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Draft Background Review Document
Current Status of *In Vitro* Test Methods for Identifying
Mild/Moderate Ocular Irritants:

The Hen’s Egg Test – Chorioallantoic Membrane (HET-CAM)
Test Method

Interagency Coordinating Committee on the
Validation of Alternative Methods

National Toxicology Program Interagency Center for the
Evaluation of Alternative Toxicological Methods

National Institute of Environmental Health Sciences
National Institutes of Health
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196	BCOP Bovine Corneal Opacity and Permeability
197	BRD Background Review Document
198	CAM Chorioallantoic membrane
199	CASRN Chemical Abstracts Service Registry Number
200	CPSC U.S. Consumer Product Safety Commission
201	°C Degrees centigrade
202	EC European Commission
203	EC/HO European Commission/British Home Office
204	ECVAM European Center for the Validation of Alternative Methods
205	EEC European Economic Council
206	EPA U.S. Environmental Protection Agency
207	EU European Union
208	FDA U.S. Food and Drug Administration
209	FIFRA Federal Insecticide, Fungicide, and Rodenticide Act
210	<i>FR</i> <i>Federal Register</i>
211	GHS United Nations Globally Harmonized System for Classification and
212	Labelling of Chemicals
213	GLP Good Laboratory Practice
214	HET-CAM Hen's Egg Test-Chorioallantoic Membrane
215	ICCVAM Interagency Coordinating Committee on the Validation of Alternative
216	Methods
217	ICE Isolated Chicken Eye
218	INVITOX <i>In Vitro</i> Techniques in Toxicology (ERGATT FRAME ECVAM Data
219	bank)
220	IRE Isolated Rabbit Eye
221	IS(A), Irritation Score (A) Analysis Method
222	IS(B) Irritation Score (B) Analysis Method
223	ITC Irritation threshold concentration
224	JaCVAM Japanese Center for the Evaluation of Alternative Toxicological
225	Methods

226	MeSH	U.S. National Library of Medicine's Medical Subject Heading
227	MAS	Maximum average score
228	mtc	Mean time of coagulation
229	NL	Not Labeled
230	NICEATM	National Toxicology Program Center for the Evaluation of Alternative
231	Toxicological Methods	
232	NIH	National Institutes of Health
233	OECD	Organisation for Economic Cooperation and Development
234	OPPTS	EPA Office of Prevention, Pesticides and Toxic Substances
235	OSHA	U.S. Occupational Safety & Hazards Administration
236	OTWG	Ocular Toxicity Working Group
237	TNO	TNO Nutrition and Food
238	UN	United Nations
239	ZEBET	German Center for Documentation and Evaluation of Alternative
240		Methods to Animal Experiments

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Preface

463 Accidental contact with hazardous chemicals frequently causes eye injury and visual
464 impairment. United States and international regulatory agencies currently use the Draize
465 rabbit eye test (Draize et al. 1944) to identify potential ocular hazards associated with
466 chemicals. The U.S. Consumer Product Safety Commission, U.S. Environmental Protection
467 Agency (EPA), U.S. Food and Drug Administration, and U.S. Occupational Health and
468 Safety Administration have testing requirements and guidelines for assessing the ocular
469 irritation potential of substances such as pesticides, household products, pharmaceuticals,
470 cosmetics, and agricultural and industrial chemicals.

471 Although ocular safety assessment has clearly helped to protect consumers and workers,
472 concerns have been raised about the humane aspects of the Draize rabbit eye test. Regulatory
473 authorities have adopted various modifications that reduce the number of animals used and
474 the potential pain and distress associated with the procedure. Significant progress has been
475 made during the last decade. Now only one to three rabbits are required per test, compared to
476 six rabbits in the original protocol. Provisions have been added that allow for animals with
477 severe lesions or discomfort to be humanely euthanized.

478 The Interagency Coordinating Committee on the Validation of Alternative Methods
479 (ICCVAM) previously evaluated the validation status of the bovine corneal opacity and
480 permeability (BCOP), isolated chicken eye (ICE), isolated rabbit eye (IRE), and hen's egg
481 test-chorioallantoic membrane (HET-CAM) assays for the identification of severe
482 (irreversible) ocular irritants/corrosives using the EPA, United Nations Globally Harmonized
483 System of Classification and Labeling of Chemicals (GHS), and European Union regulatory
484 hazard classification systems. In ICCVAM's assessment, the performance of the BCOP and
485 ICE assays substantiated their use in testing some substances for regulatory hazard
486 classification. The IRE and HET-CAM assays lacked sufficient performance and/or
487 sufficient data to substantiate their use for regulatory hazard classification.

488 ICCVAM recommended that the BCOP and ICE should be used in a tiered-testing strategy in
489 which positive substances can be classified as ocular corrosives or severe irritants without
490 animal testing. In accordance with the ICCVAM Authorization Act of 2000 (Public
491 Law 106-545), these recommendations were made available to the public and provided to

492 U.S. Federal agencies for consideration in the *ICCVAM Test Method Evaluation Report – In*
493 *Vitro Ocular Toxicity Test Methods for Identifying Severe Irritants and Corrosives* (NIH
494 Publication No: 07-4517, available at
495 http://iccvam.niehs.nih.gov/methods/ocutox/ivocutox/ocu_tmer.htm). The ICCVAM
496 recommendations were accepted by U.S. Federal agencies, and *in vitro* test methods may
497 now be used instead of the Draize rabbit eye test for certain regulatory testing.

498 ICCVAM is now reviewing the validation status of these *in vitro* test methods for
499 identification of nonsevere ocular irritants (that is, those that induce reversible ocular
500 damage) and nonirritants. Accordingly, the National Toxicology Program Interagency Center
501 for the Evaluation of Alternative Toxicological Methods (NICEATM) and the ICCVAM
502 Ocular Toxicity Working Group (OTWG) prepared draft background review documents
503 (BRDs) that summarize the current validation status of each test method based on published
504 studies and other data and information submitted in response to a June 7, 2007, *Federal*
505 *Register* request (72 FR 31582, available at
506 http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_E7_10966.pdf). The BRDs form the
507 basis for draft ICCVAM test method recommendations, which are provided in separate
508 documents. Liaisons from the European Centre for the Validation of Alternative Methods
509 (ECVAM) and the Japanese Centre for the Validation of Alternative Methods (JaCVAM)
510 will provide input and contribute to the OTWG throughout the evaluation process.

511 An international independent scientific peer review panel (Panel) will convene in public
512 forum on May 19–21, 2009, to develop conclusions and recommendations on the *in vitro*
513 BCOP, ICE, IRE, and HET-CAM test methods. The Panel includes expert scientists
514 nominated by ECVAM and JaCVAM. We anticipate that these organizations can use the
515 subsequent independent Panel report to deliberate and develop their own test method
516 recommendations. The Panel will consider these BRDs and evaluate the extent to which the
517 available information supports the draft ICCVAM test method recommendations. ICCVAM
518 will consider the conclusions and recommendations of the Panel, along with comments from
519 the public and the Scientific Advisory Committee on Alternative Toxicological Methods, and
520 then finalize the BRD and test method recommendations. These will be forwarded to Federal
521 agencies for their consideration and acceptance decisions where appropriate.

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Executive Summary

545 **Background**

546 In October 2003, the U.S. Environmental Protection Agency (EPA) submitted to the
547 Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) a
548 nomination requesting the evaluation of several activities related to reducing, replacing, and
549 refining the use of rabbits in the current *in vivo* eye irritation test method (69 FR 13859
550 [March 24, 2004]). In response to this nomination, ICCVAM evaluated the validation status
551 of the bovine corneal opacity and permeability (BCOP), Isolated Chicken Eye (ICE), Isolated
552 Rabbit Eye (IRE), and Hen's Egg Test-Chorioallantoic Membrane (HET-CAM) assays.
553 ICCVAM evaluated the test methods' ability to identify severe (irreversible) ocular
554 irritants/corrosives using the EPA, United Nations Globally Harmonized System of
555 Classification and Labeling of Chemicals (GHS), and European Union (EU) regulatory
556 classification systems. ICCVAM considered two of the alternative test methods, the BCOP
557 assay and ICE assay, to have sufficient performance to substantiate their use for regulatory
558 hazard classification testing of some types of substances. The IRE and HET-CAM assays
559 lacked sufficient performance and/or sufficient data to substantiate their use for regulatory
560 hazard classification. ICCVAM subsequently recommended that the BCOP and ICE methods
561 should be used in a tiered-testing strategy, where positive substances can be classified as
562 ocular corrosives or severe irritants without the need for animal testing. These
563 recommendations were forwarded to U.S. Federal agencies for consideration, and as a result,
564 *in vitro* test methods may now be used instead of conventional tests for certain regulatory
565 testing purposes.

566 ICCVAM is now reviewing the validation status of these *in vitro* test methods for identifying
567 nonsevere ocular irritants (i.e., those that induce reversible ocular damage) and substances
568 not labeled as irritants (i.e., EPA Category IV, EU Not Labeled, GHS Not Classified).
569 Accordingly, the National Toxicology Program Interagency Center for the Evaluation of
570 Alternative Toxicological Methods (NICEATM), in conjunction with an ICCVAM Ocular
571 Toxicity Working Group (OTWG) prepared draft background review documents (BRDs) that
572 summarize the available data and information regarding the validity (usefulness and

573 limitations) of each test method. This BRD summarizes the available information for the
574 HET-CAM test method.

575 **HET-CAM Test Method Protocol**

576 The HET-CAM protocol, first described by Luepke (1985), uses a vascular fetal membrane,
577 the chorioallantoic membrane (CAM), which is composed of the fused chorion and allantois.
578 The CAM has been proposed as a model for a living membrane (such as the conjunctiva)
579 since it comprises a functional vasculature. Additionally, evaluation of coagulation (i.e.,
580 protein denaturation) may reflect corneal damage that may be produced by the test substance.
581 The acute effects induced by a test substance on the small blood vessels and proteins of this
582 soft tissue membrane are proposed to be similar to effects induced by the same test substance
583 in the eye of a treated rabbit. The CAM is evaluated for the development of irritant endpoints
584 (hyperemia, hemorrhage, and coagulation). Depending on the method used to collect data on
585 the endpoints (e.g., time to development, severity of observed effect), qualitative assessments
586 of the irritation potential of test substances are made.

587 **Validation Database**

588 A total of 260 substances and formulations were evaluated among all of the studies under
589 consideration. The chemical classes with the greatest amount of HET-CAM data are alcohols
590 (n = 75), carboxylic acids (n= 51), and formulations (n = 53). For some of the test substances
591 that were identified as formulations, components of the formulation and the relative
592 concentrations of the components were available. The most common product classes tested
593 are solvent, shampoo, surfactants, and cosmetics. Analyses of each of the multiple HET-
594 CAM protocols indicate that the Irritation Score (A) (IS[A]) analysis method achieved the
595 best performance when evaluating substances not labeled as irritants. A total of 63 test
596 substances are included in the available IS(A) database, 60 of which had sufficient *in vivo*
597 data to be assigned an ocular irritancy hazard classification. Among these 60 substances are
598 43 cosmetic and personal care product formulations (including 25 surfactant based
599 formulations and 18 oil/water emulsions) and 17 individual substances (including seven
600 alcohols; no other classes were represented by more than three substances).

601 Detailed *in vivo* data, consisting of cornea, iris and conjunctiva scores for each animal at 24,
602 48, and 72 hours and/or assessment of the presence or absence of lesions at 7, 14, and 21

603 days was necessary to calculate the appropriate EPA (1996), EU (2001), and GHS (UN 2003)
604 ocular irritancy hazard classification. Thus, some of the test substances for which there was
605 only limited *in vivo* data could not be used for evaluating test method accuracy and
606 reliability.

607 **HET-CAM Test Method Accuracy**

608 *Identification of All Ocular Hazard Categories*

609 The ability of the HET-CAM test method to identify all categories of ocular irritation
610 potential, as defined by the GHS, EPA, and EU classification systems (EPA 1996; EU 2001;
611 UN 2003) was evaluated. As indicated in **Table 1**, the overall correct classification for the
612 HET-CAM test method ranged from 38% (23/60) to 41% (24/59), depending on the
613 classification system used.

614 Because a specific analysis method is the focus of the evaluation of HET-CAM for
615 identifying all hazard categories (the IS[A] analysis method), separate analyses were also
616 conducted for all chemical classes and specific physical properties of interest represented in
617 this database of 60 substances by at least five substances (i.e., surfactant based formulations,
618 oil/water emulsions, and alcohols). The results indicate that alcohols tend to be overpredicted
619 by HET-CAM; that is, 75% [6/8] to 88% [7/8] of alcohols classified as mild irritant or not
620 labeled based on Draize test results (and depending on the classification system used) were
621 overpredicted by HET-CAM by at least one hazard category. Similarly, approximately half
622 (44% [8/18] to 53% [9/17]) of the oil/water emulsions were overpredicted by HET-CAM by
623 at least one hazard category. By comparison, surfactants classified as ocular corrosives or
624 severe irritants based on Draize results tended to be underpredicted by HET-CAM (73%
625 [13/17] to 75% [12/16] ocular corrosives or severe irritants underpredicted by HET-CAM as
626 mild or moderate irritants). However, none of these substances were underpredicted as not
627 labeled.

628 Given the proportion of substances in the HET-CAM IS(A) database represented by these
629 chemical and product classes (i.e., 85% [51/60] of the substances are included in one of these
630 three categories), separate analyses without these discordant substances are not particularly
631 informative. However, because of the associated discordance with each type, overall

632 performance particularly for the ocular corrosive and severe irritant category can be
633 improved by excluding certain product types (i.e., surfactant based formulations).

634 **Table 1 Evaluation of the Performance of the HET-CAM Test Method In Predicting Ocular Irritant Classes Compared to**
 635 **the *In Vivo* Rabbit Eye Test Method, as Defined by the EPA, EU, or GHS Classification Systems**

Data Source	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		actual	under	over	actual	under	over	actual	under	over	actual
Overall (EPA)	38% (23/60)	48% (12/25)	52% (13/25)	50% (1/2)	50% (1/2)	0% (0/2)	56% (10/18)	22% (4/18)	22% (4/18)	60% (9/15)	40% (6/15)
Overall (EU)	40% (23/58)	50% (12/24)	50% (12/24)	50% (1/2)	50% (1/2)	0% (0/2)	NA	NA	NA	69% (22/32)	31% (10/32)
Overall (GHS)	41% (24/59)	50% (13/26)	50% (13/26)	- (0/0)	- (0/0)	- (0/0)	80% (4/5)	20% (1/5)	0% (0/5)	64% (18/28)	36% (10/28)

636 Abbreviations: EPA = Environmental Protection Agency Hazard Classification System (EPA 1998); EU = European Union Hazard Classification System (EU
 637 2007); GHS = Globally Harmonized System (UN 2007); HET-CAM = Hen's Egg Test - Chorioallantoic Membrane

638 It is apparent from **Table 1** that the number of substances (n = 0-2) in the moderate irritant
639 category (i.e., EPA Category II, EU R36, and GHS Category 2A) that an adequate evaluation
640 of HET-CAM performance for this category is not feasible. Similarly, while there are 18
641 substances classified as EPA Category III, there are only five substances classified as GHS
642 Category 2B (the EU system does not distinguish mild irritants). This trend is also apparent
643 when evaluating the correct classification for the corrosive/severe substances.

644 *Distinguishing Substances Not Labeled as Irritants from All Other Hazard Categories*

645 The ability of the HET-CAM test method to distinguish substances not labeled as irritants
646 (i.e., EPA Category IV, EU Not Labeled, GHS Not Classified) from all other ocular hazard
647 categories (i.e., EPA Category I, II, or III; EU R41 or R36; GHS Category 1, 2A, or 2B) was
648 also evaluated. Again, this same analysis was performed without specific chemical classes
649 and/or physical properties.

650 As indicated in **Table 2**, overall accuracy ranged from 62% (41/59) to 78 (47/60)%
651 depending on the hazard classification system used. Overall accuracy for the identification of
652 substances not labeled as irritants (i.e., EPA Category IV, EU Not Labeled, GHS Not
653 Classified) from all other categories ranged from 58% (36/58) to 60% (47/60) depending on
654 the hazard classification system used. False positive and false negative rates ranged from
655 approximately 60% (9/15) to 69% (22/32) and 0% (0/26) to 9% (4/45), respectively. The
656 lowest false negative rate (0% [0/26 or 0/31]) was noted for the EU and GHS systems,
657 respectively followed by 9% (4/45) for the EPA system. For all three systems, the correctly
658 identified substances not labeled as irritants (i.e., EPA Category IV, EU Not Labeled, GHS
659 Not Classified) were cosmetic formulations that were either oil/water emulsions or surfactant
660 containing formulations. Among the four false negatives for the EPA system, 100% (4/4, all
661 oil/water emulsion cosmetic formulations) were EPA Category III substances based on a
662 conjunctival redness score of two that required at least three days to resolve. For one of the
663 substances, one out of the six rabbits tested had a conjunctival redness score of two that
664 required 14 days to resolve. Four of the remaining five rabbits in this study had conjunctival
665 redness scores of two that resolved within three days; the last rabbit did not have this lesion.

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667 **Table 2 Accuracy of the HET-CAM IS(A) Test Method for Distinguishing Substances Not Labeled as Irritants from All**
 668 **Other Hazard Categories as Defined by the EPA, EU, and GHS Classification Systems**

Data Source	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Overall (EPA)	60	78	47/60	91	41/45	40	6/15	60	9/15	9	4/45
Overall (EU)	58	62	36/58	100	26/26	31	10/32	69	22/32	0	0/26
Overall (GHS)	59	69	41/59	100	31/31	36	10/28	64	18/28	0	0/31

669 Abbreviations: EPA = Environmental Protection Agency Hazard Classification System (EPA 1998); EU = European Union Hazard Classification System (EU
 670 2007); GHS = Globally Harmonized System (UN 2007); HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane
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682 HET-CAM Test Method Reliability

683 Quantitative and qualitative evaluations of HET-CAM test method reliability have been
684 conducted previously (ICCVAM 2006a). Since the database used for the current evaluation
685 of the HET-CAM test method has not changed, the quantitative evaluation of test method
686 reliability remains unchanged.

687 Interlaboratory Reproducibility

688 However, additional qualitative analyses of interlaboratory reproducibility were conducted to
689 evaluate the extent of agreement of HET-CAM hazard classifications among the five
690 participating laboratories from the interlaboratory validation study (Hagino et al. 1999). As
691 for the accuracy evaluation study, qualitative evaluations of reproducibility were conducted
692 based on 1) the use of the HET-CAM test method for identifying all ocular hazard categories
693 according to the EPA, EU, or GHS systems, and 2) the use of the HET-CAM test method to
694 distinguish substances not labeled as irritants from all other irritant categories.

695 Using the first approach (i.e., identifying all ocular hazard categories), there was 100%
696 agreement among the five laboratories for a majority of the Draize ocular corrosives/severe
697 irritants correctly classified by HET-CAM based on all three classification systems (i.e.,
698 there was 100% agreement for 63% [5/8] of the correctly identified EPA Category I
699 substances and 100% agreement for 71% [5/7] of the correctly identified GHS Category 1 or
700 EU R41 substances). There was 100% agreement among the five laboratories for the one
701 moderate irritant in the database (EPA Category II or EU R36; no GHS Category 2A
702 substances were included), which was overpredicted by HET-CAM. There also was 100%
703 agreement for the mild ocular irritants (i.e., EPA Category III, GHS Category 2B; the EU
704 does not have a mild irritant category), which were uniformly overpredicted. For the Hagino
705 et al. (1999) database, all of the substances not classified as irritants (based on Draize results;
706 i.e., EPA Category IV, EU Not Labeled, GHS Not Classified) were overclassified by HET-
707 CAM. There was 100% among the five laboratories for 86% (6/7) or 75% (3/4) of these
708 substances for the EU and GHS systems, respectively. By comparison, for the two EPA
709 Category IV substances tested, there was either 100% agreement or 80% among the five
710 laboratories.

711 Using the second approach (i.e., distinguishing substances not labeled as irritants from all
712 other ocular hazard categories), there was 100% agreement among the five laboratories for
713 82% (14/17), 76% (13/17), and 94% (16/17) for the 17 substances included in the Hagino et
714 al. (1999) database for the EPA, EU, and GHS classification systems, respectively.

715 There was 100% agreement among the five laboratories for 100% (13/13) of the substances
716 correctly identified as an irritant according to the EPA system (i.e., Category I, II, or III).

717 While neither of the EPA Category IV substances was correctly identified by HET-CAM,
718 there was 60% agreement among the five laboratories for both Category IV substances that
719 were overpredicted by HET-CAM.

720 There was 100% agreement among the five laboratories for 63% (5/8) of the substances
721 correctly identified as an irritant according to the EU system (i.e., R36 or R41). There was at
722 least 60% agreement among the five laboratories for the remaining three substances correctly
723 classified as an irritant. While none of the EU Not Labeled substances were correctly
724 identified by HET-CAM, there was 100% agreement among the five laboratories for 86%
725 (6/7) of these substances that were overpredicted by HET-CAM.

726 There was 100% agreement among the five laboratories for 100% (11/11) of the substances
727 correctly identified as an irritant according to the GHS system (i.e., Category 1, 2A, or 2B).
728 While none of the GHS Not Classified substances were correctly identified by HET-CAM,
729 there was 100% agreement among the five laboratories for 75% (3/4) of these substances that
730 were overpredicted by HET-CAM.

731 As stated above, this BRD provides a comprehensive summary of the current validation
732 status of the HET-CAM test method, including what is known about its reliability and
733 accuracy, and the scope of the substances tested. Raw data for the HET-CAM test method
734 will be maintained for future use, so that these performance statistics may be updated as
735 additional information becomes available.

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754 **1.0 Introduction**

755 **1.1 Background**

756 The current rabbit eye test method identifies both irreversible (e.g., corrosion) and reversible
757 ocular effects. It also provides quantitative scoring that allows for relative categorization of
758 severity for reversible effects such as mild, moderate, or severe irritants (e.g., see U.S.
759 Environmental Protection Agency [EPA] Ocular Classification System discussed below).
760 Current EPA ocular testing guidelines and the United Nations (UN) Globally Harmonized
761 System (GHS) of Classification and Labeling of Chemicals (UN 2003) indicate that if serious
762 ocular damage is anticipated (e.g., irreversible adverse effects on day 21), then a test on a
763 single animal may be considered. If serious damage is observed, then no further animal
764 testing is necessary (EPA 1998; UN 2003). If serious damage is not observed, additional test
765 animals (1 or 2 rabbits) may be evaluated sequentially until concordant irritant or not labeled
766 responses are observed (UN 2003).

767 In 2006, ICCVAM completed an evaluation of the Hen's Egg Test – Chorioallantoic
768 Membrane (HET-CAM) to identify ocular corrosives and severe irritants (ICCVAM 2006a).
769 Following this review, ICCVAM concluded the HET-CAM test method was not suitable for
770 identifying ocular corrosives and severe irritants (i.e., EPA Category I, UN GHS Category 1,
771 EU R41) (ICCVAM 2006b), but this recommendation could be revised as additional data
772 becomes available.

773 ICCVAM is now conducting an evaluation to further characterize the usefulness and
774 limitations of the HET-CAM test method for identifying non-severe irritants and substances
775 not labeled as irritants (i.e., EPA Category II, III, IV; UN GHS Category 2A, 2B, NL, EU
776 R36, NL) (ICCVAM 2006b). As part of this evaluation process, this Background Review
777 Document (BRD) has been prepared to describe the current validation status of the HET-
778 CAM test method, including what is known about its reliability and accuracy, its
779 applicability domain, the number and type of substances tested, and the availability of a
780 standardized protocol. This BRD was prepared for use by an ICCVAM expert panel to aid in
781 the review of HET-CAM as a method to identify all categories of ocular irritants and
782 substances not labeled as irritants. Parallel reviews of the ICE, IRE, and BCOP test methods
783 are being conducted. Results of the Peer Review Panel Report, combined with the analyses

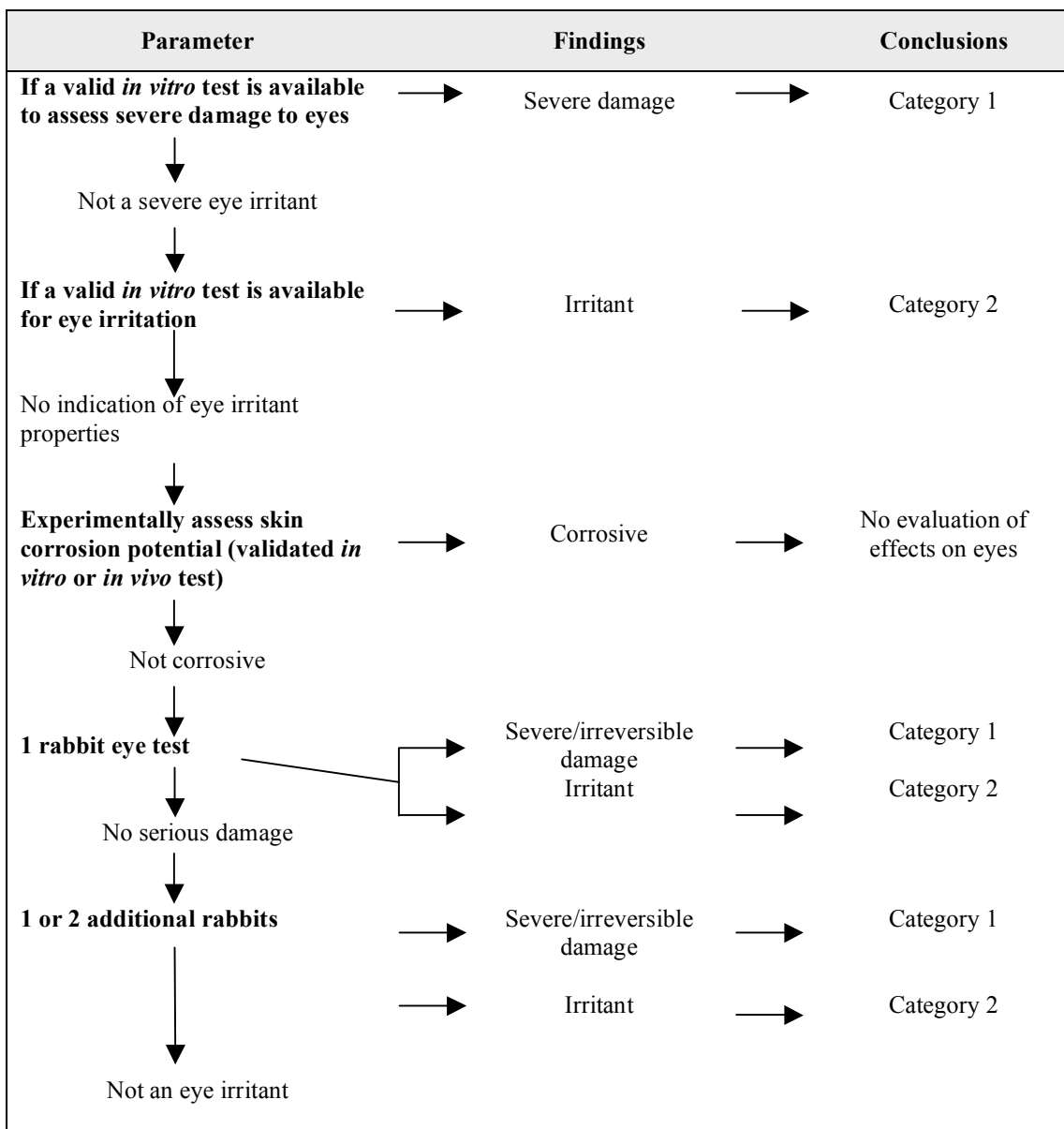
784 presented in the BRDs, will be used to support ICCVAM recommendations on the proposed
785 standardized test method protocols, proposed list of recommended reference substances, and
786 additional optimization and/or validation studies that may be necessary to further develop
787 and characterize the usefulness and limitations of these methods.

788 For a more detailed discussion of the background of the HET-CAM test method, including its
789 scientific basis and regulatory rationale and applicability, see the ICCVAM BRD, *Current*
790 *Status of In Vitro Test Methods for Identifying Ocular Corrosives and Severe Irritants: Hen's*
791 *Egg Test – Chorioallantoic Membrane* (ICCVAM 2006a).

792 **1.2 Use of the HET-CAM Test Method in Overall Strategy of Hazard or Safety** 793 **Assessment**

794 As shown in **Figure 1-1**, the GHS also allows for use of validated and accepted *in vitro*
795 methods to identify severe ocular irritants/corrosives and ocular irritants without further
796 testing. The HET-CAM test method is currently not recommended for use in identifying
797 ocular corrosives and severe irritants in a tiered-testing strategy for regulatory classification
798 and labeling for use in the GHS testing scheme (UN 2003). As indicated above, ICCVAM is
799 now conducting an evaluation to further characterize the usefulness and limitations of the
800 HET-CAM test method for identifying nonsevere irritants and substances not labeled as
801 irritants.

802 **Figure 1-1 GHS Testing Strategy for Serious Eye Damage and Eye Irritation¹**



803 Abbreviations: GHS = United Nations Globally Harmonized System of Classification and Labelling of
 804 Chemicals

805 ¹Adapted from UN (2002).

806

807 **1.3 Validation of the HET-CAM Test Method**

808 The ICCVAM Authorization Act (Sec. 4(c)) mandates that “[e]ach Federal Agency ... shall
 809 ensure that any new or revised ... test method ... is determined to be valid for its proposed

810 use prior to requiring, recommending, or encouraging [its use].” (Public Law [P.L.] 106-
811 545).

812 Validation is the process by which the reliability and relevance of an assay for a specific
813 purpose are established (ICCVAM 2003). Relevance is defined as the extent to which an
814 assay will correctly predict or measure the biological effect of interest (ICCVAM 2003). For
815 the HET-CAM test method described in the ICCVAM BRD (ICCVAM 2006a), relevance is
816 restricted to how well the test method identifies substances that are capable of producing
817 corrosive or severe irritant effects to the eye. For the current BRD, relevance is based on how
818 well the test method identifies substances that are capable of producing nonsevere ocular
819 irritation or substances not labeled as irritants. Reliability is defined as the reproducibility of
820 a test method within and among laboratories and should be based on its performance with a
821 diverse set of substances that are representative of the types of chemical and product classes
822 that are expected to be tested and cover the range of responses that need to be identified. The
823 validation process will provide data and information that will allow U.S. Federal agencies to
824 develop guidance on the development and use of the HET-CAM test method as part of a
825 tiered-testing approach to evaluating the eye irritation potential of substances.

826 The first stage in this evaluation is the preparation of a BRD that presents and evaluates the
827 relevant data and information about the assay, including its mechanistic basis, proposed uses,
828 reliability, and performance characteristics (ICCVAM 2003). This BRD summarizes the
829 available information on the HET-CAM test method. Where adequate data are available, the
830 qualitative and quantitative performances of the assay are evaluated.

831 **1.4 Search Strategies and Selection of Citations for the HET-CAM BRD**

832 The HET-CAM test method data summarized in this BRD are based on information found in
833 the peer-reviewed scientific literature as detailed in the BRD, *Current Status of In Vitro Test*
834 *Methods for Identifying Ocular Corrosives and Severe Irritants: Hen's Egg Test –*
835 *Chorioallantoic Membrane Test Method* (ICCVAM 2006a). A literature search for published
836 HET-CAM studies over the period from January 2005 to January 2009 using the same
837 terminology and information databases as used in the 2006 ICCVAM BRD (ICCVAM
838 2006a) revealed four studies with available information on HET-CAM protocols or contained

839 data on test substances. While no *in vivo* reference data were included in any of the four
840 citations, *in vivo* data for six of nine substances included in one study were available from the
841 NICEATM database of Draize eye test results. However, these substances were already
842 included in the original analyses (and the HET-CAM results from the new study were in
843 agreement with the previous results), the database used in the HET-CAM performance
844 analysis is the same as the database used in ICCVAM (2006a).

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859 **2.0 HET-CAM Test Method Protocol Components**

860 The HET-CAM protocol, first described by Luepke (1985), uses a vascular fetal membrane,
861 the chorioallantoic membrane (CAM), which is composed of the fused chorion and allantois.
862 The CAM has been proposed as a model for a living membrane (such as the conjunctiva)
863 since it comprises a functional vasculature. Additionally, evaluation of coagulation (i.e.,
864 protein denaturation) may reflect corneal damage that may be produced by the test substance.
865 The acute effects induced by a test substance on the small blood vessels and proteins of this
866 soft tissue membrane are proposed to be similar to effects induced by the same test substance
867 in the eye of a treated rabbit.

868 Since the initial description of the HET-CAM test method, several studies have been
869 conducted to evaluate the feasibility of using HET-CAM as a complete replacement for the *in*
870 *vivo* rabbit ocular test. Most of these reports describe a HET-CAM test method protocol that
871 is similar, but not identical, to the original protocol. These differences include the breed of
872 hen from which eggs are obtained, the endpoints evaluated, data collection procedures, and
873 methods used to analyze the data.

874 To date, no single HET-CAM test method protocol has gained wide acceptance as a
875 standardized protocol. However, for a general description of how the HET-CAM test method
876 is conducted, see ICCVAM (2006a). Briefly, during a HET-CAM study, the test substance is
877 applied to the surface of the CAM. The CAM is subsequently evaluated for development of
878 irritant endpoints (hemorrhage [bleeding], vascular lysis [blood vessel disintegration], and
879 coagulation [intra- and extravascular protein denaturation]). Depending on the method used to
880 collect data on the endpoints (e.g., time to development, severity of observed effect)
881 qualitative assessments of the irritation potential of test substances are made. As detailed in
882 **Section 6.0**, analyses of each of the multiple HET-CAM analysis methods indicates that the
883 Irritation Score (A) (IS[A]) analysis method achieved the best performance when evaluating
884 substances not labeled as irritants. Therefore, the IS(A) method is described here. For a
885 description of the other HET-CAM analysis methods (i.e., Q-score, mtc10, ITS, and S-score),
886 see ICCVAM (2006a).

887 2.1 The Irritation Score (IS) Analysis Method

888 For those test method protocols that assigned a score to each of the endpoints evaluated at
889 preset time intervals, the values assigned to each endpoint were totaled to give an IS value
890 for the test substance (i.e., IS[A] analysis method). The possible IS values range from 0 (for
891 test substances that do not induce development of any of the toxic endpoints of interest over
892 the range of time intervals) to 21 (for test substances that induced development of all three
893 toxic endpoints within 30 seconds of application of the test substance) (Luepke 1985).

894 For those test method protocols that noted the time that a specific endpoint was first
895 observed, the IS value was calculated (i.e., IS[B] analysis method) using the formula
896 (Kalweit et al. 1987, 1990):

$$897 \left(\left(\frac{(301 - \text{Hemorrhage time})}{300} \right) \times 5 \right) + \left(\left(\frac{(301 - \text{Lysis time})}{300} \right) \times 7 \right) + \left(\left(\frac{(301 - \text{Coagulation time})}{300} \right) \times 9 \right)$$

898 where:

899 *Hemorrhage time* = time (in seconds) of the first appearance of blood hemorrhages

900 *Lysis time* = time (in seconds) of the first appearance of vessel lysis

901 *Coagulation time* = time (in seconds) of the first appearance of protein coagulation

902 The IS value, when calculated using this formula, has a maximal value of 21.

903 When the development of hyperemia, injection, or another toxic endpoint was evaluated
904 instead of vessel lysis, the time to first appearance for the alternative endpoint replaced the
905 lysis time point.

906 2.1.1 IS Classification Scheme

907 For studies that used the analysis methods developed by Luepke (1985) or Kalweit et al.
908 (1987, 1990), the ocular irritancy classification scheme described in **Table 2-1** was used for
909 the accuracy analysis presented in this BRD (see **Section 6.0**). Therefore, substances with an
910 IS(A) or IS(B) value of nine or greater were classified as severe irritants for the purposes of
911 this analysis. The rationale for the decision criteria used in this classification scheme were
912 not provided and the correlation of these categories to irritancy categories described by the
913 EPA (1996), GHS (UN 2003), and EU (2001) classification systems is unknown.

914

914 **Table 2-1 IS Classification Scheme Used to Classify Substances for Accuracy Analysis¹**

HET-CAM Score Range	Irritation Category
0 to 0.9	Not Labeled
1 to 4.9	Slight Irritation
5 to 8.9	Moderate Irritation
9 to 21	Severe Irritation

915 ¹According to Luepke (1985) and Kalweit et al. (1987, 1990).

916 **3.0 Substances Used for Validation of the HET-CAM Test Method**

917 **3.1 Rationale for the Substances or Products Selected for Use**

918 *In vitro* ocular test method validation studies should, ideally, evaluate an adequate sample of
919 test substances and products from chemical and product classes that would be evaluated
920 using the *in vivo* rabbit eye test method. Test substances with a wide range of *in vivo* ocular
921 responses (e.g., corrosive/severe irritant to not labeled) also should be assessed to determine
922 any limit to the range of responses that can be evaluated by the *in vitro* test method.

923 As noted in **Section 1.5**, although new HET-CAM data were identified among four studies
924 published since the ICCVAM evaluation of HET-CAM for identifying ocular corrosives and
925 severe irritants (ICCVAM 2006a), the only substances for which *in vivo* reference data were
926 available were already included in the original HET-CAM database. Therefore, the same
927 database was used in the current evaluation (i.e., CEC 1991; Gettings et al. 1991, 1994, 1996;
928 Bagley et al. 1992; Vinardell and Macián, 1994; Balls et al. 1995; Kojima et al. 1995;
929 Gilleron et al. 1996, 1997; Spielmann et al. 1996; Hagino et al. 1999). As detailed in **Section**
930 **6.0**, analyses of each of the multiple HET-CAM protocols indicates that the IS(A) analysis
931 method achieved the best performance when evaluating substances not labeled as irritants.
932 The available database for the IS(A) includes a total of 63 test substances, of which *in vivo*
933 reference data are available for 60 compounds.

934 **Table 3-1** and **Table 3-2** show the chemical classes and product classes for the test
935 substances included in the original assessment. Information, including substance name,
936 Chemical Abstracts Service Registry Number (CASRN), chemical and/or product class,
937 concentration(s) tested, purity, supplier or source, and literature reference using the test
938 substance are provided in **Appendix A**. However, if a product class was not assigned in the
939 study report, this information was sought from other sources, including the National Library
940 of Medicine's ChemID Plus database. Chemical classes were assigned to each substance
941 using a standard classification scheme, based on the National Library of Medicine Medical
942 Subject Headings (MeSH) classification system (available at: <http://www.nlm.nih.gov/mesh>)
943 that ensures consistency in classifying substances among all *in vitro* ocular test methods
944 under consideration. Importantly, a substance could be assigned to more than one chemical
945 or product class.

946 **Table 3-1 Chemical Classes Tested in the HET-CAM Test Method**

Chemical Class	# of Substances	Chemical Class	# of Substances
Acyl halide	2	Inorganic salt	14
Alcohol	75	Imide	4
Aldehyde	9	Ketone	15
Alkali	4	Lactone	5
Amide	2	Nitrile	3
Amidine	6	Nitro compound	3
Amine	34	Onium compound	22
Amino acid	7	Organic salt	50
Carbohydrate	1	Organometallic compound	2
Carboxylic acid	51	Organophosphorous compound	1
Ester	34	Organosilicon compound	6
Ether	38	Phenol	4
Formulation	53	Polycyclic compound	11
Heterocyclic compound	37	Organic sulfur compound	18
Hydrocarbon, Acyclic	5	Unknown	28
Hydrocarbon, Cyclic	5	Urea	3
Inorganic boron compound	2		

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947 As shown in **Table 3-1**, the chemical classes with the greatest amount of HET-CAM data are
 948 alcohols (n = 75), carboxylic acids (n= 51), and formulations (n = 53). Of the 504 substances
 949 included in **Appendix B**, 28 substances, including formulations and mixtures of unknown
 950 composition, could not be assigned a specific chemical class.

951 As shown in **Table 3-2**, the most common product classes tested in the HET-CAM assay are
 952 solvents (n = 13), hair shampoos (n = 13), surfactants (n = 17), and cosmetics (n = 14). Of the
 953 504 substances included in **Appendix B**, 167 were unable to be classified within a product
 954 class.

955 As described in **Section 6.0**, analyses of each of the multiple HET-CAM protocols indicates
 956 that the IS(A) analysis method achieved the best performance when evaluating substances
 957 not labeled as irritants. The total available database for the IS(A) analysis method includes 63
 958 substances, for which 60 have available *in vivo* reference data. Among these 60 substances

959 are 43 cosmetic and personal care product formulations (including 25 surfactant based
 960 formulations and 18 oil/water emulsions) and 17 individual substances (including seven
 961 alcohols; no other classes represented by more than three substances).

962 **Table 3-2 Product Classes Tested in the HET-CAM Test Method**

Product Class	# of Substances
Aerosol formulation ingredient	1
Anti-freezing agent	1
Anti-infective agent, Anti-bacterial agent	2
Anti-perspirant	1
Bactericide, Biocide, Fungicide, Germicide	4
Beverage	1
Cationic surface active agent	1
Chemical intermediate	6
Cleaner	1
Conditioner, Hair	2
Cosmetics	14
Cream	1
Disinfectant	1
Drug vehicle	1
Emollient	2
Fertilizer	1
Flavor ingredient	5
Fragrances	4
Industrial explosive	1
Laboratory reagent	7

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Product Class	# of Substances
Lotion	3
Lubricant	1
Mouthwash	1
Neurotransmitter	2
Pesticide	5
Pharmaceutical agent, Pharmaceutical intermediate, Pharmaceutical metabolite	4
Plasticizer	2
Polymer	1
Preservative	1
Raw material	1
Shampoo, Hair	13
Solvent	13
Sunscreen	3
Surfactant	17
Synthetic flavor ingredient, Flavor ingredient	4
Synthetic intermediate	1
Unknown	167

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975 **4.0 In Vivo Reference Data Used for an Assessment of Test Method** 976 **Accuracy**

977 A detailed description of the test method protocol predominantly used to generate the *in vivo*
978 reference data (i.e., the Draize rabbit eye test) is provided in ICCVAM (2006). There also are
979 a number of national and international test guidelines that describe this procedure (EPA
980 1998, OECD 2002, CPSC 2003, EU 2004). The scoring system used for assigning an ocular
981 hazard classification is subjective and based on a discrete scale for grading the severity of
982 ocular lesions on the cornea, iris, and conjunctiva.

983 Most of the HET-CAM studies evaluated in this BRD include *in vivo* reference data
984 generated using the basic procedures for the *in vivo* rabbit eye test method described above.
985 These data were used by NICEATM to assign an ocular hazard classification according to the
986 EPA (1996), the EU (2001), and the GHS (UN 2003) ocular irritancy classification systems
987 (**Appendix D**). Exceptions included the following:

- 988 • *In vivo* data used by Gilleron et al. (1996) were obtained from the studies of
989 Gautheron et al. (1994). According to the report, the studies were performed
990 according to the French and European directives (EEC 1984, 1991). Substances
991 were classified by the authors according to the EU (1993) classification system
992 and used to assess the *in vitro* test method accuracy.

993 **4.1 In Vivo Classification Criteria Used for BRD Analysis**

994 As described in ICCVAM (2006a), the *in vivo* rabbit eye database used to conduct
995 retrospective analyses of the accuracy of the HET-CAM test method includes studies that
996 were conducted using from one to six rabbits. However, some of the *in vivo* classification
997 systems considered for the accuracy analyses are currently devised to be applied to studies
998 using no more than three rabbits. Thus, to maximize the amount of data used for the
999 evaluation of HET-CAM, as well as for the three other *in vitro* test methods (ICE, IRE,
1000 BCOP) being evaluated, the decision criteria for each classification system were expanded to
1001 include studies that used more than three rabbits in their evaluation.

1002 All classification systems require the scoring of rabbits using the Draize scoring system,

1003 which occurs until the effect is cleared, but usually not beyond 21 days after the substance is
1004 applied to the eye of the rabbit. In order for a substance to be included in the accuracy
1005 evaluations in this BRD, four criteria must apply. These criteria were:

- 1006 • At least three rabbits were tested in the study, unless a severe effect (e.g.,
1007 corrosion of the cornea) was noted in a single rabbit. In such cases, substance
1008 classification could proceed based on the effects observed in less than three
1009 rabbits.
- 1010 • A volume of 0.1 mL or 0.1 g was tested in each rabbit. A study in which a
1011 lower quantity was applied to the eye was accepted for substance
1012 classification, provided that a severe effect (e.g., corrosion of the cornea,
1013 lesion persistence) was observed in a rabbit.
- 1014 • Observations of the eye must have been made, at a minimum, at 24, 48, and
1015 72 hours following test substance application if no severe effect was observed.
- 1016 • Observations of the eye must have been made until reversibility was assessed,
1017 typically meaning that all endpoint scores were cleared. Results from a study
1018 terminated early were not used, unless the reason for the early termination was
1019 documented.

1020 If any of the above criteria were not fulfilled, then the data for that substance were not used
1021 for the accuracy analyses. The rules used for classification according to the EPA, EU, or
1022 GHS classification systems are detailed in ICCVAM (2006a).

1023 **4.2 *In Vivo* Data Quality**

1024 Ideally, all data supporting the validity of a test method should be obtained and reported from
1025 studies conducted in accordance with Good Laboratory Practice (GLP) guidelines, which are
1026 nationally and internationally recognized rules designed to produce high-quality laboratory
1027 records (OECD 1998; EPA 2003a, 2003b; FDA 2003). These guidelines provide an
1028 internationally standardized approach for the conduct of studies, reporting requirements,
1029 archival of study data and records, and information about the test protocol, in order to ensure
1030 the integrity, reliability, and accountability of a study.

1031 The extent to which the *in vivo* rabbit eye studies, which were used to provide the
1032 comparative data in the published HET-CAM validation studies, were compliant with GLP
1033 guidelines is based on the information provided in the published reports. Based on the
1034 available information, the reports that were identified as following GLP guidelines or used
1035 data obtained according to GLP guidelines were Gettings et al. (1991, 1994, 1996), Balls et
1036 al. (1995), Spielmann et al. (1996), and Hagino et al. (1999).
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1048 **5.0 HET-CAM Test Method Data and Results**

1049 A total of 12 published reports contained sufficient data for an accuracy analysis of the
1050 HET-CAM test method for the identification of all categories of ocular irritation. These
1051 reports are: CEC (1991), Gettings et al. (1991, 1994, 1996), Bagley et al. (1992),
1052 Vinardell and Macián (1994), Balls et al. (1995), Kojima et al. (1995), Gilleron et al.
1053 (1996, 1997), Spielmann et al. (1996), and Hagino et al. (1999).

1054 **5.1 Availability of Copies of Original Data Used to Evaluate the Accuracy and** 1055 **Reliability**

1056 NICEATM requested original HET-CAM data for substances that also had been tested *in*
1057 *vivo* using the standard rabbit eye test by *FR* notice (69 FR 13589) published on March
1058 24, 2004 and available at
1059 http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_04_6487.pdf. A second request
1060 was published on February 28, 2005 (70 FR 9661) and available at
1061 http://iccvam.niehs.nih.gov/SuppDocs/FedDocs/FR/FR_05_3831.pdf. In addition,
1062 authors of selected published HET-CAM studies were contacted and asked to provide the
1063 original HET-CAM data. In response to these efforts, the following *in vitro* data were
1064 obtained:

- 1065 • Summaries of HET-CAM results (e.g., Q-Scores) were obtained for the 60
1066 substances evaluated by Balls et al. (1995) from European Centre for the
1067 Validation of Alternative Methods (ECVAM). The summary data included
1068 the substance name and the average HET-CAM score for the substance.
- 1069 • *In vitro* data for the substances evaluated in Spielmann et al. (1996) were
1070 obtained from Drs. H. Spielmann and M. Liebsch. The data provided
1071 included the overall HET-CAM scores obtained by each laboratory for
1072 each substance evaluated. *In vitro* data for two control substances also
1073 were provided.
- 1074 • Drs. Philippe Vanparys and Freddy Van Goethem provided individual
1075 endpoint scores for each egg evaluated for substances described in
1076 Gilleron et al. (1996, 1997). *In vitro* data for four control substances also
1077 were provided.

1078 **5.2 Description of the Statistical Approaches Used to Evaluate the Resulting**
1079 **Data**

1080 The approach used to analyze HET-CAM study data varied and depended on the method
1081 used to collect the data. For test method protocols that evaluated the time to development
1082 of endpoints (i.e., hemorrhage, lysis, coagulation) that are correlated with ocular
1083 corrosivity or irritation, an IS, Q-Score, or mean time of coagulation (mtc) value was
1084 calculated. For test method protocols that evaluated the severity of the toxic response, an
1085 S-Score was calculated. For test method protocols that evaluated the lowest test substance
1086 concentration needed to produce a minimal response on the CAM, the irritation threshold
1087 concentration (ITC) was determined. The ITC was typically combined with the IS for the
1088 test substance to evaluate ocular irritation or corrosivity potential of a substance.

1089 The focus of the accuracy analysis in this BRD is on the ability of the HET-CAM test
1090 method to identify moderate and mild irritants, as defined by the GHS, EPA, and EU
1091 classification systems (EPA 1996; EU 2001; UN 2003). However, multiple irritancy
1092 schemes have been developed for HET-CAM and different scoring methods and decision
1093 criteria were used. No single uniform irritancy classification scheme was developed for
1094 HET-CAM. Furthermore, the *in vitro* hazard classifications were not always consistent
1095 with or applicable to those based on Draize rabbit eye test data used by the U.S. (EPA
1096 1996), the EU (EU 2001), or the GHS (UN 2003). However, there have been attempts by
1097 some investigators (Gettings et al. 1991, 1994, and 1996; Spielmann et al. 1996) to
1098 correlate HET-CAM scores with the ocular irritation classification scheme described by
1099 the Federal Hazardous Substances Act classification system (CPSC 1988) and by the EU
1100 classification system (EU 1992), respectively.

1101 To evaluate the ability of HET-CAM to identify all ocular hazard categories, as defined
1102 by the EPA (1996), GHS (UN 2003), and EU (2001) classification systems, HET-CAM
1103 results obtained using each of the different analysis methods were assigned an ocular
1104 irritancy classification based on the *in vitro* classification system most commonly used
1105 for that particular data analysis method. Thus, substances were classified in categories,
1106 based on the *in vitro* score, ranging from substances not labeled as irritants to ocular
1107 corrosives or severe irritants (see **Section 2.0**). Some investigators (e.g., Gettings et al.

1108 1996) classified the ocular irritancy potential of test substances using two or more
1109 different analysis methods. In such cases, these data were reclassified according to the
1110 approach used most commonly for each *in vitro* classification scheme and an accuracy
1111 assessment was conducted for each analysis method.

1112 A preliminary evaluation conducted by NICEATM using the various analysis methods
1113 (see **Section 6.1** and **Appendix E**) indicated that only the IS(A) analysis method had
1114 adequate accuracy with which to conduct a study of mild/moderate ocular irritation based
1115 on rabbit eye test data. Therefore, the data was limited to 63 test substances obtained
1116 from Bagley et al. (1992), Gettings et al. (1994, 1996), Kojima et al. (1995), and Hagino
1117 et al. (1999).

1118 **5.3 Summary of Results**

1119 A total of 260 test substances were evaluated in 383 HET-CAM studies for which
1120 comparative *in vivo* data were available (ICCVAM 2006a). A summary of results used to
1121 evaluate test method accuracy is shown in **Appendix D**. This table, sorted by reference,
1122 provides the CASRN (if available), the concentration tested, the calculated *in vitro* score,
1123 the *in vitro* irritation classification of the test substance (based on the irritation
1124 classification schemes in **Section 5.3**), the *in vivo* reference classifications (i.e., GHS,
1125 EPA, EU), and the literature source. Other supporting information, such as purity of the
1126 test substance, was included in the table to the extent that this information was available.
1127 When provided, the specific information extracted for each substance included its name,
1128 CASRN (if available), chemical class, product class, concentration tested, form tested, *in*
1129 *vitro* classification, and reference. If not provided, the CASRN was obtained from
1130 various sources, including the National Library of Medicine's ChemID database
1131 (available at <http://chem2.sis.nlm.nih.gov/chemidplus>). All substances with the same
1132 CASRN were listed under the same name, regardless of the synonym used in the original
1133 report. Chemical and product classes were assigned based on the classification of the
1134 National Library of Medicine's Medical Subject Heading (MeSH; available at
1135 <http://www.nlm.nih.gov/mesh>). **Appendix B** provides information on the names,
1136 synonyms, CASRN, and chemical/product class, where available, for each substance

1137 while **Appendix C** contains the *in vitro* HET-CAM test method data sorted by reference
1138 and alphabetically by substance name.

1139 **5.4 Use of Coded Chemicals and Compliance with GLP Guidelines**

1140 Ideally, all data supporting the validity of a test method should be obtained and reported
1141 in accordance with GLP guidelines and with the use of coded chemicals (OECD 1998;
1142 EPA 2003a, 2003b; FDA 2003). The data quality was evaluated by a review of the
1143 methods section in literature references and the submitted reports. Thus, data quality
1144 presented in the reviewed literature references can only be evaluated to the extent such
1145 information was provided in the published reports. Based on the available information,
1146 the reports that were identified as following GLP guidelines or used data obtained
1147 according to GLP guidelines were Gettings et al. (1991, 1994, 1996), Balls et al. (1995),
1148 Spielmann et al. (1996), and Hagino et al. (1999). Detailed information on coding
1149 procedures used in different studies is provided in Section 3.4 of the ICCVAM BRD
1150 (2006a).

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1162 **6.0 HET-CAM Test Method Accuracy**

1163 **6.1 Accuracy of the HET-CAM Test Method**

1164 A critical component of an ICCVAM evaluation of the validation status of a test method is an
1165 assessment of the accuracy of the proposed test method when compared to the current
1166 reference test method (ICCVAM 2003). This aspect of assay performance is typically
1167 evaluated by calculating:

- 1168 • Accuracy (concordance): the proportion of correct outcomes (positive and
1169 negative) of a test method
- 1170 • Sensitivity: the proportion of all positive substances that are classified as
1171 positive
- 1172 • Specificity: the proportion of all negative substances that are classified as
1173 negative
- 1174 • Positive predictivity: the proportion of correct positive responses among
1175 substances testing positive
- 1176 • Negative predictivity: the proportion of correct negative responses among
1177 substances testing negative
- 1178 • False positive rate: the proportion of all negative substances that are falsely
1179 identified as positive
- 1180 • False negative rate: the proportion of all positive substances that are falsely
1181 identified as negative

1182 The ability of the HET-CAM test method to identify all categories of ocular irritation
1183 potential, as defined by the GHS, EPA, and EU classification systems (EPA 1996; EU 2001;
1184 UN 2003), was evaluated. This same analysis was also performed with specific chemical
1185 classes and/or physical properties excluded based on their previously being identified as
1186 discordant in HET-CAM (ICCVAM 2006a).

1187 These evaluations were conducted on the overall data set by combining results from the
1188 reports detailed in **Section 5.0**, then assigning an overall ocular irritancy classification for

1189 each substance (**Appendix B and C**). When the same substance was evaluated in multiple
1190 laboratories, an overall HET-CAM classification was based on the majority classification
1191 among all of the studies. When there was an equal number of differing irritancy
1192 classifications for substances (e.g., two tests classified a substance as Not Labeled and two
1193 tests classified a substance as a mild irritant), the more severe irritancy classification was
1194 used for the overall classification for the substance (mild irritant, in this case).

1195 HET-CAM performance analyses compared to the Draize rabbit eye test were performed for
1196 each classification system (i.e., GHS, EPA, EU) each of the six HET-CAM protocols (i.e., IS
1197 [A], IS [B], Q-Score, S-Score, IS, and ITC protocols, see **Appendix E**). With the exception
1198 of the IS(A) and IS(B) protocols, all analysis methods had at least one *in vivo* moderate or
1199 severe irritant substance classified *in vitro* as not labeled as an irritant (i.e., EPA Category
1200 IV, EU Not Labeled, GHS Not Classified). However, the IS(B) overclassified most of the
1201 Not Classified Substances (e.g., HET-CAM IS[B] overclassified 93% [39/42] of the GHS
1202 Not Classified substances). Therefore, more extensive analyses of HET-CAM described in
1203 the following sections were restricted to the IS(A) protocol.

1204 **6.1.1 GHS Classification System: HET-CAM Test Method Accuracy**

1205 Five studies (Bagley et al. 1992; Gettings et al. 1994; Gettings et al. 1996; Hagino et al.
1206 1999; Kojima et al. 1995) contained HET-CAM data on 60 substances that were assigned
1207 GHS ocular irritant classifications (UN 2003) (see **Appendix C**). Performance was evaluated
1208 for three individual studies (Gettings et al. 1994; Gettings et al. 1996; Hagino et al. 1999).
1209 Individual analyses were not conducted on the other two studies (Bagley et al. 1992; Kojima
1210 et al. 1995) because they contained data on one and two substances, respectively. Based on *in*
1211 *vivo* rabbit eye test data, 45% (27/60) of substances were classified as Category 1, none were
1212 classified as Category 2A, and 47% (28/60) were classified as Not Labeled. The remaining
1213 5% (3/60) could not be classified due to lack of adequate animal data and are so noted in
1214 **Appendix C**.

1215 **6.1.1.1 Identification of Category 1 Substances (Ocular Corrosives/Severe Irritants)**

1216 The HET-CAM test method correctly identified 48% (113/27) of the Category 1 substances
1217 (**Table 6-1**). Among the remaining 52% (14/27) of Category 1 substances underpredicted by

1218 HET-CAM, 42% (11/26) were classified as Category 2A and 7.6% (2/26) were classified as
1219 Category 2B.

1220 *6.1.1.2 Identification of Category 2A Substances (Moderate Ocular Irritants)*

1221 The HET-CAM test method did not identify any substances as moderate ocular irritants (i.e.,
1222 GHS Cat 2A (**Table 6-1**)).

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1226 **Table 6-1 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1227 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the GHS Classification System¹, by Study and**
 1228 **Overall**

Data Source	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		actual	under	over	actual	under	over	actual	under	over	actual
Gettings et al. (1994)	50% (9/18)	100% (1/1)	0% (0/0)	0% (0/0)	0% (0/0)	0% (0/0)	0% (0/0)	0% (0/0)	0% (0/0)	53% (9/17)	47% (8/17)
Gettings et al. (1996)	29% (7/24)	25% (4/16)	75% (12/16)	0% (0/0)	0% (0/0)	0% (0/0)	50% (1/2)	50% (1/2)	0% (0/2)	67% (4/6)	33% (2/6)
Hagino et al. (1999)	53% (8/15)	100% (8/8)	0% (0/0)	0% (0/0)	0% (0/0)	0% (0/0)	100% (3/3)	0% (0/0)	0% (0/0)	100% (4/4)	0% (0/0)
Overall⁶	41% (24/59)	50% (13/26)	50% (13/26)	0% (0/0)	0% (0/0)	0% (0/0)	80% (4/5)	20% (1/5)	0% (0/5)	64% (18/28)	36% (10/28)

1229 Abbreviations: GHS = Globally Harmonized System; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1230 ¹GHS classification system (UN 2003)

1231 ²Severe = Category 1.

1232 ³Moderate = Category 2A.

1233 ⁴Mild = Category 2B.

1234 ⁵Not Labeled = Not Labeled.

1235 ⁶Overall data set contains 59 test substances that were assigned a GHS classification and includes one additional test substance from Bagley et al. (1992) and one
 1236 from Kojima et al. (1995) that were not included as individual data sources. One additional substance from Kojima et al. (1995) was not included because it was
 1237 classified *in vitro* as Category 1/Category 2A in the rabbit eye test.

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1249 *6.1.1.3 Identification of Category 2B Substances (Mild Ocular Irritants)*

1250 For the five substances that could be evaluated, the HET-CAM test method correctly
1251 identified 20% (1/5) as Category 2B while 80% (4/5) were overpredicted and 0% (0/5) were
1252 underpredicted (**Table 6-1**).

1253 *6.1.1.4 Identification of Not Labeled Substances*

1254 For the 28 substances that could be evaluated, the HET-CAM test method correctly identified
1255 36% (10/28) as substances not labeled as irritants while 64% (18/28) were overpredicted
1256 (**Table 6-1**).

1257 *6.1.1.5 Ability to Distinguish Substances Not Labeled as Irritants from All Other Classes*

1258 In addition to evaluating the ability of the HET-CAM test method to identify each individual
1259 ocular hazard category according to the GHS classification system, ICCVAM also evaluated
1260 the ability of the HET-CAM test method to distinguish ocular substances not labeled as
1261 irritants from all irritant classes¹. Using this approach of identifying substances not labeled as
1262 irritants from all other classes for the 59 substances considered, the HET-CAM test method
1263 has an overall accuracy of 69% (41/59), a sensitivity of 100% (31/31), a specificity of 36%
1264 (10/28), a false positive rate of 64% (18/28), and a false negative rate of 0% (0/31) (**Table 6-**
1265 **2**).

1266 As detailed below, the results from each individual study were also evaluated separately.

1267 **Gettings et al. (1994)**: Based upon the *in vivo* rabbit data, 18 substances were assigned a
1268 GHS classification. The HET-CAM test method, by comparison, has an accuracy of 50%
1269 (9/18), sensitivity of 100% (1/1), specificity of 47% (8/17), false positive rate of 53% (9/17),
1270 and a false negative rate of 0% (0/1) (**Table 6-2**).

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• ¹ ICCVAM (2006) provides an evaluation of the HET-CAM test method for distinguishing ocular corrosives and severe irritants from all other classes. Since the database of HET-CAM test method results has not changed, this analysis has not been repeated here.

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1273 **Table 6-2 Accuracy of the HET-CAM Test Method (IS[A]) for Distinguishing Not Classified Substances from All Other**
 1274 **Irritant Classes as Defined by the GHS Classification System¹, by Study and Overall**

Data Source	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Gettings et al. (1994)	18	50	9/18	100	1/1	47	8/17	53	9/17	0	0/1
Gettings et al. (1996)	24	83	20/24	100	18/18	33	2/6	67	4/6	0	0/18
Hagino et al. (1999)	15	73	11/15	100	11/11	0	0/4	100	4/4	0	0/11
Overall	59	69	41/59	100	31/31	36	10/28	64	18/28	0	0/31

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¹GHS = Globally Harmonized System (UN2003); NC vs Cat 1/2A/2B.

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²N= Number of substances included in this analysis/the total number of substances in the study.

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³No. = Data used to calculate the percentage.

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⁴⁶Overall data set contains 59 test substances that were assigned a GHS classification and includes one additional test substance from Bagley et al. (1992) and one from Kojima et al. (1995) that were not included as individual data sources. One additional substance from Kojima et al. (1995) was not included because it was classified *in vitro* as Category 1/Category 2A in the rabbit eye test.

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1292 **Gettings et al. (1996):** Based on the *in vivo* rabbit data, 24 substances could be assigned a
1293 GHS classification. Based on these 24 substances, the HET-CAM test method has an
1294 accuracy of 83% (20/24), sensitivity of 100% (18/18), specificity of 33% (2/6), false positive
1295 rate of 67% (4/6), and a false negative rate of 0% (0/18).

1296 **Hagino et al. (1999):** Based upon the *in vivo* rabbit data, 15 substances could be assigned a
1297 GHS classification. Based on these 15 substances, the HET-CAM test method has an
1298 accuracy of 73% (11/15), sensitivity of 100% (11/11), specificity of 0% (0/4), false positive
1299 rate of 100% (4/4), and a false negative rate of 0% (0/11).

1300 *6.1.1.6 Performance of the HET-CAM Test Method with Discordant Classes Excluded*

1301 Because a specific analysis method is the focus of the evaluation of HET-CAM for
1302 identifying all hazard categories (the IS[A] analysis method), separate analyses were also
1303 conducted for all chemical classes and specific physical properties of interest represented in
1304 this database of 60 substances by at least five substances (i.e., surfactant based formulations,
1305 oil/water emulsions, and alcohols). The results indicate that alcohols tend to be overpredicted
1306 by HET-CAM (i.e., 75% [4/6] of alcohols classified as Category 2B or Not Classified based
1307 on Draize test results [and depending on the classification system used] were overpredicted
1308 by HET-CAM by at least one hazard category). Similarly, 53% (9/17) of the oil/water
1309 emulsions were overpredicted by HET-CAM by at least one hazard category. By comparison,
1310 surfactant formulations classified as Category 1 based on Draize results tended to be
1311 underpredicted by HET-CAM (75% [12/16] were underpredicted by HET-CAM as Category
1312 2A or 2B). However, none of these substances were underpredicted as Not Classified.

1313 Given the proportion of substances in the HET-CAM IS(A) database represented by these
1314 chemical and product classes (i.e., 85% [51/60] of the substances are included in one of these
1315 three categories), separate analyses without these discordant substances are not particularly
1316 informative. However, because of the associated discordance with each type, overall
1317 performance, particularly for Category 1 substances can be improved by excluding certain
1318 product types (i.e., surfactant based formulations, see **Table 6-3**).

1319 When the ability of the HET-CAM test method to distinguish Not Classified substances from
1320 all irritant classes was evaluated with the specific chemical and product classes removed, the

1321 greatest improvement in false positive rate occurred when alcohols and surfactant
1322 formulations were excluded (the false positive rate decreased from 64% [18/28] to 56%
1323 [10/18]). However, because the false negative rate for the overall database is 0% (0/31), this
1324 rate remained constant regardless of which chemical or product class(es) were excluded
1325 (**Table 6-4**).

1326 **Table 6-3 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1327 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the GHS Classification System¹, with Exclusion**
 1328 **of Discordant Chemical and Physical Classes**

HET-CAM Database	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		Actual	Under	Over	Actual	Under	Over	Actual	Under	Over	Actual
Overall	41% (24/59)	50% (13/26)	50% (13/26)	- (0/0)	- (0/0)	- (0/0)	80% (4/5)	20% (1/5)	0% (0/5)	64% (18/28)	36% (10/28)
w/o Alcohols	47% (24/51)	46% (11/24)	54% (13/24)	-	-	-	67% (2/3)	33% (1/3)	33% (1/3)	58% (14/24)	42% (10/24)
w/o Surfactant Formulations	49% (17/35)	90% (9/10)	10% (1/10)	-	-	-	100% (3/3)	0% (0/3)	0% (0/3)	64% (14/22)	36% (8/22)
w/o Oil/Water Emulsions	41% (15/41)	48% (12/25)	52% (13/25)	-	-	-	80% (4/5)	20% (1/5)	0% (0/5)	82% (9/11)	18% (2/11)
w/o Alcohols and Surfactant Formulations	56% (15/27)	87% (7/8)	12% (1/8)	-	-	-	100% (1/1)	0% (0/1)	0% (0/1)	56% (10/18)	44% (8/18)
w/o Alcohols and Oil/Water Emulsions	39% (13/33)	44% (10/23)	56% (13/23)	-	-	-	67% (2/3)	33% (1/3)	0% (0/3)	71% (5/7)	29% (2/7)
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	67% (6/9)	86% (6/7)	14% (1/7)	-	-	-	100% (1/1)	0% (0/1)	0% (0/1)	100% (1/1)	0% (0/1)

1329 Abbreviations: GHS = Globally Harmonized System; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane
 1330 ¹GHS classification system (UN 2007). ²Severe = Category 1. ³Moderate = Category 2A. ⁴Mild = Category 2B. ⁵Not Labeled = Not Classified.

1331 **Table 6-4 Accuracy of the HET-CAM Test Method (IS[A]) for Distinguishing Substances not labeled as irritants from All**
 1332 **Other Irritant Classes as Defined by the GHS Classification System¹, with Exclusion of Discordant Chemical**
 1333 **and Physical Classes**

HET-CAM Database	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Overall	59	69	41/59	100	31/31	36	10/28	64	18/28	0	0/31
w/o Alcohols	51	73	37/51	100	27/27	0	0/3	58	14/24	0	0/27
w/o Surfactant Formulations	35	60	21/35	100	13/13	36	8/22	64	14/22	0	0/13
w/o Oil/Water Emulsions	41	78	32/41	100	30/30	18	2/11	82	9/11	0	0/30
w/o Alcohols and Surfactant Formulations	27	63	17/27	100	9/9	44	8/18/	56	10/18	0	0/9
w/o Alcohols and Oil/Water Emulsions	33	85	28/33	100	26/26	29	2/7	71	5/7	0	0/26
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	9	67	6/9	100	8/8	0	0/1	100	1/1	0	0/8

1334 Abbreviations: GHS = Globally Harmonized System; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1335 Further analysis of substances for which hazard classification was underpredicted by HET-
1336 CAM according to chemical class indicated that carboxylic acids had the highest proportion
1337 of underpredicted substances (25% [1/4]). Because the entire HET-CAM IS(A) database is
1338 made up of liquid substances, the physical form of underpredicted substances was liquids.
1339 Among the 16 Category 1 surfactants, 75% (12/16) were underpredicted (**Table 6-5**).

1340 According to the GHS classification system, the most overpredicted substances (false
1341 positives) were alcohols, of which HET-CAM overpredicted 75% (6/8). Because the entire
1342 HET-CAM IS(A) database is made up of liquid substances, the physical form of
1343 underpredicted substances was liquids. Only one of the surfactants tested in HET-CAM was
1344 overpredicted (**Table 6-5**).

1345 **6.1.2 EPA Classification System: HET-CAM Test Method Accuracy**

1346 Five studies (Bagley et al. 1992; Gettings et al. 1994; Kojima et al. 1995; Gettings et al.
1347 1996; Hagino et al. 1999) contained HET-CAM test method data on from 63 substances, 60
1348 of which had sufficient *in vivo* data to be assigned an ocular irritancy classification according
1349 to the EPA classification system (EPA 1996) (see **Appendix C**). Based on results from *in*
1350 *vivo* rabbit eye experiments, 41% (26/63) were classified as severe irritants (i.e., Category 1),
1351 3% (2/61) were classified as moderate irritants (i.e., Category II), 29% (18/63) were
1352 classified as mild irritants (i.e., Category III), and 24% (15/63) were classified as not labeled
1353 (i.e., Category IV). The remaining 3% (2/63) of substances could not be classified according
1354 to the EPA classification system due to the lack of adequate animal data and are so noted in
1355 **Appendix C**.

1356 **6.1.2.1 Identification of Category I Substances (Ocular Corrosives/Severe Irritants)**

1357 The HET-CAM test method correctly identified 48% (12/25) of the Category 1 substances
1358 (**Table 6-6**). Among the remaining 52% (13/25) Category 1 substances that were
1359 underpredicted by HET-CAM, 40% (10/25) were classified as Category 2A, and 12% (3/25)
1360 were classified as Category 2B.

1361 **Table 6-5 Evaluation of the Performance of the HET-CAM Test Method Using the GHS¹ Classification System In Predicting**
 1362 **Ocular Irritant Classes Compared to the *In Vivo* Rabbit Eye Test Method by Chemical Class or Physical**
 1363 **Property**

Category	N	Underprediction (<i>In Vivo/In Vitro</i>)						Overprediction (<i>In Vivo/In Vitro</i>)					
		1 (Severe) ²			2A (Moderate) ³		2B (Mild) ⁴	2A (Mod)	2B (Mild)		NL (Not Labeled)		
		NL	2B	2A	NL	2B	NL	1	2A	1	2B	2A	1
Overall	59	0% (0/26)	8% (2/26)	42% (11/26)	-	-	0% (0/5)	-	20% (1/5)	60% (3/5)	32% (9/28)	14% (4/28)	18% (5/28)
Chemical Class⁶													
Alcohol	8	0% (0/2)	0% (0/2)	0% (0/2)	-	-	0% (0/2)	-	0% (0/2)	100% (2/2)	0% (0/4)	50% (2/4)	50% (2/4)
Carboxylic acid	5	0% (0/4)	0% (0/4)	25% (1/4)	-	-	0% (0/1)	-	0% (0/1)	100% (1/1)	-	-	-
Organic salt	6	0% (0/6)	0% (0/6)	17% (1/6)	-	-	-	-	-	-	-	-	-
Properties of Interest													
Liquids	58	0% (0/25)	8% (2/25)	40% (10/25)	0% (0/5)	-	0% (0/2)	-	20% (1/5)	60% (3/5)	32% (9/28)	14% (4/28)	18% (5/28)
Solids	0	-	-	-	-	-	-	-	-	-	-	-	-
Pesticide	0	-	-	-	-	-	-	-	-	-	-	-	-
Surfactant-Total	24	0% (0/16)	12% (2/16)	62% (10/16)	-	-	0% (0/2)	-	50% (1/2)	0% (0/2)	0% (0/6)	0% (0/6)	0% (0/6)
-nonionic	-	-	-	-	-	-	-	-	-	-	-	-	-
-anionic	-	-	-	-	-	-	-	-	-	-	-	-	-
-cationic	--	-	-	-	-	-	-	-	-	-	-	-	-
Oil/Water Emulsion	18	0% (0/1)	0% (0/1)	0% (0/1)	-	-	-	-	-	-	24% (4/17)	12% (2/17)	18% (3/17)
pH-Total	0	-	-	-	-	-	-	-	-	-	-	-	-
-acidic (pH < 7.0)	-	-	-	-	-	-	-	-	-	-	-	-	-
-basic (pH > 7.0)	-	-	-	-	-	-	-	-	-	-	-	-	-

1364 Abbreviations: GHS = Globally Harmonized System; HET-CAM = Hen's Egg Test – Chorioallantoic Membrane
 1365 ¹GHS classification system (UN 2003) ²Severe = Category 1 (GHS) ³Moderate = Category 2A (GHS) ⁴Mild = Category 2B (GHS).

1366 **Table 6-6 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1367 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the EPA Classification System¹, by Study and**
 1368 **Overall**

Data Source	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		actual	under	over	actual	under	over	actual	under	over	actual
Gettings et al. (1994)	78% (14/18)	100% (1/1)	0% (0/1)	0% (0/0)	0% (0/0)	0% (0/0)	38% (3/8)	12% (1/8)	50% (4/8)	56% (5/9)	44% (4/9)
Gettings et al. (1996)	36% (9/25)	24% (4/17)	76% (13/17)	0% (0/0)	0% (0/0)	0% (0/0)	25% (1/4)	75% (3/4)	0% (0/0)	50% (2/4)	50% (2/4)
Hagino et al. (1999)	47% (7/15)	100% (7/7)	0% (0/0)	100% (1/1)	0% (0/1)	0% (0/1)	100% (5/5)	0% (0/5)	0% (0/5)	100% (2/2)	0% (0/2)
Overall⁶	38% (23/60)	48% (12/25)	52% (13/25)	50% (1/2)	50% (1/2)	0% (0/2)	56% (10/18)	22% (4/18)	22% (4/18)	60% (9/15)	40% (6/15)

1369 Abbreviations: EPA = U.S. Environmental Protection Agency; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1370 ¹EPA classification system (EPA 2003)

1371 ²Severe = Category I.

1372 ³Moderate = Category II.

1373 ⁴Mild = Category III.

1374 ⁵Not Labeled = Category IV.

1375 ⁶Overall data set includes 60 test substances that were assigned an EPA hazard classification based on rabbit eye test data. Data from one test substance from
 1376 Bagley et al. (1992) and one from Kojima et al. (1995) were not included as individual data sources. One substance from Kojima et al. (1995) was classified as a
 1377 GHS Category 1/2A and was therefore could not be used in the analysis.

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1380 6.1.2.2 *Identification of Category II Substances (Moderate Ocular Irritants)*

1381 For the two substances that could be evaluated, the HET-CAM test method correctly
1382 identified 50% (1/2) as Category 2A while 50% (1/2) were overpredicted and 0% (0/2) were
1383 underpredicted (**Table 6-6**).

1384 6.1.2.3 *Identification of Category III (Mild Ocular Irritants)*

1385 For the 18 substances that could be evaluated, the HET-CAM test method correctly identified
1386 22% (4/18) as Category 2B while 56% (10/18) were overpredicted and 22% (4/18) were
1387 underpredicted (**Table 6-6**).

1388 6.1.2.4 *Identification of Category IV Substances*

1389 For the 32 substances that could be evaluated, the HET-CAM test method correctly identified
1390 31% (10/32) as substances not labeled as irritants while 69% (22/32) were overpredicted
1391 (**Table 6-6**).

1392 6.1.2.5 *Ability to Distinguish Category IV Substances from All Other Classes*

1393 In addition to evaluating the ability of the HET-CAM test method to identify each individual
1394 ocular hazard category according to the EPA classification system, ICCVAM also evaluated
1395 the ability of the HET-CAM test method to distinguish ocular substances not labeled as
1396 irritants from all irritant classes². Using this approach of identifying substances not labeled as
1397 irritants from all other classes for the 60 substances considered, the HET-CAM test method
1398 has an overall accuracy of 78% (47/60), a sensitivity of 91% (41/45), a specificity of 40%
1399 (6/15), a false positive rate of 60% (9/15), and a false negative rate of 9% (4/45) (**Table 6-7**).

1400 As detailed below, the results from each individual study were also evaluated separately.

1401 **Gettings et al. (1994)**: Based upon the *in vivo* rabbit data, 18 substances were assigned an
1402 EPA classification. The HET-CAM test method, by comparison, has an accuracy of 50%
1403 (9/18), sensitivity of 56% (5/9), specificity of 44% (4/9), false positive rate of 56% (5/9), and
1404 a false negative rate of 44% (4/9) (**Table 6-7**).

² ICCVAM (2006) provides an evaluation of the HET-CAM test method for distinguishing ocular corrosives and severe irritants from all other classes. Since the database of HET-CAM test method results has not changed, this analysis has not been repeated here.

1405 **Gettings et al. (1996):** Based upon the *in vivo* rabbit data, 25 substances were assigned an
1406 EPA classification. The HET-CAM test method, by comparison, has an accuracy of 92%
1407 (23/25), sensitivity of 100% (21/21), specificity of 50% (2/4), false positive rate of 50%
1408 (2/4), and a false negative rate of 0% (0/21).

1409 **Hagino et al. (1999):** Based upon the *in vivo* rabbit data, 15 substances were assigned an
1410 EPA classification. The HET-CAM test method, by comparison, has an accuracy of 87%
1411 (13/15), sensitivity of 100% (13/13), specificity of 0% (0/2), false positive rate of 100%
1412 (2/2), and a false negative rate of 0% (0/13).

1413 6.1.2.6 Performance of the HET-CAM Test Method with Discordant Classes Excluded

1414 Because a specific analysis method is the focus of the evaluation of HET-CAM for
1415 identifying all hazard categories (the IS[A] analysis method), separate analyses were also
1416 conducted for all chemical classes and specific physical properties of interest represented in
1417 this database of 60 substances by at least five substances (i.e., surfactant based formulations,
1418 oil/water emulsions, and alcohols).

1419 Given the proportion of substances in the HET-CAM IS(A) database represented by these
1420 chemical and product classes (i.e., 85% [51/60] of the substances are included in one of these
1421 three categories), separate analyses without these discordant substances are not particularly
1422 informative. However, because of the associated discordance with each type, overall
1423 performance, particularly for the ocular corrosive and severe irritant category can be
1424 improved by excluded certain product types (see **Table 6-8**). The results indicate that
1425 alcohols tend to be overpredicted by HET-CAM (i.e., 100% [7/7] of alcohols classified as
1426 Category III or IV based on Draize test results [and depending on the classification system
1427 used] were overpredicted by HET-CAM by at least one hazard category). Similarly, 47%
1428 (8/17) of the oil/water emulsions were overpredicted by HET-CAM by at least one hazard
1429 category. By comparison, surfactant formulations classified as Category I based on Draize
1430 results tended to be underpredicted by HET-CAM (73% [13/17] were underpredicted by
1431 HET-CAM as Category II or III). However, none of these substances were underpredicted as
1432 Category IV.

1433 When the ability of the HET-CAM test method to distinguish Category IV substances from
1434 all irritant classes was evaluated with the specific chemical and product classes removed, the

1435 greatest improvement in false positive rate occurred when alcohols and surfactant based
1436 formulations were excluded (the false positive rate decreased from 60% [9/15] to 56% [5/9]).
1437 The false negative rate for the overall database 9% (4/45) could be reduced to 0% (0/30) by
1438 excluding oil/water emulsions from the database (**Table 6-9**).

1439 Further analysis of substances for which hazard classification was underpredicted by HET-
1440 CAM according to chemical class indicated that carboxylic acids had the highest proportion
1441 of underpredicted substances (25% [1/4]). Because the entire HET-CAM IS(A) database is
1442 made up of liquid substances, the physical form of underpredicted substances was liquids.
1443 Among the 17 Category I surfactants, 73% (13/17) were underpredicted (**Table 6-10**).

1444 According to the EPA classification system, the most overpredicted substances (false
1445 positives) were alcohols, which overpredicted 100% (7/7) of alcohols. Because the entire
1446 HET-CAM IS(A) database is made up of liquid substances, the physical form of
1447 underpredicted substances was liquids. Three of the surfactants tested in HET-CAM were
1448 overpredicted (**Table 6-10**).

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1452 **Table 6-7 Accuracy of the HET-CAM Test Method for Distinguishing Substances not labeled as irritants from All Other**
 1453 **Irritant Classes as Defined by the EPA Classification System¹, by Study and Overall**

Data Source	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Gettings et al. (1994)	18	50	9/18	56	5/9	44	4/9	56	5/9	44	4/9
Gettings et al. (1996)	25	92	23/25	100	21/21	50	2/4	50	2/4	0	0/21
Hagino et al. (1999)	15	87	13/15	100	13/13	0	0/2	100	2/2	0	0/13
Overall	60	78	47/60	91	41/45	40	6/15	60	9/15	9	4/45

1454

Abbreviations: EPA = U.S. Environmental Protection Agency; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1455

¹ EPA classification system (EPA 1996). Cat IV vs. Cat I/II/III.

1456

²N = Number of substances included in this analysis/the total number of substances in the study.

1457

³No. = Data used to calculate the percentage.

1458

⁴Overall database includes 60 test substances that were assigned an EPA hazard classification based on rabbit eye test data. Data on one test substance from Bagley et al. (1992) and another substance from Kojima et al. (1995) were not included as individual data sources. Data on one substance from Kojima et al. (1995) was classified as a GHS Category 1/2A and, therefore, was also not used in the analysis.

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1463 **Table 6-8 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1464 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the EPA Classification System¹, with Exclusion**
 1465 **of Discordant Chemical and Physical Classes**

HET-CAM Database	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		Actual	Under	Over	Actual	Under	Over	Actual	Under	Over	Actual
Overall	41% (24/59)	50% (13/26)	50% (13/26)	0% (0/0)	0% (0/0)	0% (0/0)	80% (4/5)	20% (1/5)	0% (0/5)	64% (18/28)	36% (10/28)
w/o Alcohols	42% (22/52)	46% (11/24)	54% (13/24)	50% (1/2)	50% (1/2)	0% (0/2)	38% (5/13)	31% (4/13)	31% (4/13)	54% (7/13)	46% (6/13)
w/o Surfactant Formulations	40% (14/35)	100% (8/8)	0% (0/8)	50% (1/2)	50% (1/2)	0% (0/2)	64% (9/14)	7% (1/14)	29% (4/14)	64% (7/11)	36% (4/11)
w/o Oil/Water Emulsions	37% (15/41)	48% (12/25)	52% (13/25)	0% (0/0)	0% (0/0)	0% (0/0)	80% (4/5)	10% (1/5)	0% (0/5)	82% (9/11)	18% (2/11)
w/o Alcohols and Surfactant Formulations	48% (13/27)	100% (7/7)	0% (0/7)	50% (1/2)	50% (1/2)	0% (0/2)	44% (4/9)	11% (1/9)	44% (4/9)	56% (5/9)	44% (4/9)
w/o Alcohols and Oil/Water Emulsions	47 (16/34)	43 (10/23)	57 (13/23)	50% (1/2)	50% (1/2)	0% (0/2)	40% (2/5)	60% (3/5)	0% (0/5)	50% (2/4)	50% (2/4)
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	78% (7/9)	100% (6/6)	0% (0/6)	50% (1/2)	50% (1/2)	0% (0/2)	100% (1/1)	0% (0/1)	0% (0/1)	-	-

1466 Abbreviations: EPA = U.S. Environmental Protection Agency; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane
 1467 ¹EPA classification system (EPA 1996) ²Severe = Category I ³Moderate = Category II ⁴Mild = Category III ⁵Not Labeled = Category IV.

1468 **Table 6-9 Accuracy of the HET-CAM Test Method (IS[A]) for Distinguishing EPA**
 1469 **Category IV from All Other Irritant Classes as Defined by the EPA**
 1470 **Classification System¹, with Exclusion of Discordant Chemical and Physical Classes**

HET-CAM Database	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Overall	60	78	47/60	91	41/45	40	6/15	60	9/15	9	4/45
w/o Alcohols	52	87	45/52	100	39/39	46	6/13	54	7/13	10	4/39
w/o Surfactant Formulations	35	80	28/35	100	24/24	29	4/14	82	9/11	17	4/24
w/o Oil/Water Emulsions	41	78	32/41	100	30/30	18	2/11	82	9/11	0	0/30
w/o Alcohols and Surfactant Formulations	27	81	22/27	100	18/18	44	4/9	56	5/9	44	4/18
w/o Alcohols and Oil/Water Emulsions	34	94	32/34	100	30/30	50	2/4	50	2/4	0	0/30
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	9	78	7/9	100	9/9	-	-	-	-	-	-

1471 Abbreviations: EPA = U.S. Environmental Protection Agency; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1472 ¹ EPA classification system (EPA 1996). Cat IV vs. Cat I/II/III.

1473 ²N = Number of substances included in this analysis/the total number of substances in the study.

1474 ³No. = Data used to calculate the percentage.

1475

1475 **Table 6-10 Evaluation of Under and Overprediction of the HET-CAM Test Method Using the EPA¹ Classification System**
 1476 **In Predicting Ocular Irritant Classes Compared to the *In Vivo* Rabbit Eye Test Method by Chemical Class or**
 1477 **Physical Property**

Category	N	Underprediction (<i>In Vivo/In Vitro</i>)						Overprediction (<i>In Vivo/In Vitro</i>)					
		I (Severe) ²			II (Moderate) ³		III (Mild) ⁴	II (Mod)	III (Mild)		IV (Not labeled)		
		IV	III	II	IV	III	IV	I	II	I	III	II	I
Overall	60	0% (0/25)	12% (3/25)	40% (10/25)	0% (0/2)	0% (0/2)	22% (4/18)	50% (1/2)	28% (5/18)	28% (5/18)	40% (6/15)	0% (0/18)	20% (3/18)
Chemical Class⁶													
Alcohol	8	0% (0/1)	0% (0/1)	0% (1/1)	-	-	0% (0/5)	-	40% (2/5)	60% (3/5)	50% (1/2)	0% (0/2)	50% (1/2)
Carboxylic acid	6	0% (0/4)	0% (0/4)	25% (1/4)	-	-	0% (0/2)	-	0% (0/2)	100% (2/2)	-	-	-
Organic salt	6	0% (0/6)	0% (0/6)	17% (1/6)	-	-	-	-	-	-	-	-	-
Properties of Interest													
Liquids	59	0% (0/25)	12% (3/25)	40% (10/25)	-	-	22% (4/18)	-	28% (5/18)	28% (5/18)	40% (6/15)	0% (0/15)	20% (3/15)
Solids	0	-	-	-	-	-	-	-	-	-	-	-	-
Pesticide	0	-	-	-	-	-	-	-	-	-	-	-	-
Surfactant-Total	25	0% (0/17)	18% (3/17)	59% (10/17)	-	-	0% (0/4)	-	25% (1/4)	0% (0/4)	50% (2/4)	0% (0/4)	0% (0/4)
-nonionic	-	-	-	-	-	-	-	-	-	-	-	-	-
-anionic	-	-	-	-	-	-	-	-	-	-	-	-	-
-cationic	--	-	-	-	-	-	-	-	-	-	-	-	-
Oil/Water Emulsion	18	0% (0/1)	0% (0/1)	0% (0/1)	-	-	50% (4/8)	-	25% (2/8)	13% (1/8)	33% (3/9)	0% (0/9)	22% (2/9)
pH-Total	0	-	-	-	-	-	-	-	-	-	-	-	-
-acidic (pH < 7.0)	-	-	-	-	-	-	-	-	-	-	-	-	-
-basic (pH > 7.0)	-	-	-	-	-	-	-	-	-	-	-	-	-

1478

1479 Abbreviations: EPA classification system (EPA 1996); HET-CAM = Hen's Egg Test - Chorioallantoic Membrane
1480 ¹ EPA classification system (EPA 1996)
1481 ² Severe = Category I.
1482 ³ Moderate = Category II.
1483 ⁴ Mild = Category III.
1484 ⁵ Non-irritant = Category IV.
1485 ⁶ Chemical classes included in this table are represented by at least five substances tested in the HET-CAM test method and assignments are based upon MeSH
1486 categories (www.nlm.nih.gov/mesh) as defined in Appendix A.
1487

1488 **6.1.3 EU Classification System: HET-CAM Test Method Accuracy**

1489 Five studies (Bagley et al. 1992; Gettings et al. 1994; Kojima et al. 1995; Gettings et al.
1490 1996; Hagino et al. 1999) contained HET-CAM test method data on 63 substances, 59 of
1491 which had sufficient *in vivo* data to be assigned an ocular irritancy classification according to
1492 the EU classification system (EU 2001) (see **Appendix C**). Based on results from *in vivo*
1493 rabbit eye experiments, 38% (24/63) were classified as Category R41 (i.e., severe irritants),
1494 3% (2/63) were classified as Category R36 (i.e., moderate irritants), 51% (32/63) were
1495 classified as Not Labeled. The remaining 6% (4/63) of substances could not be classified
1496 according to the EU classification system due to the lack of adequate animal data and are so
1497 noted in **Appendix C**.

1498 **6.1.3.1 Identification of Category R41 Substances (Ocular Corrosives/Severe Irritants)**

1499 The HET-CAM test method correctly identified 50% (12/24) of the Category R41 substances
1500 (**Table 6-11**). Among the remaining 50% (12/24) R41 substances that were underpredicted
1501 by HET-CAM, 42% (10/24) were classified as Category R36, and 8% (2/24) were classified
1502 as not labeled.

1503 **6.1.3.2 Identification of Category R36 Substances (Moderate Ocular Irritants)**

1504 For the two substances that could be evaluated, the HET-CAM test method correctly
1505 identified 50% (1/2) as R36 while 50% (1/2) were overpredicted and 0% (0/2) were
1506 underpredicted (**Table 6-11**).

1507 **6.1.3.3 Identification of Not Labeled Substances**

1508 For the 32 substances that could be evaluated, the HET-CAM test method correctly identified
1509 31% (10/32) as substances not labeled as irritants while 69% (22/32) were overpredicted
1510 (**Table 6-11**).

1511 **6.1.3.4 Ability to Distinguish Not Labeled Substances from All Other Classes**

1512 In addition to evaluating the ability of the HET-CAM test method to identify each individual
1513 ocular hazard category according to the EU classification system, ICCVAM also evaluated
1514 the ability of the HET-CAM test method to distinguish ocular substances not labeled as

1515 irritants from all irritant classes³. Using this approach of identifying substances not labeled as
1516 irritants from all other classes for the 60 substances considered, the HET-CAM test method
1517 has an overall accuracy of 62% (36/58), a sensitivity of 100% (26/26), a specificity of 31%
1518 (10/32), a false positive rate of 69% (22/32), and a false negative rate of 0% (0/26) (**Table 6-**
1519 **12**).

1520 As detailed below, the results from each individual study were also evaluated separately.

1521 **Gettings et al. (1994):** Based upon the *in vivo* rabbit data, 14 substances were assigned an
1522 EU classification. The HET-CAM test method, by comparison, has an accuracy of 64%
1523 (9/14), sensitivity of 100% (1/1), specificity of 62% (8/14), false positive rate of 33% (1/3),
1524 and a false negative rate of 0% (0/1) (**Table 6-12**).

1525 **Gettings et al. (1996):** Based upon the *in vivo* rabbit data, 17 substances were assigned a EU
1526 classification. The HET-CAM test method, by comparison, has an accuracy of 82% (14/17),
1527 sensitivity of 100% (14/14), specificity of 67% (2/3), false positive rate of 50% (2/4), and a
1528 false negative rate of 0% (0/8) (**Table 6-12**).

1529 **Hagino et al. (1999):** Based upon the *in vivo* rabbit data, 14 substances were assigned a EU
1530 classification. The HET-CAM test method, by comparison, has an accuracy of 50% (8/14),
1531 sensitivity of 100% (8/8), specificity of 0% (0/6), false positive rate of 100% (6/6), and a
1532 false negative rate of 0% (0/26) (**Table 6-12**).

1533 6.1.3.6 Performance of the HET-CAM Test Method with Discordant Classes Excluded

1534 Because a specific analysis method is the focus of the evaluation of HET-CAM for
1535 identifying all hazard categories (the IS[A] analysis method), separate analyses were also
1536 conducted for all chemical classes and specific physical properties of interest represented in
1537 this database of 60 substances by at least five substances (i.e., surfactant based formulations,
1538 oil/water emulsions, and alcohols).

1539 Given the proportion of substances in the HET-CAM IS(A) database represented by these
1540 chemical and product classes (i.e., 85% [51/60] of the substances are included in one of these

³ ICCVAM (2006) provides an evaluation of the HET-CAM test method for distinguishing ocular corrosives and severe irritants from all other classes. Since the database of HET-CAM test method results has not changed, this analysis has not been repeated here.

1541 three categories), separate analyses without these discordant substances are not particularly
1542 informative. However, because of the associated discordance with each type, overall
1543 performance, particularly for the ocular corrosive and severe irritant category can be
1544 improved by excluded certain product types (see **Table 6-13**). The results indicate that
1545 alcohols tend to be overpredicted by HET-CAM (i.e., 83% [5/6] of alcohols classified as Not
1546 Labeled based on Draize test results [and depending on the classification system used] were
1547 overpredicted by HET-CAM by at least one hazard category). Similarly, 53% (9/17) of the
1548 oil/water emulsions were overpredicted by HET-CAM by at least one hazard category. By
1549 comparison, surfactant formulations classified as R41 based on Draize results tended to be
1550 underpredicted by HET-CAM (75% [12/16] were underpredicted by HET-CAM as Category
1551 R36). However, none of these substances were underpredicted as Not Labeled.

1552 When the ability of the HET-CAM test method to distinguish Not Labeled substances from
1553 all irritant classes was evaluated with the specific chemical and product classes removed, the
1554 greatest improvement in false positive rate occurred when alcohols and surfactant
1555 formulations were excluded (the false positive rate decreased from 69% [22/32] to 58%
1556 [11/19]). However, because the false negative rate for the overall database is 0% (0/31), this
1557 rate remained constant regardless of which chemical or product class(es) that were excluded
1558 (**Table 6-14**).

1559 Further analysis of substances for which hazard classification was underpredicted by HET-
1560 CAM according to chemical class indicated that carboxylic acids had the highest proportion
1561 of underpredicted substances (25% [1/4]). Because the entire HET-CAM IS(A) database is
1562 made up of liquid substances, the physical form of underpredicted substances was liquids.
1563 Among the 16 R41 surfactant formulations, 75% (12/16) were underpredicted (**Table 6-10**).

1564 According to the EU classification system, the most overpredicted substances (false
1565 positives) were alcohols, which overpredicted 83% (5/6) alcohols. Because the entire HET-
1566 CAM IS(A) database is made up of liquid substances, the physical form of underpredicted
1567 substances was liquids. One of the Not Labeled surfactant formulations tested in HET-CAM
1568 was overpredicted (**Table 6-10**).

1569

1570 **Table 6-11 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1571 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the EU Classification System¹, by Study and**
 1572 **Overall**

Data Source	Overall Correct Classification	Severe ²		Moderate ³			Mild			Not Labeled ⁴	
		actual	under	over	actual	under	over	actual	under	over	actual
Gettings et al. (1994)	64% (9/14)	100% (1/1)	0% (0/1)	0% (0/0)	0% (0/0)	0% (0/0)	NA	NA	NA	38% (5/13)	62% (8/13)
Gettings et al. (1996)	35% (6/17)	29% (4/14)	71% (10/14)	0% (0/0)	0% (0/0)	0% (0/0)	NA	NA	NA	33% (1/3)	67% (2/3)
Hagino et al. (1999)	50% (7/14)	100% (7/7)	0% (0/0)	100% (1/1)	0% (0/1)	0% (0/1)	NA	NA	NA	100% (6/6)	0% (0/6)
Overall⁵	40% (23/58)	50% (12/24)	50% (12/24)	50% (1/2)	50% (1/2)	0% (0/2)	NA	NA	NA	69% (22/32)	31% (10/32)

1573 Abbreviations: EU = European Union; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane
 1574 NA = Not Applicable
 1575 ¹EU classification system (EU 2001)
 1576 ²Severe = R41.
 1577 ³Moderate = Category 2A (GHS), Category II (EPA), and R36 (EU).
 1578 ⁴Not Labeled = Not Labeled.
 1579 ⁵Overall data set includes one additional test substance from Bagley et al. (1992) and two from Kojima et al. (1995) that were not included as individual data
 1580 sources.
 1581

1581 **Table 6-12 Accuracy of the HET-CAM Test Method (IS[A]) for Distinguishing Substances not labeled as irritants from All**
 1582 **Other Irritant Classes as Defined by the EU Classification System¹, by Study and Overall**

Data Source	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Gettings et al. (1994)	14	64	9/14	100	1/1	62	8/13	38	5/13	0	0/1
Gettings et al. (1996)	17	82	14/17	100	14/14	67	2/3	33	1/3	0	0/14
Hagino et al. (1999)	14	50	8/14	100	8/8	0	0/6	100	6/6	0	0/8
Overall⁴	58	62	36/58	100	26/26	31	10/32	69	22/32	0	0/26

1583 Abbreviations: EU = European Union; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1584 ¹EU classification system (EU 2001). NL vs. R41/R36.

1585 ²N = Number of substances included in this analysis/the total number of substances in the study.

1586 ³No. = Data used to calculate the percentage.

1587 ⁴Overall data set includes one additional test substance from Bagley et al. (1992) and two from Kojima et al. (1995) that were not included as individual data
 1588 sources.

1589
 1590

1590 **Table 6-13 Evaluation of the Performance of the HET-CAM Test Method (IS[A]) In Predicting Ocular Irritant Classes**
 1591 **Compared to the *In Vivo* Rabbit Eye Test Method, as Defined by the EU Classification System¹, with Exclusion**
 1592 **of Discordant Chemical and Physical Classes**

HET-CAM Database	Overall Correct Classification	Severe ²		Moderate ³			Mild ⁴			Not Labeled ⁵	
		Actual	Under	Over	Actual	Under	Over	Actual	Under	Over	Actual
Overall	40% (23/58)	50% (12/24)	50% (12/24)	50% (1/2)	50% (1/2)	0% (0/2)	NA	NA	NA	69% (22/32)	31% (10/32)
w/o Alcohols	42% (21/50)	45% (10/22)	55% (12/22)	50% (1/2)	0% (0/2)	50% (1/2)	NA	NA	NA	62% (16/26)	38% (10/26)
w/o Surfactant Formulations	47% (16/34)	100% (8/8)	0% (0/8)	100% (1/1)	0% (0/1)	0% (0/1)	NA	NA	NA	68% (17/25)	32% (8/25)
w/o Oil/Water Emulsions	36% (14/39)	48% (11/23)	52% (12/23)	0% (0/1)	100% (1/1)	0% (0/1)	NA	NA	NA	87% (13/15)	0% (0/24)
w/o Alcohols and Surfactant Formulations	54% (14/26)	100% (6/6)	0% (0/6)	100% (0/1)	0% (0/1)	0% (0/1)	NA	NA	NA	58% (11/19)	42% (8/19)
w/o Alcohols and Oil/Water Emulsions	37% (12/32)	43% (9/21)	57% (12/21)	50% (1/2)	50% (1/2)	0% (0/2)	NA	NA	NA	78% (7/9)	22% (2/9)
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	62% (5/8)	100% (5/5)	0% (0/5)	100% (0/1)	0% (0/1)	0% (0/1)	NA	NA	NA	100% (2/2)	0% (0/2)

1593 Abbreviations: EU = European Union; HET-CAM = Hen’s Egg Test – Chorioallanotic Membrane; NA = Not applicable

1594 ¹EU classification system (EU 2001) ²Severe = R41 ³Moderate = R36 ⁴Mild = NA ⁵Not Labeled = Not Classified.

1595

1596 **Table 6-14 Accuracy of the HET-CAM Test Method (IS[A]) for Distinguishing Substances not labeled as irritants from All**
 1597 **Other Irritant Classes as Defined by the EU Classification System¹, with Exclusion of Discordant Chemical and**
 1598 **Physical Classes**

HET-CAM Database	N ²	Accuracy		Sensitivity		Specificity		False Positive Rate		False Negative Rate	
		%	No. ³	%	No.	%	No.	%	No.	%	No.
Overall	58	62	36/58	100	26/26	31	10/32	69	22/32	0	0/26
w/o Alcohols	50	42	21/50	100	24/24	38	10/26	62	16/26	0	0/24
w/o Surfactant Formulations	34	64	16/25	100	9/9	32	8/25	68	17/25	0	0/9
w/o Oil/Water Emulsions	39	67	26/39	100	2/24	13	2/15	87	13/15	0	0/24
w/o Alcohols and Surfactant Formulations	26	65	17/26	100	7/7	42	8/19	58	11/19	0	0/7
w/o Alcohols and Oil/Water Emulsions	32	78	25/32	100	23/23	22	2/9	78	7/9	0	0/23
w/o Alcohols, Surfactant Formulations, and Oil/Water Emulsions	8	62	5/8	100	6/6	0	0/2	100	2/2	0	0/6

1599 Abbreviations: EU = European Union; HET-CAM = Hen’s Egg Test – Chorioallantoic Membrane

1600 ¹ EU classification system (EU 2001). NV vs. R41/R36.

1601 ²N = Number of substances included in this analysis/the total number of substances in the study.

1602 ³No. = Data used to calculate the percentage.

1603 **Table 6-15 Evaluation of the Performance of the HET-CAM Test Method Using the**
 1604 **EU¹ Classification System In Predicting Ocular Irritant Classes**
 1605 **Compared to the *In Vivo* Rabbit Eye Test Method by Chemical Class or**
 1606 **Physical Property**

Category	N	Underprediction (<i>In Vivo/In Vitro</i>)			Overprediction (<i>In Vivo/In Vitro</i>)		
		R41 (Severe) ²		R36 (Moderate) ³	R36 (Mod) ³	NL (Not Labeled) ⁴	
		NL	R36	NL	R41	R36	R41
Overall	61	7% (2/28)	43% (12/28)	50% (1/2)	0% (0/2)	16% (5/31)	23% (7/31)
Chemical Class⁵							
Alcohol	8	0% (0/2)	0% (0/2)	50% (1/2)	0% (0/2)	33% (2/6)	50% (3/6)
Carboxylic Acid	5	0% (0/4)	25% (1/4)	-	-	0% (0/1)	100% (1/1)
Organic salt	2	0% (0/5)	20% (1/5)	100% (1/1)	0% (0/1)	-	-
Properties of Interest							
Liquids	58	8% (2/24)	42% (10/24)	50% (1/2)	50% (1/2)	16% (5/32)	25% (8/32)
Solids	0	-	-	-	-	-	-
Pesticide	0	-	-	-	-	-	-
Surfactant-Total	24	0% (0/16)	62% (12/16)	100% (1/1)	0% (0/1)	14% (1/7)	0% (0/7)
-nonionic	-	-	-	-	-	-	-
Anionic	-	-	-	-	-	-	-
Cationic	-	-	-	-	-	-	-
Oil/Water Emulsion	18	0% (0/1)	0% (0/1)	-	-	35% (6/17)	18% (3/17)
pH-Total	0	-	-	-	-	-	-
-acidic (pH < 7.0)	-	-	-	-	-	-	-
-basic (pH > 7.0)	-	-	-	-	-	-	-

1607

1608 Abbreviations: GHS = Globally Harmonized System; HET-CAM = Hen's Egg Test – Chorioallantoic
 1609 Membrane

1610 ¹EU classification system (EU 2001)

1611 ²Severe = Category R41 (EU).

1612 ³Moderate = Category R36 (EU).

1613 ⁴NL = Category NL (EU).

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1617 **7.0 HET-CAM Test Method Reliability**

1618 An assessment of test method reliability (intralaboratory repeatability and intra- and inter-
1619 laboratory reproducibility) is an essential element of any evaluation of the performance of an
1620 alternative test method (ICCVAM 2003). Quantitative and qualitative evaluations of HET-
1621 CAM test method reliability have been conducted previously (ICCVAM 2006a). Since the
1622 database used for the current evaluation of the HET-CAM test method has not changed, the
1623 quantitative evaluation of test method reliability remains unchanged. However, additional
1624 qualitative analyses of test method reproducibility were conducted to evaluate the extent of
1625 agreement of HET-CAM hazard classifications among the laboratories.

1626 **7.1 Interlaboratory Reproducibility of Hazard Classification Category Using the** 1627 **GHS Classification System**

1628 Fifteen of 17 substances tested had sufficient data to be classified using the GHS system (UN
1629 2003). Of four not labeled and three Category 2B substances, none (0%; 0/4 and 0%; 0/3,
1630 respectively) were correctly identified by HET-CAM. None of the 15 GHS-classified
1631 substances tested were classified Category 2A by HET-CAM. However, eight substances
1632 classified as GHS Category 1 were correctly identified by HET-CAM (100%; 8/8).

1633 The extent of agreement of calls among laboratories between irritants (i.e., Category 1, 2A,
1634 and 2B = “+” and Not Labeled = “-“) regardless of the individual hazard classification was
1635 evaluated by comparison of *in vivo* and *in vitro* data (**Table 7-1**).

- 1636 • For 11 substances, there was 100% agreement among the *in vivo* and *in vitro*
1637 calls (i.e., “+/+”).
- 1638 • For four substances that were overpredicted *in vitro* (i.e., “+/-“), there was
1639 100% agreement for 3/4 (75%) of the substances and 80% agreement for 1/4
1640 (25%) of the substances.
- 1641 • For two substances that could not be assigned GHS classification, there was
1642 100% agreement on the *in vitro* classifications (i.e., “?/+”).
- 1643 • An assessment of the agreement between laboratories for substances not
1644 labeled as irritants compared to all other classes could not be made because

1645 there were no not labeled calls obtained using HET-CAM. However, overall,
1646 there was 100% agreement for 16/17 (94%) of substances and 80% agreement
1647 for 1/17 (6%) of substances⁴.

• ⁴ Because the database of HET-CAM test method results has not changed, the qualitative evaluation of reproducibility presented in ICCVAM (2006) is not repeated here.

1648 **Table 7-1 Interlaboratory Variability of Hagino et al. (1999) In Predicting Not Labeled Ocular Substances or**
 1649 **Corrosive/Severe/Moderate/Mild Irritants as Defined by the GHS Classification System**

Report	Anal ¹	Classification (<i>In Vivo/In Vitro</i>) ²	# of Labs	N ³	Substances with 100% Agreement among Labs	Substances with 80% Agreement among Labs
Hagino et al. (1999)	IS(A)	+/+	5	11	11 (100%)	0
		+/-	5	0	0	0
		-/+	5	4	3 (75%)	1 (25%)
		-/-	5	0	0	0
		?/-	5	0	0	0
		?/+	5	2	2 (100%)	0
		Total	5	17	16 (94%)	1 (6%)

1650

1651 Abbreviation: GHS = Globally Harmonized System (UN 2007)

1652 ¹Anal = analysis method used to transform the sample data into HET-CAM scores. IS(A) = method described in Luepke (1985); IS(B)-10 and IS(B)-100 =
 1653 method described in Kalweit et al. (1987).

1654 ²A “+” indicates that the substance was assigned an overall classification of corrosive or a severe irritant (Category 1); a “-“ indicates that the substance was
 1655 assigned an overall classification of nonsevere irritant (Category 2A or 2B) or not labeled; a “?” indicates that, due to the lack of appropriate *in vivo* data (e.g.,
 1656 studies were terminated too early to assess reversibility of effects; insufficient dose volume), a GHS classification could not be made. See **Section 6.1** for a
 1657 description of the rules followed to classify the ocular irritancy of test substances tested multiple times *in vitro*.

1658 ³N indicates number of substances.

1659 ⁴Number in parentheses indicates percentage of tested chemicals.

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1671 The extent of agreement among the five laboratories for a test substance was also evaluated
1672 based on prediction of the individual GHS hazard category (**Table 7-2**).

- 1673 • Of four not labeled substances, all were overpredicted with 100% agreement
1674 by 3/4 (75%) laboratories and 80% agreement by 1/4 (25%) laboratories.
- 1675 • Of the three Category III substances, all were overpredicted with 100% (3/3)
1676 agreement among the five laboratories.
- 1677 • No Category 2A substances were identified.
- 1678 • All eight substances were correctly predicted as Category 1 substances with
1679 100% agreement for 5/8 (63%) substances, 80% agreement for 1/8 (13%)
1680 substances, and 60% agreement for 2/8 (25%) substances.

1681 None (0/8 [0%]), of the Category 1 substances were incorrectly identified. However, all four
1682 not labeled substances and the three Category 2B substances, 4/4 (100%) and 3/3 (100%),
1683 respectively, were incorrectly identified (**Table 7-2**).

- 1684 • There was no agreement among the five participating laboratories to
1685 incorrectly classify any 0/8 (0%) of the GHS Category 1 substances, since all
1686 were correctly classified. There was 100% agreement to overclassify 3/3
1687 (100%) of the GHS Category 2B substances, 100% agreement to overclassify
1688 3/4 substances and 80% agreement to overclassify 1/4 of the not labeled
1689 substances (**Table 7-2**).

1690 **7.2 Interlaboratory Reproducibility of Hazard Classification Category Using the** 1691 **EPA Classification System**

1692 Fifteen of 17 substances tested had sufficient data to be classified using the EPA system
1693 (EPA 2003). Of two not labeled, five Category III, and one Category II substances, none
1694 (0%, 0/2, 0%, 0/5, and 0%, 0/1, respectively) were correctly identified by HET-CAM.

1695 However, seven substances classified as EPA Category I were correctly identified by HET-
1696 CAM (100%; 7/7).

1697 **Table 7-2 Evaluation of the Interlaboratory Variability of Hagino et al. (1999) in Predicting Ocular Irritant Classes**
 1698 **Compared to the *In Vivo* Rabbit Eye Test Method as Defined by the GHS Classification System**

<i>In vivo</i> Classification (No.) ¹	Classification (<i>in vitro</i>)	Number of Substances	Number of Testing Laboratories	Substances with 100% Agreement Among Laboratories (%)	Substances with 80% Agreement Among Laboratories (%)	Substances with 60% Agreement Among Laboratories (%)
NL (4)	Actual	0	5	0	0	0
	Over	4	5	3 (75%)	1 (25%)	0
2B (3)	Under	0	5	0	0	0
	Actual	0	5	0	0	0
	Over	3	5	3 (100%)	0	0
2A (0)	Under	0	5	0	0	0
	Actual	0	5	0	0	0
	Over	0	5	0	0	0
1 (8)	Under	0	5	0	0	0
	Actual	8	5	5 (63%)	1 (13%)	2 (25%)

Abbreviations: GHS = United Nations Globally Harmonized System of Classification and Labelling of Chemicals

¹Due to the lack of appropriate *in vivo* data (e.g., studies were terminated too early to assess reversibility of effects), a GHS classification (UN 2007) could not be made for two substances. See **Section 6.1** for a description of the rules followed to classify the ocular irritancy of test substances tested multiple times *in vitro*.

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1714 The extent of agreement of calls among laboratories between irritants (i.e., Category I, II, and
1715 III = “+” and Category IV = “-“) regardless of the individual hazard classification was
1716 evaluated by comparison of *in vivo* and *in vitro* data (**Table 7-3**).

- 1717 • For 13 substances, there was 100% agreement among the *in vivo* and *in vitro*
1718 calls (i.e., “+/+”).
- 1719 • For two substances that were overpredicted *in vitro* (i.e., “+/-“), there was
1720 60% agreement for 2/2 (100%) of the substances.
- 1721 • For two substances that could not be assigned an EPA classification, there was
1722 100% agreement on the *in vitro* classifications (i.e., “?/+”).
- 1723 • An assessment of the agreement between laboratories for substances not
1724 labeled as irritants compared to all other classes could not be made because
1725 there were no not labeled calls obtained using HET-CAM. However, overall,
1726 there was 100% agreement for 14/17 (82%) of substances and 60% agreement
1727 for 3/17 (18%) of substances⁵.

1728 The extent of agreement among the five laboratories for a test substance was also evaluated
1729 based on prediction of the individual EPA hazard category (**Table 7-4**).

- 1730 • Of two not labeled substances, all were overpredicted with 100% agreement
1731 by 1/2 (50%) of the laboratories and 80% agreement by 1/2 (50%) of the
1732 laboratories.
- 1733 • Of the three Category III substances, all were overpredicted with 100%
1734 agreement among the five laboratories.
- 1735 • One Category II substances was overpredicted with 100% agreement among
1736 the five laboratories.
- 1737 • All seven substances were correctly predicted as Category I substances with
1738 100% agreement for 5/7 (71%) of the substances and 80% agreement for 2/7
1739 (29%) of the substances.

• ⁵ Because the database of HET-CAM test method results has not changed, the qualitative evaluation of reproducibility presented in ICCVAM (2006) is not repeated here.

1740 **Table 7-3 Interlaboratory Variability of Hagino et al. (1999) In Predicting Not Labeled Ocular Substances or**
 1741 **Corrosive/Severe/Moderate/Mild Irritants as Defined by the EPA Classification System**

Report	Anal ¹	Classification (<i>In Vivo/In Vitro</i>) ²	# of Labs	N ³	Substances with 100% Agreement among Labs	Substances with 60% Agreement among Labs
Hagino et al. (1999)	IS(A)	+/+	5	13	13 (100%)	0
		+/-	5	0	0	0
		-/+	5	2	0	2 (100%)
		-/-	5	0	0	0
		?/-	5	0	0	0
		?/+	5	2	1 (50%)	1 (50%)
		Total	5	17	14 (82%)	3 (18%)

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1743 Abbreviation: EPA = U.S. Environmental Protection Agency (EPA 2003)

1744 ¹Anal = analysis method used to transform the sample data into HET-CAM scores. IS(A) = method described in Luepke (1985); IS(B)-10 and IS(B)-100 =
 1745 method described in Kalweit et al. (1987).

1746 ²A “+” indicates that the substance was assigned an overall classification of corrosive or a severe irritant (Category I); a “-“ indicates that the substance was
 1747 assigned an overall classification of nonsevere irritant (Category II or II) or not labeled; a “?” indicates that, due to the lack of appropriate *in vivo* data (e.g.,
 1748 studies were terminated too early to assess reversibility of effects; insufficient dose volume), a EPA classification could not be made. See **Section 6.1** for a
 1749 description of the rules followed to classify the ocular irritancy of test substances tested multiple times *in vitro*.

1750 ³N indicates number of substances.

1751 ⁴Number in parentheses indicates percentage of tested chemicals.

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1752 **Table 7-4 Evaluation of the Interlaboratory Variability of Hagino et al. (1999) In Predicting Ocular Irritant Classes**
 1753 **Compared to the *In Vivo* Rabbit Eye Test Method as Defined by the EPA Classification System**

<i>In vivo</i> Classification (No.) ¹	Classification (<i>in vitro</i>)	Number of Substances	Number of Testing Laboratories	Substances with 100% Agreement Among Laboratories (%)	Substances with 80% Agreement Among Laboratories (%)
IV (2)	Actual	0	5	0	0
	Over	2	5	1 (50%)	1 (50%)
III (5)	Under	0	5	0	0
	Actual	0	5	0	0
	Over	5	5	5 (100%)	0
II (1)	Under	0	5	0	0
	Actual	0	5	0	0
	Over	1	5	1 (100%)	0
I (7)	Under	0	5	0	0
	Actual	7	5	5 (71%)	2 (29%)

1754 Abbreviation: EPA = U.S. Environmental Protection Agency (EPA 2003)

1755 ¹Due to the lack of appropriate *in vivo* data (e.g., studies were terminated too early to assess reversibility of effects), an EPA classification (EPA 2003) could
 1756 not be made for two substances. See **Section 6.1** for a description of the rules followed to classify the ocular irritancy of test substances tested multiple times
 1757 *in vitro*.

1758 None (0/7 [0%]), of the Category 1 substances were incorrectly identified. However, all two
1759 not labeled, five Category III, and one Category II substances (i.e., 2/2 [100%], 5/5 [100%],
1760 and 1/1 [100%], respectively, were incorrectly identified by HET-CAM (**Table 7-4**).

1761 • There was no agreement among the five participating laboratories to
1762 incorrectly classify any 0/7 (0%) of the EPA Category I substances, since all
1763 were correctly classified. There was 100% agreement to overclassify 1/2
1764 (50%) and 80% agreement to overclassify 1/2 (50%) of the EPA substances
1765 not labeled as irritants. For Category III substances, there was 100%
1766 agreement to overclassify 5/5 substances. For the Category II substance, there
1767 was 100% agreement to overclassify it.

1768 **7.3 Interlaboratory Reproducibility of Hazard Classification Category Using the EU** 1769 **Classification System**

1770 Fifteen of 17 substances tested had sufficient data to be classified using the EU system (EU
1771 2001). Of seven not labeled, one Category R36, and one Category R36 substances, none (0%,
1772 0/7, 0%, 0/1, and 0%, 0/2, respectively) were correctly identified by HET-CAM. However,
1773 seven substances classified as EU Category I were correctly identified by HET-CAM (100%;
1774 7/7).

1775 The extent of agreement of calls among laboratories between irritants (i.e., Category R41,
1776 R36 = “+” and not labeled = “-“) regardless of the individual hazard classification was
1777 evaluated by comparison of *in vivo* and *in vitro* data (**Table 7-5**).

1778 • For 8 substances, there was 100% agreement among the *in vivo* and *in vitro*
1779 calls for 5/8 (63%), 80% agreement for 2/8 (25%), and 60% agreement for 1/8
1780 (13%).

1781 • For seven substances that were overpredicted *in vitro* (i.e., “+/-“), there was
1782 100% agreement for 6/7 (86%) and 80% agreement for 1/7 (14%) of the
1783 substances.

1784 • For two substances that could not be assigned an EU classification, there was
1785 100% agreement on the *in vitro* classifications (i.e., “?/+).

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- An assessment of the agreement between laboratories for substances not labeled as irritants compared to all other classes could not be made because there were no not labeled calls obtained using HET-CAM.

1789 **Table 7-5 Interlaboratory Variability of Hagino et al. (1999) In Predicting Not Labeled Ocular Substances or**
 1790 **Corrosive/Severe/Moderate/Mild Irritants as Defined by the EU Classification System**

Report	Anal ¹	Classification (<i>In Vivo/In Vitro</i>) ²	# of Labs	N ³	Substances with 100% Agreement among Labs	Substances with 80% Agreement among Labs	Substances with 60% Agreement among Labs
Hagino et al. (1999)	IS(A)	+/+	5	8	5 (63)	2 (25)	1 (13)
		+/-	5	0	0	0	0
		-/+	5	7	6 (86)	1 (14)	0
		-/-	5	0	0	0	0
		?/-	5	0	0	0	0
		?/+	5	2	2 (100)	0	0
		Total	5	17	13 (76)	3(18)	1 (6)

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1792 Abbreviation: EU = European Union (EU 2001).

1793 ¹Anal = analysis method used to transform the sample data into HET-CAM scores. IS(A) = method described in Luepke (1985); IS(B)-10 and IS(B)-100 =
 1794 method described in Kalweit et al. (1987).

1795 ²A “+” indicates that the substance was assigned an overall classification of corrosive or a severe irritant (Category R41); a “-“ indicates that the substance was
 1796 assigned an overall classification of nonsevere irritant (Category R36) or not labeled; a “?” indicates that, due to the lack of appropriate *in vivo* data (e.g., studies
 1797 were terminated too early to assess reversibility of effects; insufficient dose volume), a EU classification could not be made. See **Section 6.1** for a description of
 1798 the rules followed to classify the ocular irritancy of test substances tested multiple times *in vitro*.

1799 ³N indicates number of substances.

1800 ⁴Number in parentheses indicates percentage of tested chemicals.

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1801 **Table 7-6 Evaluation of the Interlaboratory Variability of Hagino et al. (1999) In Predicting Ocular Irritant Classes**
 1802 **Compared to the *In Vivo* Rabbit Eye Test Method as Defined by the EU Classification System**

<i>In vivo</i> Classification (No.) ¹	Classification (<i>in vitro</i>)	Number of Substances	Number of Testing Laboratories	Substances with 100% Agreement Among Laboratories (%)	Substances with 80% Agreement Among Laboratories (%)	Substances with 60% Agreement Among Laboratories (%)
NL (7)	Actual	0	5	0	0	0
	Over	7	5	6 (86%)	1 (14%)	0
R36 (1)	Under	0	5	0	0	0
	Actual	0	5	0	0	0
R41 (7)	Over	1	5	1 (100%)	0	0
	Under	0	5	0	0	0
	Actual	7	5 ²	5 (71%)	1 (14%)	1 (14%)

1803 Abbreviation: EU = European Union (EU 2001).

1804 ¹Due to the lack of appropriate *in vivo* data (e.g., studies were terminated too early to assess reversibility of effects), a EU classification (EU 2001) could not
 1805 be made for two substances. See **Section 6.1** for a description of the rules followed to classify the ocular irritancy of test substances tested multiple times *in*
 1806 *vitro*.

1807 The extent of agreement among the five laboratories for a test substance was also evaluated
1808 based on prediction of the individual EPA hazard category (**Table 7-6**).

1809 • Of seven not labeled substances, all were overpredicted with 100% agreement
1810 by 6/7 (86%) of the laboratories and 80% agreement by 1/7 (14%) of the
1811 laboratories.

1812 • The one R36 substance was overpredicted with 100% agreement among the
1813 five laboratories.

1814 • Seven Category R41 substances were overpredicted with 100% agreement
1815 among the five laboratories for 5/7 (71%), 80% agreement for 1/7 (14%), and
1816 60% agreement for 1/7 (14%) of the substances.

1817 None, 0/7 (0%), of the Category R41 substances were incorrectly identified. However, all
1818 seven not labeled, one Category R36, and seven Category R41 substances (i.e., 7/7 (100%),
1819 1/1 (100%), and 7/7 (100%), respectively, were incorrectly identified by HET-CAM (**Table**
1820 **7-6**).

1821 • There was no agreement among the five participating laboratories to
1822 incorrectly classify any 0/7 (0%) of the EU Category R41 substances, since all
1823 were correctly classified. There was 100% agreement to overclassify 6/7
1824 (86%) and 80% agreement to overclassify 1/7 (14%) of the EPA substances
1825 not labeled as irritants. For Category R36 substances, there was 100%
1826 agreement to overclassify 1/1 substances.

1827 **7.4 Common Chemical or Product Classes Among Test Substances with Discordant** 1828 **Interlaboratory Results Using the GHS Classification System**

1829 There were insufficient data with which to determine the effect of discordant chemicals on
1830 the interlaboratory analyses.

1831 **8.0 Test Method Data Quality**

1832 The database used in this assessment did not change from that used in the previous
1833 assessment of the ability of the HET-CAM test method to identify ocular corrosives and
1834 severe irritants. The evaluation of HET-CAM test method data quality is detailed in
1835 ICCVAM (2006a).

1836 **9.0 Other Scientific Reports and Reviews**

1837 Four additional studies were identified in the peer-reviewed literature over the period 2005 to
1838 2009 that contained HET-CAM data (Debbasch et al. 2005; Vinardell and Mitjans, 2006;
1839 Mehling et al. 2007; Mancebo et al. 2008). From these studies, seven test substances were
1840 identified with *in vitro* scores and *in vivo* data using the Draize rabbit eye test. However, the
1841 Draize rabbit eye test data and HET-CAM results for all seven test substances were
1842 previously included in the accuracy analyses reported in the ICCVAM BRD (2006a). As
1843 such, they have in turn already been considered in the current evaluation.

1844 In Debbasch et al. (2005), 12 coded make-up removers were tested in the HET-CAM, BCOP,
1845 and the corneal epithelial cell line (CEPI) test methods, and a clinical in-use test under
1846 ophthalmological control after their application to the external eyelid. Three hundred
1847 microliter of undiluted test product was applied to the chorioallantoic membrane of nine-day-
1848 old fertilized eggs (White Leghorn chicken, four per product). Corneal opacity was
1849 determined using an adapted spectrophotometer and barrier disruption by fluorescein uptake
1850 using OD490 nm. *In vitro* scores were classified according to Gautheron et al. (1994) and
1851 Harbell and Curren (1998), but no *in vivo* rabbit eye data were reported, and these data have
1852 not been obtained. For this reason, the results from this study were not included in the HET-
1853 CAM performance analyses detailed in this BRD.

1854 In Vinardell and Mitjans (2006), several industrial and laboratory solvents were tested for
1855 potential eye irritation using the HET-CAM test method. Using fertile eggs (Leghorn SA31,
1856 six per solvent), the substances to be tested were applied on the membrane in a constant
1857 volume of 0.3 ml at 37°C. Following application of the test substances, the membrane, blood
1858 vessels, and albumen were examined for 5 minutes. The time of appearance, in seconds, of
1859 each irritant effect was recorded. No *in vivo* rabbit reference data were reported, but the
1860 Draize rabbit eye test data and HET-CAM results for 7/9 of these substances were previously
1861 included in the accuracy analyses reported in the ICCVAM BRD (2006a). As such, they have
1862 in turn already been considered in the current evaluation.

1863 In Mehling et al. (2007), 18 proprietary surfactants were tested using the red blood cell test
1864 (RBC), HET-CAM and the SkinEthic™ ocular tissue model. Following the standard
1865 operating procedure (SOP) of the COLIPA project (INVITTOX protocol No. 96), three

1866 hundred microliter of test solution diluted in water were applied to the exposed CAM. The
1867 intensity of the subsequent reactions (i.e. hemorrhage, lysis, and coagulation) was semi-
1868 quantitatively assessed on a scale of 0 to 3. No *in vivo* rabbit reference data were reported in
1869 this study, therefore it was not included in the HET-CAM performance analysis detailed in
1870 this BRD.

1871 In Mancebo et al. (2008), 14 proprietary formulations generally used in agriculture were
1872 tested using the acute dermal toxicity and irritation/corrosion tests, the HET-CAM method,
1873 and the acute eye irritation/corrosion test. Three hundred microliters of each test substance
1874 was applied to the CAM of fertile eggs (Lohman, six per substance) and observed for a
1875 period of five minutes. The three endpoints for this study were hemorrhage, vessel lyses, and
1876 coagulation. Although *in vivo* rabbit eye data were reported in the study, the available raw
1877 data was not and as such the study was not included in the HET-CAM performance analyses
1878 detailed in this BRD.

1879 **10.0 How the HET-CAM Test Method Will Refine, Reduce, or Replace**
1880 **Animal Use**

1881 **10.1 How the HET-CAM Test Method Will Reduce, Refine, and Replace Animal Use**

1882 ICCVAM promotes the scientific validation and regulatory acceptance of new methods that
1883 refine, reduce, or replace animal use where scientifically feasible. Refinement, Reduction,
1884 and Replacement are known as the “Three Rs” of animal protection. These principles of
1885 humane treatment of laboratory animals are described as:

- 1886 • Refining experimental procedures such that animal suffering is minimized
- 1887 • Reducing animal use through improved science and experimental design
- 1888 • Replacing animal models with nonanimal procedures (e.g., *in vitro*
1889 technologies), where possible (Russell and Burch 1992)

1890 The HET-CAM test method has the potential to refine and reduce animal use in eye irritation
1891 testing. The HET-CAM test method would refine animal use by the *in vitro* identification of
1892 ocular corrosives and severe irritants, nonsevere irritants, or substances not labeled as
1893 irritants when used in a tiered testing scheme. Substances identified as corrosives or severe
1894 irritants would be excluded from *in vivo* testing. Furthermore, the ability to identify mild and
1895 moderate ocular irritants would eliminate the need for *in vivo* testing thus sparing rabbits
1896 from the pain associated with these types of substances. The HET-CAM test method can also
1897 reduce animal use because the test method does not use live animals and use of this test
1898 method in lieu of one that uses live animals or animals used as a food source (e.g., BCOP,
1899 ICE, IRE) would further reduce the number of animals in a tiered-testing strategy.

1900 **10.2 Requirement for the Use of Animals**

1901 The HET-CAM test method has been designed so as not to require the use of animals.
1902 International regulations have provisions for the protection of animals used for experimental
1903 or other scientific purposes. Some provisions indicate the time in which a test method using
1904 an animal embryo or fetus is considered an animal, and therefore protected by the
1905 regulations. According to some of these regulations, a bird is considered a protected animal
1906 (and therefore the test is considered an *in vivo* and not *in vitro* test) when greater than half of
1907 the gestation or incubation period has elapsed (day 10.5 of the 21 day incubation period for a

1908 chicken embryo) (Animals [Scientific Procedures] Act 1986; EU 1986). The Public Health
1909 Service Policy, with which all National Institutes of Health (NIH)-funded research projects
1910 must comply, applies to all live vertebrate species. The NIH Office of Laboratory Animal
1911 Welfare has provided written guidance in this area, interpreting "live vertebrate animal" to
1912 apply to avians (e.g., chick embryos) only after hatching (Kulpa-Eddy J, personal
1913 communication; NIH 2000).

1914 It has been proposed that at incubation day nine, the embryonic differentiation of the chicken
1915 central nervous system is sufficiently incomplete that suffering from pain perception is
1916 unlikely to occur (MSPCA 2005; Liebsch M, personal communication). Evaluations suggest
1917 that there are few sensory fibers present at day nine in the avian embryo and that there is
1918 significant development of the sensory nerve ending between incubation days 11 and 14
1919 (Romanoff 1960). Studies also have suggested that the extraembryonal vascular systems
1920 (e.g., yolk sac, CAM) are not sensitive to pain (Rosenbruch 1997; Spielmann H, personal
1921 communication). Combined, these studies suggest that at incubation day nine there is little to
1922 no pain perceived by the developing embryo during the conduct of the HET-CAM test
1923 method.

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2056 **12.0 Glossary**⁶

2057

2058 **Accuracy**⁷: (a) The closeness of agreement between a test method result and an accepted
2059 reference value. (b) The proportion of correct outcomes of a test method. It is a measure of
2060 test method performance and one aspect of “relevance.” The term is often used
2061 interchangeably with “concordance” (see also “two-by-two” table). Accuracy is highly
2062 dependent on the prevalence of positives in the population being examined.

2063

2064 **Assay**²: The experimental system used. Often used interchangeably with “test” and “test
2065 method.”

2066

2067 **Benchmark substance**: A substance used as a standard for comparison to a test substance.

2068 A benchmark substance should have the following properties:

- 2069 • a consistent and reliable source(s)
- 2070 • structural and functional similarity to the class of substances being tested
- 2071 • known physical/chemical characteristics
- 2072 • supporting data on known effects
- 2073 • known potency in the range of the desired response

2074

2075 **Benchmark control**: A sample containing all components of a test system and treated with a
2076 known substance (i.e., the benchmark substance) to induce a known response. The sample is
2077 processed with test substance-treated and other control samples to compare the response
2078 produced by the test substance to the benchmark substance to allow for an assessment of the
2079 sensitivity of the test method to assess a specific chemical class or product class.

2080

2081 **Blepharitis**: Inflammation of the eyelids.

2082

2083 **Bulbar conjunctiva**: The portion of the conjunctiva that covers the outer surface of the eye.

2084

⁶ The definitions in this Glossary are restricted to their uses with respect to the Draize rabbit eye test method and the HET-CAM test method.

2085 **Chorioallantoic membrane (CAM):** A vascularized respiratory fetal membrane that is
2086 composed of the chorion and allantois.

2087

2088 **Classification system:** An arrangement of quantified results or data into groups or categories
2089 according to previously established criteria.

2090

2091 **Coagulation:** The process of a liquid becoming viscous, jellylike, or solid by chemical
2092 reaction.

2093

2094 **Coded substances:** Substances labeled by code rather than name so that they can be tested
2095 and evaluated without knowledge of their identity or anticipation of test results. Coded
2096 substances are used to avoid intentional or unintentional bias when evaluating laboratory or
2097 test method performance.

2098 **Coefficient of variation:** A statistical representation of the precision of a test. It is expressed
2099 as a percentage and is calculated as follows:

2100

2101
$$\left(\frac{\textit{standard deviation}}{\textit{mean}} \right) \times 100\%$$

2102 **Concordance²:** The proportion of all substances tested that are correctly classified as
2103 positive or negative. It is a measure of test method performance and one aspect of
2104 “relevance.” The term is often used interchangeably with “accuracy” (see also “two-by-two”
2105 table). Concordance is highly dependent on the prevalence of positives in the population
2106 being examined.

2107

2108 **Conjunctiva:** The mucous membrane that lines the inner surfaces of the eyelids and folds
2109 back to cover the front surface of the eyeball, except for the central clear portion of the outer
2110 eye (the cornea). The conjunctiva is composed of three sections: palpebral conjunctiva,
2111 bulbar conjunctiva, and fornix.

• ⁷ Definition used by the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM 2003).

2112

2113 **Conjunctival sac:** The space located between the eyelid and the conjunctiva-covered
2114 eyeball. Substances are instilled into the sac to conduct an *in vivo* eye test.

2115

2116 **Cornea:** The transparent part of the coat of the eyeball that covers the iris and pupil and
2117 admits light to the interior.

2118

2119 **Corneal opacity:** Measurement of the extent of opaqueness of the cornea following exposure
2120 to a test substance. Increased corneal opacity is indicative of damage to the cornea. Opacity
2121 can be evaluated subjectively, as done in the Draize rabbit eye test, or objectively with an
2122 instrument such as an “opacitometer”.

2123

2124 **Corrosion:** Destruction of tissue at the site of contact with a substance.

2125

2126 **Corrosive:** A substance that causes irreversible tissue damage at the site of contact.

2127

2128 **Endpoint²:** The biological process, response, or effect assessed by a test method.

2129

2130 **False negative²:** A substance incorrectly identified as negative by a test method.

2131

2132 **False negative rate²:** The proportion of all positive substances falsely identified by a test
2133 method as negative (see “two-by-two” table). It is one indicator of test method accuracy.

2134

2135 **False positive²:** A substance incorrectly identified as positive by a test method.

2136

2137 **False positive rate²:** The proportion of all negative substances that are falsely identified by
2138 a test method as positive (see “two-by-two” table). It is one indicator of test method
2139 accuracy.

2140

2141 **Fibrous tunic:** The outer of the three membranes of the eye, comprising the cornea and the

2142 sclera; called also *tunica fibrosa oculi*.

2143

2144 **Globally Harmonized System (GHS):** A classification system presented by the United
2145 Nations that provides (a) a harmonized criteria for classifying substances and mixtures
2146 according to their health, environmental and physical hazards, and (b) harmonized hazard
2147 communication elements, including requirements for labeling and safety data sheets.

2148

2149 **Good Laboratory Practices (GLP)²:** Regulations promulgated by the U.S. Food and Drug
2150 Administration and the U.S. Environmental Protection Agency, and principles and
2151 procedures adopted by the Organization for Economic Cooperation and Development and
2152 Japanese authorities that describe record keeping and quality assurance procedures for
2153 laboratory records that will be the basis for data submissions to national regulatory agencies.

2154

2155 **Hazard²:** The potential for an adverse health or ecological effect. A hazard potential results
2156 only if an exposure occurs that leads to the possibility of an adverse effect being manifested.

2157

2158 **Hemorrhage:** Discharge of blood from a vessel.

2159

2160 **Hyperemia:** Excess of blood in a body part.

2161

2162 **Interlaboratory reproducibility²:** A measure of whether different qualified laboratories
2163 using the same protocol and test substances can produce qualitatively and quantitatively
2164 similar results. Interlaboratory reproducibility is determined during the prevalidation and
2165 validation processes and indicates the extent to which a test method can be transferred
2166 successfully among laboratories.

2167

2168 **Intralaboratory repeatability²:** The closeness of agreement between test results obtained
2169 within a single laboratory when the procedure is performed on the same substance under
2170 identical conditions within a given time period.

2171

2172 **Intralaboratory reproducibility²:** The first stage of validation; a determination of whether
2173 qualified people within the same laboratory can successfully replicate results using a specific
2174 test protocol at different times.

2175

2176 ***In vitro*:** In glass. Refers to assays that are carried out in an artificial system (e.g., in a test
2177 tube or petri dish) and typically use single-cell organisms, cultured cells, cell-free extracts, or
2178 purified cellular components.

2179

2180 ***In vivo*:** In the living organism. Refers to assays performed in multicellular organisms.

2181

2182 **Iris:** The contractile diaphragm perforated by the pupil and forming the colored portion of
2183 the eye.

2184

2185 **Irritation Score:** Value calculated by different analysis methods, which is used to classify
2186 the irritancy potential of a test substance. Also referred to as IS.

2187

2188 **Irritation Threshold Concentration:** The lowest concentration of a test substance required
2189 to produce a weak or slight irritant response on the CAM. Also referred to as ITC.

2190

2191 **IS(A) analysis method:** HET-CAM analysis method where endpoints are observed at
2192 specified time points after application of the test substance (typically 0.5, 2, and 5 minutes
2193 post exposure). At the time points, presence of an endpoint is determined and a score
2194 assigned, if it is present. The scores are totaled to yield an overall irritation score.

2195

2196 **IS(B) analysis method:** HET-CAM analysis method where endpoints are observed over the
2197 entire observation period after application of the test substance (typically 5 minutes). The
2198 time (in seconds) when an endpoint develops is noted and the times are used to yield an
2199 overall irritation score using a mathematical formula.

2200

2201 **Lysis:** The disintegration of blood vessels.

2202

2203 **Mean Time to Coagulation (mtc):** Mean detection time for appearance of coagulation
2204 endpoint.

2205

2206 **Negative control:** An untreated sample containing all components of a test system, except
2207 the test substance solvent, which is replaced with a known nonreactive material, such as
2208 water. This sample is processed with test substance-treated samples and other control
2209 samples to determine whether the solvent interacts with the test system.

2210

2211 **Negative predictivity²:** The proportion of correct negative responses among substances
2212 testing negative by a test method (see “two-by-two” table). It is one indicator of test method
2213 accuracy. Negative predictivity is a function of the sensitivity of the test method and the
2214 prevalence of negatives among the substances tested.

2215

2216 **Neuroectodermal tunic:** The innermost of three membranes of the eye, comprising the
2217 retina.

2218

2219 **Nictating membrane:** The membrane that moves horizontally across the eye in some animal
2220 species (e.g., rabbit, cat) to provide additional protection in particular circumstances. It may
2221 be referred to as the “third eyelid.”

2222

2223 **Not Labeled:** (a) A substance that produces no changes in the eye following application to
2224 the anterior surface of the eye. (b) Substances that are not classified as GHS Category 1, 2A,
2225 or 2B; or EU R41 or R36 ocular irritants.

2226

2227 **Nonsevere irritant:** (a) A substance that causes tissue damage in the eye following
2228 application to the anterior surface of the eye; the tissue damage is reversible within 21 days
2229 of application and the observed adverse effects in the eye are less severe than observed for a
2230 severe irritant. (b) Substances that are classified as GHS Category 2A or 2B; EPA Category

2231 II, III, or IV; or EU R36 ocular irritants.

2232

2233 **Ocular:** Of or relating to the eye.

2234

2235 **Ocular corrosive:** A substance that causes irreversible tissue damage in the eye following
2236 application to the anterior surface of the eye.

2237

2238 **Ocular irritant:** A substance that produces a reversible change in the eye following
2239 application to the anterior surface of the eye.

2240

2241 **Palpebral conjunctiva:** The part of the conjunctiva that covers the inner surface of the
2242 eyelids.

2243

2244 **Pannus:** A specific type of corneal inflammation that begins within the conjunctiva, and with
2245 time spreads to the cornea. Also referred to as "chronic superficial keratitis."

2246

2247 **Performance²:** The accuracy and reliability characteristics of a test method (see "accuracy,
2248 reliability").

2249

2250 **pH:** A measure of the acidity or alkalinity of a solution; pH 7.0 is neutral, higher pHs are
2251 alkaline, lower pHs are acidic.

2252

2253 **Positive control:** A sample containing all components of a test system and treated with a
2254 substance known to induce a positive response, which is processed with the test substance-
2255 treated and other control samples to demonstrate the sensitivity of each experiment and to
2256 allow for an assessment of variability in the conduct of the assay over time.

2257

2258 **Positive predictivity²:** The proportion of correct positive responses among substances
2259 testing positive by a test method (see "two-by-two" table). It is one indicator of test method
2260 accuracy. Positive predictivity is a function of the sensitivity of the test method and the

2261 prevalence of positives among the substances tested.

2262

2263 **Prevalence²**: The proportion of positives in the population of substances tested (see “two-by-
2264 two” table).

2265

2266 **Protocol²**: The precise, step-by-step description of a test, including the listing of all
2267 necessary reagents, criteria and procedures for the evaluation of the test data.

2268

2269 **Q-Score**: HET-CAM analysis method that calculates the ratio from the irritation score of a
2270 test substance compared to the irritation score of a reference substance. This HET-CAM
2271 analysis method is typically used with transparent test substances.

2272

2273 **Quality assurance²**: A management process by which adherence to laboratory testing
2274 standards, requirements, and record keeping procedures is assessed independently by
2275 individuals other than those performing the testing.

2276

2277 **Reduction alternative²**: A new or modified test method that reduces the number of animals
2278 required.

2279

2280 **Reference test method²**: The accepted *in vivo* test method used for regulatory purposes to
2281 evaluate the potential of a test substance to be hazardous to the species of interest.

2282

2283 **Refinement alternative²**: A new or modified test method that refines procedures to lessen
2284 or eliminate pain or distress in animals or enhances animal well-being.

2285

2286 **Relevance²**: The extent to which a test method correctly predicts or measures the biological
2287 effect of interest in humans or another species of interest. Relevance incorporates
2288 consideration of the “accuracy” or “concordance” of a test method.

2289

2290 **Reliability**²: A measure of the degree to which a test method can be performed reproducibly
2291 within and among laboratories over time. It is assessed by calculating intra- and inter-
2292 laboratory reproducibility and intralaboratory repeatability.

2293

2294 **Replacement alternative**²: A new or modified test method that replaces animals with
2295 nonanimal systems or one animal species with a phylogenetically lower one (e.g., a mammal
2296 with an invertebrate).

2297

2298 **Reproducibility**²: The consistency of individual test results obtained in a single laboratory
2299 (intralaboratory reproducibility) or in different laboratories (interlaboratory reproducibility)
2300 using the same protocol and test substances (see intra- and inter-laboratory reproducibility).

2301

2302 **Sclera**: The tough, fibrous tissue that extends from the cornea to the optic nerve at the back
2303 of the eye.

2304

2305 **Sensitivity**²: The proportion of all positive substances that are classified correctly as
2306 positive in a test method. It is a measure of test method accuracy (see “two-by-two” table).

2307

2308 **Secondary bacterial keratitis**: Inflammation of the cornea that occurs secondary to another
2309 insult that compromised the integrity of the eye.

2310

2311 **Severe irritant**: (a) A substance that causes tissue damage in the eye following application
2312 to the anterior surface of the eye that is not reversible within 21 days of application or causes
2313 serious physical decay of vision. (b) Substances that are classified as GHS Category 1, EPA
2314 Category I, or EU R41 ocular irritants.

2315

2316 **Solvent control**: An untreated sample containing all components of a test system, including
2317 the solvent that is processed with the test substance-treated and other control samples to
2318 establish the baseline response for the samples treated with the test substance dissolved in the

2319 same solvent. When tested with a concurrent negative control, this sample also demonstrates
2320 whether the solvent interacts with the test system.

2321

2322 **Specificity²:** The proportion of all negative substances that are classified correctly as
2323 negative in a test method. It is a measure of test method accuracy (see “two-by-two” table).

2324

2325 **S-Score:** HET-CAM analysis method that totals the severity scores for each endpoint
2326 evaluated. The highest total score is used as the S-Score. This HET-CAM analysis method
2327 is typically used with non-transparent test substances.

2328

2329 **Test²:** The experimental system used; used interchangeably with “test method” and “assay.”

2330

2331 **Test method²:** A process or procedure used to obtain information on the characteristics of a
2332 substance or agent. Toxicological test methods generate information regarding the ability of a
2333 substance or agent to produce a specified biological effect under specified conditions. Used
2334 interchangeably with “test” and “assay.” See also “validated test method” and “reference
2335 test.”

2336

2337 **Test method component:** Structural, functional, and procedural elements of a test method
2338 that are used to develop the test method protocol. These components include unique
2339 characteristics of the test method, critical procedural details, and quality control measures.

2340

2341 **Tiered testing:** A testing strategy where all existing information on a test substance is
2342 reviewed, in a specified order, prior to *in vivo* testing. If the irritancy potential of a test
2343 substance can be assigned, based on the existing information, no additional testing is
2344 required. If the irritancy potential of a test substance cannot be assigned, based on the
2345 existing information, a step-wise animal testing procedure is performed until an unequivocal
2346 classification can be made.

2347

2348 **Toxic keratoconjunctivitis:** Inflammation of the cornea and conjunctiva due to contact with

2349 an exogenous agent. Used interchangeably with “contact keratoconjunctivitis, irritative
2350 keratoconjunctivitis, and chemical keratoconjunctivitis.”

2351

2352 **Transferability²**: The ability of a test method or procedure to be accurately and reliably
2353 performed in different, competent laboratories.

2354

2355 **Two-by-two table²**: The two-by-two table can be used for calculating accuracy (concordance)
2356 ($(a+d)/(a+b+c+d)$), negative predictivity ($d/(c+d)$), positive predictivity ($a/(a+b)$), prevalence
2357 ($(a+c)/(a+b+c+d)$), sensitivity ($a/(a+c)$), specificity ($d/(b+d)$), false positive rate ($b/(b+d)$),
2358 and false negative rate ($c/(a+c)$).

2359

		New Test Outcome		
		Positive	Negative	Total
Reference Test Outcome	Positive	a	c	a + c
	Negative	b	d	b + d
	Total	a + b	c + d	a + b + c + d

2360

2361 **Uvea tract**: The middle of three membranes of the eye, comprising the iris, ciliary body, and
2362 choroid. Also referred to as the "vascular tunic".

2363

2364 **Validated test method²**: An accepted test method for which validation studies have been
2365 completed to determine the relevance and reliability of this method for a specific proposed
2366 use.

2367

2368 **Validation²**: The process by which the reliability and relevance of a procedure are
2369 established for a specific purpose.

2370

2371 **Vascular tunic**: The middle of three membranes of the eye, comprising the iris, ciliary body,

2372 and choroid. Also referred to as the "uvea."

2373

2374 **Weight of evidence (process):** The strengths and weaknesses of a collection of information

2375 are used as the basis for a conclusion that may not be evident from the individual data.

2376