DRAFT ICCVAM TEST METHOD RECOMMENDATIONS
Assessment of the Use of the LLNA to Address Relative Skin
Sensitization Potency
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16 Background: ICCVAM is currently evaluating the validation status of the LLNA for the 17 classification of skin sensitization potency. The information included in this BRD is based on a retrospective review of LLNA, guinea pig, and human data derived from a 18 19 database of over 500 substances, 170 of which have comparative LLNA, guinea pig, 20 and/or human data. Among these 170 substances, there are 112 substances with 21 comparative human data (97 sensitizers, 15 non-sensitizers), 105 substances with 22 comparative guinea pig data (52 sensitizers, 53 non-sensitizers), and 47 substances with 23 comparative human and guinea pig data (34 sensitizers, 13 non-sensitizers). The performance of the LLNA, using LLNA EC3 values, was evaluated against the potency 24 25 classification assigned based on either human or guinea pig data. 26 Draft Recommendations: Using LLNA Data to Predict Human Potency Classification Categories (i.e., Strong vs. 27 Weak¹): Based on this analysis, there is a significant positive correlation (p < 0.0001) 28 29 between EC3 values and human threshold values used to distinguish strong from weak 30 sensitizers. An accuracy analyses was conducted using a range of LLNA EC3 values versus human threshold concentrations using either $\leq 250 \, \Box \, \text{g/cm}^2 \, \text{or} \leq 500 \, \Box \, \text{g/cm}^2$ as the 31 threshold for discriminating between strong and weak human sensitizers. However, this 32 correlation is not very strong, as evidenced by R²=0.405. The data suggest that there is 33 34 only a small difference in accuracy when the human threshold concentration for 35 distinguishing weaker sensitizers from strong sensitizers is $\leq 250 \, \Box \, \text{g/cm}^2 \, \text{or} \leq 500 \, \Box$ □ g/cm². The LLNA EC3 threshold values that provide optimal (albeit modest) 36 classification when compared to either of the two proposed human threshold values (≤ 37 250 \Box g/cm² and ≤ 500 \Box g/cm²) were 6.8% and 8.1%, respectively. Using these two EC3 38 values, the correct classification rate was 74% (60/81) and 70% (57/81) for 250 and 500 39 ug/cm², respectively, while the over- and under-classification rates ranged from 28% 40 41 (10/36) to 31% (9/29) and 24% (11/45) to 29% (15/52), respectively.

Draft Recommendations: Test Method Uses and Limitations

¹ Although the skin sensitization categories proposed by the GHS (United Nations Globally Harmonized System for the Labelling and Classification of Chemicals) are Category 1: Strong Sensitizer and Category 2: Sensitizer, to avoid confusion in this document these are instead referred to as "strong" and "weak" sensitizers.

42 When substances incorrectly identified as false positive or false negative in the LLNA 43 (when compared to highest accuracy for human data) are included in these analyses, as 44 well as those classified as non-sensitizers in both the LLNA and in humans, the optimal 45 EC3 value was 9.4% for either human threshold concentration. Using all 112 substances 46 with both LLNA and human data, the correct classification rate was 62% (70/112) and 60% (67/112) for 250 and 500 µg/cm², respectively, while the over- and under-47 classification rates ranged from 26% (13/50) to 33% (5/15) and 21% (10/47) to 33% 48 49 (14/43), respectively. 50 Using LLNA Data to Predict Guinea Pig Potency Classification Categories (i.e., Strong 51 vs. Weak): Based on this limited dataset, there does not appear to be a significant 52 association between LLNA EC3 values and sensitization potency based on guinea pig 53 data. In one analysis, which focused only on substances classified as sensitizers in both 54 the LLNA and in guinea pigs, overclassification means that weak sensitizers are 55 missclassified as strong while underclassification means that strong sensitizers are 56 missclassified as weak. Using the optimal EC3 value of 2.0%, the correct classification 57 rate was 73% (38/52), while the over- and under-classification rates were 28% and 26%, respectively. In a second analysis, which included substances classified as sensitizers in 58 59 both the LLNA and in humans as well as substances classified in the LLNA as false 60 positives and false negatives compared to the human, and substances classified as non-61 sensitizers in both the LLNA and in humans. In this analysis, overclassification means that nonsensitizers are misclassified as weak or strong sensitizers and weak sensitizers are 62 63 missclassified as strong while underclassification means that strong sensitizers are 64 missclassified as weak or nonsensitizers and weak sensitizers are misclassified as 65 nonsensitizers. Using the optimal EC3 value of 3.6%, the correct classification rate was 66 57% (60/105), while the over- and under-classification rates ranged from 25% (8/32) to 67 61% (30/49) and 9% (3/32) to 17% (4/24), respectively. 68 Considered together, these data indicate that although there is a significant positive 69 correlation between LLNA EC3 values and human sensitization threshold doses, this 70 correlation is not strong. Therefore, the LLNA should not be considered as stand-alone 71 test method for predicting sensitization potency, but must instead be used as part of a 72 weight-of-evidence evaluation to discriminate between strong and weak sensitizers.

73	2.0	Draft Recommendations: Test Method Protocol for the LLNA

- 74 The ICCVAM recommended LLNA protocol, which is based on recommendations from
- an independent expert peer review panel evaluation of the LLNA (ICCVAM 1999), can
- be found on the ICCVAM-NICEATM website at
- 77 http://iccvam.niehs.nih.gov/methods/immunotox/llnadocs/LLNAProt.pdf (ICCVAM
- 78 2001). The LLNA procedure is also described in the EPA Health Effects Test Guidelines
- 79 (EPA 2003) and OECD TG 429 (OECD 2002). Although not included in these protocols,
- a description of how to calculate an EC3 is included in the draft ICCVAM LLNA
- 81 performance standards
- 82 (http://iccvam.niehs.nih.gov/methods/immunotox/PerfStds/LLNAPerfStd07Jan08FD.pdf)

83 3.0 Draft Recommendations: Future Studies

- 84 To further evaluate the usefulness and limitations of the LLNA for potency
- determinations, efforts should be made to identify additional human data and human
- 86 experience and guinea pig data for substances with comparative LLNA data. Emphasis
- should be placed on identifying substances that are classified as strong sensitizers based
- on a threshold concentration between 250 µg/cm² to 500 µg/cm² to more adequately
- 89 evaluate the usefulness and limitations of choosing one of these two reference thresholds
- 90 that have been proposed.

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