensitizer compared to the human data (**Table 5-2**). In contrast, of  
577 the 12 metal compounds with comparative human data tested in a non-aqueous vehicle, eight  
578 are classified as sensitizers and the remaining four are non-sensitizers in the LLNA.

579 Compared to human data, the LLNA correctly classifies 11 of the 12 non-aqueous metal  
580 compounds. This results in an accuracy of 92% (11/12), a sensitivity of 100% (7/7), a  
581 specificity of 80% (4/5), a false positive rate of 20% (1/5) and a false negative rate of 0%  
582 (0/7) (**Table 5-2**).

583 Potassium dichromate was the one metal compound with comparative guinea pig and human  
584 data that was tested in both an aqueous and non-aqueous vehicle. Vehicle information was  
585 available for 20 of the 22 LLNA studies included in this analysis on potassium dichromate,  
586 indicating that it was tested six times in an aqueous vehicle (i.e., 1% Pluronic L92) and 14  
587 times in a non-aqueous vehicle (dimethylformamide [DMF] or DMSO). In all cases, it was  
588 found to be sensitizing by the LLNA regardless of the vehicle used.

589 For the purpose of this addendum, a case-by-case analysis was carried out to determine  
590 whether the overall LLNA classification for each metal compound is as a sensitizer or a non-  
591 sensitizer. In most cases, the majority result determined the overall LLNA skin sensitizing  
592 classification for each metal compound. In instances where there were an equal number of  
593 reports classifying the metal compound as sensitizing or non-sensitizing, the most severe  
594 classification was used. For instance, for zinc sulfate, LLNA data from two studies are  
595 considered in this evaluation report (ICCVAM 1999 [**Appendix A**] and Basketter et al.

596 1999). Zinc sulfate is classified as a sensitizer in ICCVAM 1999 (neither the vehicle nor the  
597 raw data were included) whereas Basketter et al. (1999) classified zinc sulfate as a non-  
598 sensitizer when using DMSO as the vehicle (SI = 2.3 at 25%). For the purposes of this  
599 evaluation, to be conservative, zinc sulfate is classified as a sensitizer (**Appendix C2**).

600 Based on the data compiled for this evaluation, the LLNA classification for nine of the 11  
601 metal compounds evaluated in the 1999 ICCVAM report remained the same in this  
602 evaluation because either no new data were available or classifications based on new data  
603 were consistent with the original classification (**Appendix A**). For the remaining two metal  
604 compounds (nickel chloride and nickel sulfate), additional LLNA data were available, but as  
605 described above, discordant results with nickel compounds in eight different LLNA studies  
606 precluded a definitive classification and it was therefore excluded from this analysis.

### 607 5.3 Testing of Substances in Aqueous Solutions

608 The ICCVAM report (ICCVAM 1999) did not include an analysis of the ability of the LLNA  
609 to predict the skin sensitizing potential of substances tested in aqueous solutions, because  
610 data were not available for that evaluation (**Appendix A**). In this addendum, the ICCVAM  
611 1999 report has been updated to include a total of 21 unique substances tested in aqueous  
612 solutions from 47 LLNA studies with corresponding human and/or guinea pig data  
613 (**Appendix D**). In this analysis, an aqueous solution is defined as a substance tested in a  
614 vehicle containing at least 20% water. The group of substances analyzed for this section of  
615 the addendum does not include any known mixtures or metal compounds tested in aqueous  
616 vehicles, as they have instead been included in the analyses discussed in **Sections 5.1** and **5.2**  
617 (mixtures and metal compounds, respectively).

618 Among the 21 substances tested in aqueous solutions, human data were available for only  
619 four (3 sensitizers/1 non-sensitizer in humans). Of these four, two were correctly identified  
620 by the LLNA when compared to human data. Consequently, for these four substances tested  
621 in aqueous solutions, the LLNA has an accuracy of 50% (2/4), a sensitivity of 33% (1/3), a  
622 specificity of 100% (1/1), a false positive rate of 0% (0/1), and a false negative rate of 67%  
623 (2/3) (**Table 5-3**).

624 **Table 5-3 Evaluation of the Performance of the LLNA in Testing Aqueous**  
 625 **Solutions**

Comparison	n <sup>1</sup>	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>	%	No. <sup>2</sup>
<i>Aqueous Solutions</i>											
LLNA vs. GP <sup>3</sup>	6	50	3/6	50	1/2	50	2/4	50	2/4	50	1/2
LLNA vs. Human <sup>4</sup>	4	50	2/4	33	1/3	100	1/1	0	0/1	67	2/3
GP <sup>3</sup> vs. Human <sup>4</sup>	2	50	1/2	50	1/2	-	0/0	-	0/0	50	1/2
<i>ICCVAM 1999 Database: Evaluation of LLNA Data vs. GP Data or Human Data<sup>5</sup></i>											
LLNA vs. GP <sup>3</sup>	126	86	108/126	87	81/93	82	27/33	18	6/33	13	12/93
LLNA vs. Human <sup>4</sup>	74	72	53/74	72	49/68	67	4/6	33	2/6	28	19/68
GP <sup>3</sup> vs. Human <sup>4</sup>	62	73	45/62	71	42/59	100	3/3	0	0/3	29	17/59

626 Abbreviations: GP = Guinea pig skin sensitization outcomes; LLNA = Local Lymph Node Assay; No. = Number.

627 Accuracy (concordance) = the proportion of correct outcomes (positive and negative) of a test method; Sensitivity = the proportion of all  
 628 positive substances that are classified as positive; Specificity = the proportion of all negative substances that are classified as negative; False  
 629 negative rate: the proportion of all positive substances that are falsely identified as negative; False positive rate = the proportion of all  
 630 negative substances that are falsely identified as positive

631 <sup>1</sup> n = Number of substances included in this analysis.

632 <sup>2</sup> The data on which the percentage calculation is based.

633 <sup>3</sup> GP refers to outcomes obtained by studies conducted using either the Guinea Pig Maximization Test or the Buehler Test.

634 <sup>4</sup> Human refers to outcomes obtained by studies conducted using the Human Maximization Test or the inclusion of the test substance in a  
 635 Human Patch Test Allergen Kit.

636 <sup>5</sup> For comparison purposes, an excerpt from the ICCVAM evaluation report (ICCVAM 1999; **Appendix A**) showing the overall  
 637 performance of the LLNA vs. guinea pig and human, and guinea pig versus human is included here.

638 Guinea pig data were available for six (2 sensitizers/4 non-sensitizers in the guinea pig) of  
 639 the 21 substances tested in aqueous solutions. Thus, the LLNA has an accuracy of 50% (3/6),  
 640 a sensitivity of 50% (1/2), a specificity of 50% (2/4), a false positive rate of 50% (2/4), and a  
 641 false negative rate of 50% (1/2) (**Table 5-3**). There were two substances tested in aqueous  
 642 solutions with comparative human and guinea pig data. Of these, one (propylene glycol) was  
 643 false negative in guinea pig and one (neomycin sulfate) was correctly identified as positive  
 644 compared to human results (**Table 5-3**). These two substances tested in aqueous solutions  
 645 LLNA are false negative compared to human results.

646 For the purpose of this addendum, a case-by-case analysis was carried out to determine  
 647 whether the overall LLNA classification for each substance tested in aqueous solutions is as a  
 648 sensitizer or a non-sensitizer. In most cases, the majority result determined the overall LLNA  
 649 skin sensitizing classification for each substance (i.e., oxyfluorfen EC). In instances where  
 650 there were an equal number of reports classifying the aqueous solution as sensitizing or non-  
 651 sensitizing, the overall LLNA classification took into account the concentrations tested or, if  
 652 the studies appeared to be equal, the most severe classification was used. For instance, in one

653 of two LLNA studies, 1,4-dihydroquinone (in ACE/saline [1:1]) is classified as a skin  
654 sensitizer resulting in an EC3 value of 1.3%. In the other, which also used ACE/saline (1:1)  
655 as the vehicle, 1,4-dihydroquinone is classified as a non-sensitizer (SI = 1.9 at 1%).  
656 However, because the highest concentration tested in the negative study (1%) was below the  
657 EC3 concentration in the positive study (10%), 1,4-dihydroquinone is classified as a  
658 sensitizer in this evaluation (**Appendix D2**).

659 Because no substances tested in aqueous solutions were evaluated in the ICCVAM  
660 evaluation report (ICCVAM 1999; **Appendix A**), these data and analyses cannot be  
661 compared to previously considered data.

662



663 **6.0 LLNA Data Quality**

664 Based on the available information, the published papers, and data submissions, information  
665 on compliance with GLP guidelines was available for data obtained from Gerberick et al.  
666 (2005), H.W. Vohr (BGIA), E. Debruyne (Bayer CropScience SA), P. Botham (ECPA),  
667 Bundesanstalt für Arbeitsschutz und Arbeitsmedizin, and D. Germolec (NIEHS).

668 A formal assessment of the quality of the remainder of the LLNA data considered here was  
669 not feasible. The published data on the LLNA were limited to tested concentrations and  
670 calculated SI and EC3 values. Auditing the reported values would require obtaining the  
671 original individual animal data for each LLNA experiment, which have been requested, but  
672 not yet obtained. However, many of the studies were conducted according to GLP guidelines,  
673 which implies that an independent quality assurance audit was conducted. The impact of any  
674 deviations from GLP guidelines cannot be evaluated for the data reviewed here, since no data  
675 quality audits was obtained.

676 As noted in **Section 5.0**, the original records were not obtained for the studies included in this  
677 evaluation. Data were available for several of the substances included in the ICCVAM  
678 (1999) evaluation and thus some of the raw data for these substances were available for  
679 review.



## 680 7.0 Other Scientific Reports and Reviews

681 A search of Medline, PubMed, and Toxline resulted in 40 published reports relevant to the  
682 applicability domain of the LLNA and the use of the LLNA for testing mixtures, metals and  
683 aqueous solutions for skin sensitizing potential. Of these reports, 23 have been published  
684 since the 1999 ICCVAM report on the LLNA. Included below are the reports most relevant  
685 to the evaluation included in this addendum, with the most salient points summarized for  
686 each.

### 687 7.1 Basketter et al. (1999)

688 Basketter et al. (1999) used the LLNA to evaluate the skin sensitization potential of 13 metal  
689 salts. For the purposes of their evaluation, eight of the 13 metals were considered to be  
690 human sensitizers. Their results show that the LLNA had an accuracy of 85% (11/13),  
691 sensitivity 88% (7/8), specificity of 80% (4/5), false negative rate of 12% (1/8), and false  
692 positive rate of 20% (1/5). Nickel chloride (tested up to 5% in DMSO) was false negative in  
693 the LLNA based on an  $SI \leq 2.4$ . Copper chloride (tested up to 5% in DMSO) was false  
694 positive in the LLNA based on an  $SI \geq 8.1$ . The authors concluded that these data support the  
695 potential utility of the LLNA for testing metal contact allergens.

### 696 7.2 Wright et al. (2001)

697 The authors investigate the influence of application vehicle on sensitizing potency, using the  
698 LLNA to examine the activity of four recognized human contact allergens: isoeugenol and  
699 cinnamic aldehyde and two fragrance chemicals; 3-dimethylaminopropylamine (a sensitizing  
700 impurity of cocamidopropyl betaine, a surfactant used in shower gel) and  
701 dibromodicyanobutane (the sensitizing component of Euxyl K 400, a preservative used in  
702 cosmetics). The four chemicals were applied in each of seven different vehicles (acetone:  
703 olive oil [4 : 1]; dimethyl sulfoxide: methyl ethyl ketone; dimethylformamide; propylene  
704 glycol; and both 50:50 and 90:10 mixtures of ethanol and water). It was found that the  
705 vehicle in which a chemical is presented to the epidermis can have a marked effect on  
706 sensitizing activity. EC3 values ranged from 0.9 to 4.9% for isoeugenol, from 0.5 to 1.7% for  
707 cinnamic aldehyde, from 1.7 to > 10% for dimethylaminopropylamine and from 0.4 to 6.4%  
708 for dibromodicyanobutane. These authors confirm that the vehicle in which a chemical is

709 encountered on the skin has an important influence on the relative skin sensitizing potency of  
710 chemicals and may have a significant impact on the acquisition of allergic contact dermatitis.  
711 The data also demonstrate the utility of the LLNA as a method for the prediction of these  
712 effects and thus for the development of more accurate risk assessments.

### 713 **7.3 Ryan et al. (2002)**

714 Ryan et al. (2002) describe data on Pluronic® L92 (L92), a water-based vehicle, that  
715 possessed better skin wetting properties than water alone and assessed its performance  
716 relative to other solvents in the LLNA using aqueous soluble haptens. Based on their results,  
717 the authors determined that identification of sensitization hazard of aqueous soluble materials  
718 using the LLNA, DMF and DMSO were the preferred vehicles. However, if a test material is  
719 not soluble in DMF or DMSO, or if higher test concentrations can be achieved in an aqueous  
720 vehicle, then 1% L92 may provide a better alternative to water alone in terms of improved  
721 assay performance.

### 722 **7.4 Griem et al. (2003)**

723 The authors propose a quantitative risk assessment methodology for skin sensitization aimed  
724 at deriving ‘safe’ exposure levels for sensitizing substances. In their analysis they used  
725 cinnamic aldehyde and nickel as examples of how they apply their risk assessment proposal  
726 to sensitizing substances. In their discussion of nickel, they reference data supporting that  
727 nickel is an allergen with a relatively low sensitizing potency, but a high prevalence in the  
728 general population (Kligman 1966, Vandenberg and Epstein 1963). Consequently, as in  
729 humans, nickel salts (i.e. nickel chloride and nickel sulfate) are weak sensitizers in animals  
730 and often give negative results in standardized tests (e.g., LLNA). Clinical experience in  
731 humans indicates that nickel allergy preferentially develops after nickel exposure on irritated  
732 or inflamed, but not on healthy skin (Kligman 1966, Vandenberg and Epstein 1963).  
733 Similarly, previously false negative results with nickel salts in the mouse LLNA could  
734 recently be overcome by the addition of a detergent (1% surfactant in water) to the nickel test  
735 solution (Ryan et al. 2002).

736

736 **7.5 Hostynek and Maibach (2003 and 2004)**

737 In these two review papers, the authors consider reports of immediate and delayed type  
738 immune reactions to cutaneous or systemic exposure to copper in humans. They mention that  
739 the electropositive copper ion is potentially immunogenic due to its ability to diffuse through  
740 biological membranes to form complexes in contact with tissue protein. Reports of immune  
741 reactions to copper include ACD, immunologic contact urticaria (ICU), systemic allergic  
742 reactions (SAR) and contact stomatitis (STO). They state that considering the widespread use  
743 of copper intrauterine devices (IUDs) and the importance of copper in coinage, items of  
744 personal adornment and industry, unambiguous reports of sensitization to the metal are  
745 extremely rare, and even fewer are the cases, which appear clinically relevant. Reports of  
746 immune reactions to copper mainly describe systemic exposure from IUDs and prosthetic  
747 materials in dentistry, implicitly excluding induction of the hypersensitivity from contact  
748 with the skin as a risk factor. Based on predictive guinea pig test and the LLNA, copper has a  
749 low sensitization potential. The authors then provide a diagnostic algorithm that might clarify  
750 the frequency of copper hypersensitivity.

751 **7.6 Lalko et al. (2006)**

752 In the fragrance industry, mixtures are commonly found and include oils, which may contain  
753 naturally occurring contact sensitizers. Lalko et al. (2006) describe their studies where they  
754 used the LLNA to evaluate the dermal sensitization potential of basil, citronella, clove leaf,  
755 geranium, litsea cubeba, lemongrass, and palmarosa oils. Three of the major components--  
756 citral, eugenol, and geraniol--were included to investigate any difference in sensitization  
757 potential arising from their exposure in a mixture. Citronella and geranium oils were  
758 negative. The individual components citral, eugenol and geraniol resulted in EC3 values of  
759 6.3%, 5.4% and 11.4%, respectively. In general, the potency of each essential oil did not  
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