



# Skin Irritation & Corrosion

**25 January 2018**

# Webinar aims



- The first in a series of three webinars with the PETA International Science Consortium. This series updates the popular 2014-2015 webinar series and will reflect the significant progress in the use and acceptance of non-animal testing that has occurred in recent years. It will include:
- *In vitro* methods that can be used to meet REACH data requirements for skin irritation and corrosion under Annexes VII and VIII;
- Specific examples to explain how the in vitro methods can be used in an integrated approach to testing and assessment using specific examples.

# Speakers



- **Dr Gertrude-Emilia Costin** - Gertrude-Emilia is the manager of scientific services at the Institute for In Vitro Sciences, Inc (IIVS). In her role as study director, she is in charge of a wide variety of safety and efficacy commercial studies based on in vitro test systems. Her main area of expertise is the use of in vitro test methods for the dermal safety assessment of ingredients and final formulations manufactured by the personal-care or pharmaceutical industries as well as that of products to be registered under the US Federal Insecticide, Fungicide, and Rodenticide Act, which is regulated by the US Environmental Protection Agency.



- **Dr Costanza Rovida** – Costanza is a chemist working as a scientific officer at the Center for Alternatives to Animal Testing–Europe (CAAT-Europe) and a project manager for TEAM Mastery. Convinced that in vivo methods are not the right scientific answer to our toxicological questions, from 2005 to 2008, she worked at the European Centre for the Validation of Alternative Methods, where she gained experience in the application of alternative methods in the area of skin and respiratory sensitisation.

**Chair – Name – Job Title - Organisation**

- **Please submit questions during the webinar using your chat box.**
- Any unanswered questions can be raised in the Chemical Watch LinkedIn group following the webinar:

**[www.chemicalwatch.com/CRM-LI](http://www.chemicalwatch.com/CRM-LI)**

# Event Title 2017

13-14 November | Brussels, Belgium

#Hash tag | @chemicalwatch



# Skin Irritation/Corrosion Webinar



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01-301-947-6524

25 January 2018

# Overview

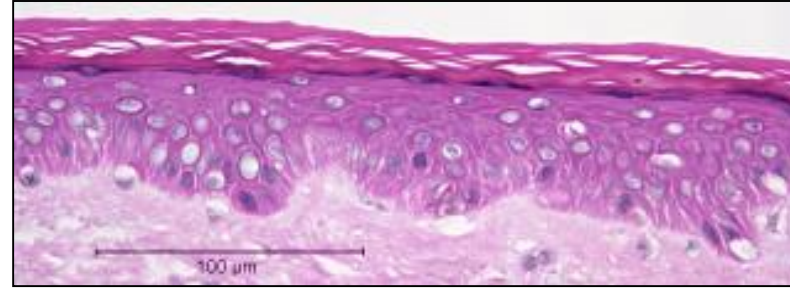
1. The impact of test substances on human skin
2. The animal test system used for skin corrosion and irritation assessment
3. Evaluation of skin corrosion and irritation potential using *in vitro* assays
4. Conclusions – *in vitro* assays validated for regulatory purposes (skin corrosion and irritation endpoints)



# 1. The impact of test substances on human skin



# Skin corrosive/irritant



Stratum corneum  
Stratum granulosum  
Stratum spinosum  
Basal layer of dividing keratinocytes

*Native human skin*



**CORROSION**

- Irreversible damage of the skin following exposure to a test substance
- Visible necrosis through the epidermis and into dermis - macroscopically typified by ulcers, bleeding, etc.



**IRRITATION**

- Reversible damage of the skin following exposure to a test substance
- Characterized macroscopically by erythema (redness) and oedema
- Damage to keratinocytes and dermal cells leads to inflammation

Registration and labeling of chemicals \* Transport of chemicals \* Occupational safety  
Safety of cosmetics, toiletries and household products

<http://www.survivingdisasters.info/emergency-first-aid/c/chemical-burn>

## 2. The animal test system used for skin corrosion and irritation assessment

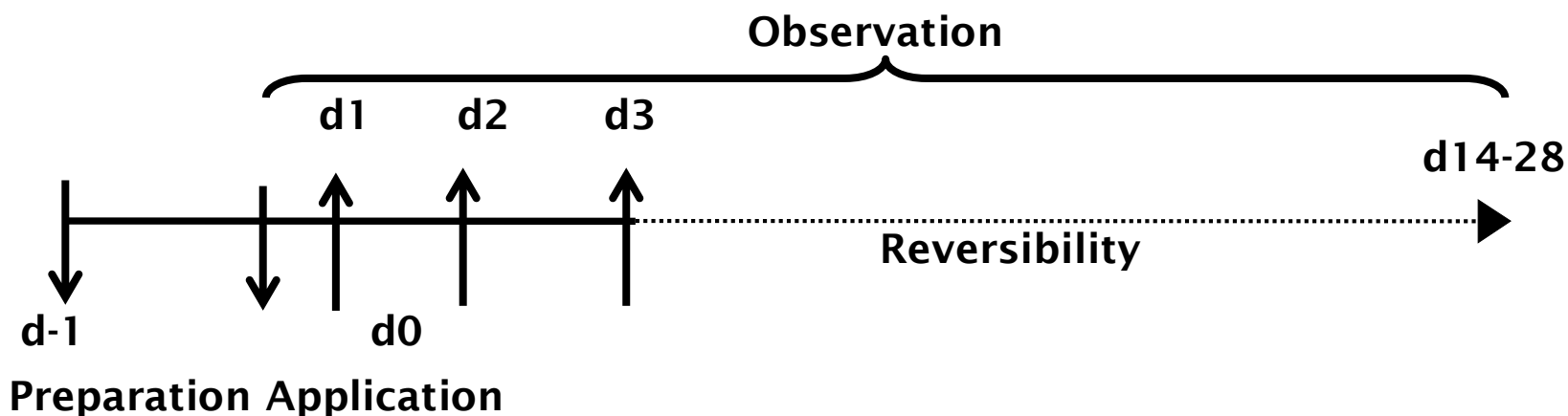
# Acute dermal corrosion and irritation animal test (Draize)

## Brief overview and current regulatory status

- **Test system:** albino rabbits
  - **Assay endpoint:** erythema and eschar formation; oedema formation
  - **Assay control:** untreated skin areas of the test animal
- 
- **Applicability:** Evaluation of the corrosion and irritation potential of test substances
  - **Limitations:** The rabbit and human skin have different physiological properties and responses to environmental and chemical agents. Some test substances are more toxic to rabbits than to humans and vice versa.  
  
The Draize rabbit skin irritation test has been criticized for over-prediction of human skin irritation.  
  
A debated ethical issue of the *in vivo* test concerns the animals' suffering and discomfort.
- 
- **Regulatory status:** OECD Test Guideline 404 (TG 404) (updated 24 April 2015)

# Draize: Typical protocol

- **Animals:** 1-3 rabbits (sequential testing)
- **Test substance:** 0.5 mL or 0.5 g of usually undiluted liquid or moistened solid test substance applied on 6 cm<sup>2</sup> skin surface
- **Exposure:** 3 minutes, 1 hr or 4 hr (skin corrosion); 4 hr (skin irritation)



Erythema and eschar formation	
No erythema	0
Very slight erythema (barely perceptible)	1
Well defined erythema	2
Moderate to severe erythema	3
Severe erythema (beef redness) to eschar formation preventing grading of erythema	4

Oedema formation	
No oedema	0
Very slight oedema (barely perceptible)	1
Slight oedema (edges or area well defined by definite raising)	2
Moderate oedema (raised approximately 1 mm)	3
Severe oedema (raised more than 1 mm and extending beyond area of exposure)	4

*Draize J. H., Woodard G., Clavery, H.O. Methods for the study of irritation and toxicity of substances applied topically to the skin and mucous membranes, J. Pharmacol. Exp. Ther., 82, 377-390 (1944).*

### 3. Evaluation of skin corrosion and irritation potential using *in vitro* assays

#### ❖ *General considerations*

# Assessment of skin corrosion and irritation

- The impact of test substances on skin is evaluated **progressively** from corrosion and irritation potential to human compatibility
- Various assays are available depending on the purpose of the testing

<i>In vitro</i> assays validated for regulatory purposes	OECD TG
<b>SKIN CORROSION</b>	
• Transcutaneous Electrical Resistance (TER) Test	430
• RhE (Reconstructed human EpiDermis) Test Method	431
• Membrane Barrier Test Method (Corrositex®)	435
<b>SKIN IRRITATION</b>	
• RhE Test Method – SIT (Skin Irritation Test)	439

Hazard identification and **labelling of chemicals**  
Transportation of dangerous goods like industrial **chemicals (neat or diluted)** and **their mixtures**  
Labelling of finished products (cleaning agents, household products)



# *In vitro* reconstructed human epidermis (RhE) models validated for regulatory purposes

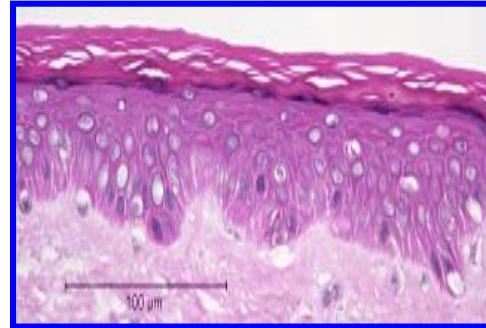
## 1. General model criteria

- Human keratinocytes are used for construction of the models
- Multiple layers of viable epithelial cells
- Functional *stratum corneum* and barrier

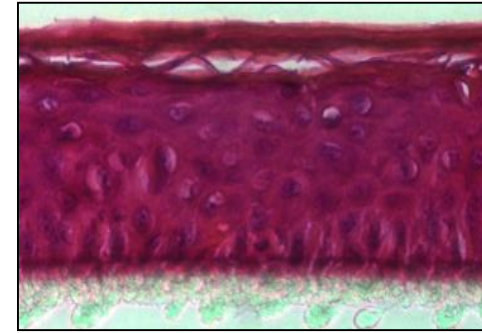
## 2. Functional model criteria

- Tissues must be viable (QC from manufacturer, internal controls)
- *Stratum corneum* must form sufficient barrier
- RhE models should exhibit long term reproducibility

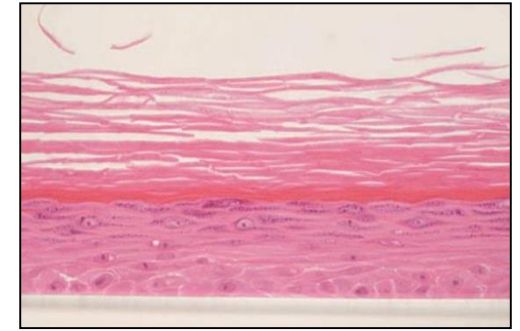
*Native human skin*



epiCS®



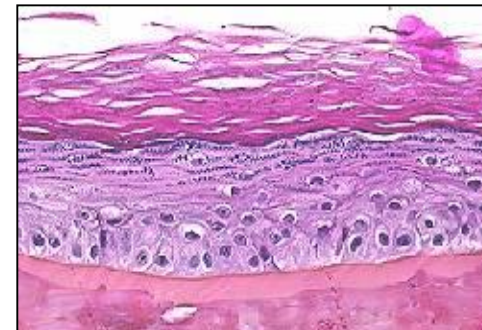
LabCyte EPI-MODEL



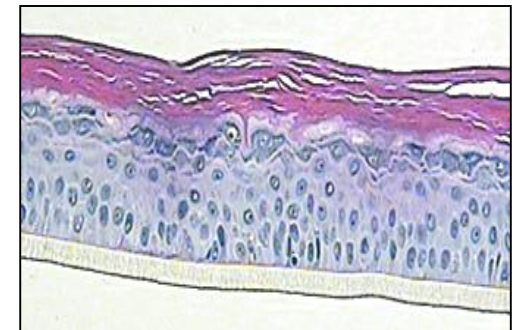
EpiDerm™ (EPI-200)



EpiSkin™ (SM)



SkinEthic™ RHE





### 3. Evaluation of skin corrosion and irritation potential using *in vitro* assays

❖ *Assay specific considerations*

*In vitro* skin corrosion

# Transcutaneous Electrical Resistance Test (OECD 430)

## Brief overview and current regulatory status

- **Test system:** rat skin discs (dorso-lateral, 20 mm each, tested in triplicate from the same animal) - from humanely killed rats aged 28-30 days; Wistar-derived or comparable strain
  - **Assay endpoint:** electrical impedance of the skin expressed as a transcutaneous electrical resistance (TER) value in kilo Ohms (k $\Omega$ ) – measure of barrier function
  - **Assay controls:** negative (sterile, deionized water); positive (10 M hydrochloric acid)
- 
- **Applicability:** Identification of non-corrosive and corrosive test substances and mixtures in accordance with the UN GHS (Globally Harmonized System)
  - **Limitations:** Does not allow the sub-categorization of corrosive substances and mixtures in accordance with the UN GHS
- 
- **Regulatory status**: OECD Test Guideline 430 (TG 430) (updated 26 July 2015)

# TER: Typical protocol

## Tissue Preparation

Skin discs of ~20 mm each are prepared from rats using the procedure outlined in the OECD TG 430.

## Tissue Mounting

Each skin disc is placed over one end of a PTFE (polytetrafluoroethylene) tube, with the epidermal surface in contact with the tube.

## Tissue Treatment

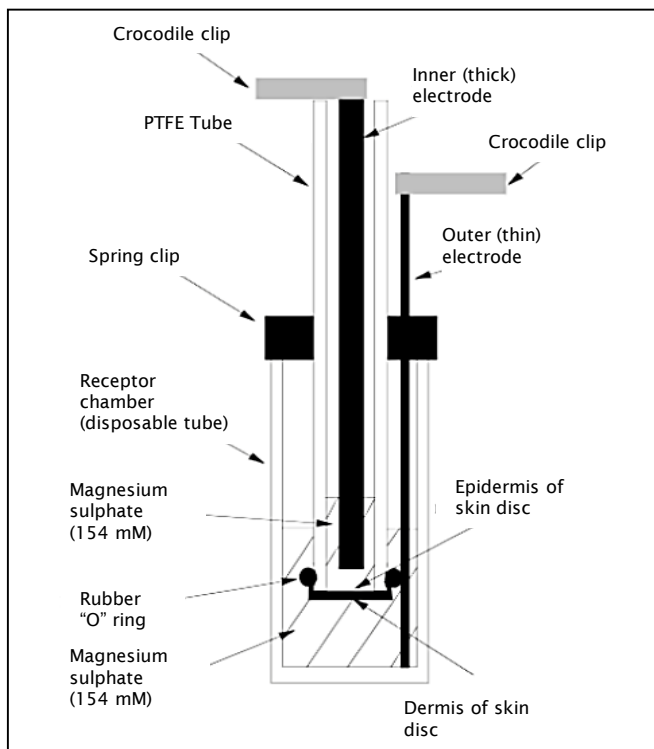
Test substances are applied to the epidermal surface inside the tube for 24 hr at 20-23°C (150 µL for liquids test substances; 150 µL di water added on top of solid test substances).

## Treatment Termination

The test substance is removed with a jet of tap water at up to 30°C.

## TER Measurement

The skin impedance is measured as TER by using a low-voltage, alternating current Wheatstone bridge (1-3V operating voltage, sinus or rectangular shaped AC of 50-100 Hz, measuring range of at least 0.1-30 kΩ).



## Prediction Model

Resistance measured	Prediction to be considered – UN GHS Category
i) If the mean TER value obtained for the test substance is $\leq 5$ kΩ and the skin discs are obviously damaged (e.g., perforated), OR ii) The mean TER value obtained for the test chemical is $\leq 5$ kΩ, AND <ul style="list-style-type: none"> <li>The skin discs show no obvious damage (e.g., perforation), BUT</li> <li>The mean discs dye content is <math>\geq</math> the mean disc dye content of the 10M HCl positive control obtained concurrently)</li> </ul>	Corrosive
i) If the mean TER value obtained for the test substance is $> 5$ kΩ, OR ii) The mean TER value obtained for the test substance is $\leq 5$ kΩ, AND <ul style="list-style-type: none"> <li>The skin discs show no obvious damage (e.g., perforation), AND</li> <li>The mean disc dye content is <math>&lt;</math> the mean disc dye content of the 10 M HCl positive control obtained concurrently</li> </ul>	Non-corrosive

## Dye Binding Method

For test substances that can remove the skin lipids (detergents, emulsifiers, etc.) and make the skin barrier more permeable to ions: if TER values are  $\sim 5$  kΩ, an assessment using 150 µL of the dye sulphorhodamine B (10% w/v) should be performed (2 hr). If the stratum corneum is compromised, the dye will rapidly penetrate and the amount of the dye bound to the skin is assessed (µg/disc) by reading the Optical Density (OD<sub>565nm</sub>).

# RhE Test Method - Skin Corrosion Assay (OECD TG 431)

## Brief overview and current regulatory status

- **Test system:** RhE models [EpiDerm™ (EPI-200); EpiSkin™ (SM); SkinEthic™, RHE; and epiCS®]
  - **Assay endpoint:** tissue viability (%) – assessed by reduction of the vital dye MTT (3-[4,5-dimethylthiazol-2-yl]-2,5-diphenyltetrazolium bromide) by viable cells
  - **Assay controls:** negative (sterile, deionized water or NaCl solution 9g/L)  
positive (8N KOH or glacial acetic acid – only for 4 hr exposure)
- 
- **Applicability:** The results can be used for regulatory purposes for distinguishing or sub-categorization, *i.e.*, 1A vs. 1B-and-1C vs. non-corrosive test substances.
  - **Limitations:** The method does not allow discriminating between skin corrosive sub-categories 1B and 1C according to the UN GHS due to a limited set of well-known *in vivo* corrosive Category 1C chemicals.
- 
- **Regulatory:** OECD Test Guideline 431 (TG 431) (updated 29 July 2016)  
**status**

# RhE: Typical protocol

## Tissue Receipt



Upon receipt, tissues are incubated for at least 1 hr in standard culture conditions ( $37\pm1^{\circ}\text{C}$  in a humidified atmosphere of  $5\pm1\%$   $\text{CO}_2$  in air).

## Tissue Treatment



Media is refreshed after the initial 1 hr incubation. Duplicate tissues are treated topically with control and test substances for 3 min / 1 hr (4 hr) (50  $\mu\text{L}$  dose).

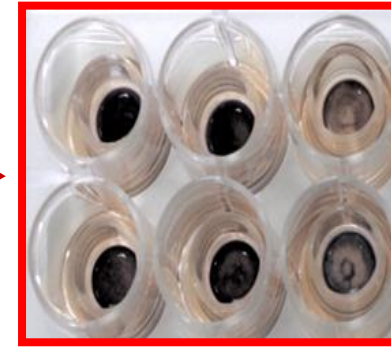
## Tissue Rinsing



After exposure, tissues are rinsed to remove the control and test substances.

Optical density (OD) at 570 nm ( $\text{OD}_{570}$ ) is determined using a 96-well plate reader. OD values are used to calculate relative viability values presented relative to negative control tissue values.

## MTT Reduction



Individual tissues are placed into wells containing unreduced MTT solution and incubated at standard culture conditions for 3 hr.

## Isopropanol Extraction



The tissues are placed in isopropanol at room temperature for 2 hr to extract the reduced MTT. Extracted MTT is thoroughly mixed and transferred to a 96-well plate.

## Spectrophotometric Quantification





# RhE-Corrosion: Prediction Models

## EpiSkin™ (SM)

Viability measured after exposure time points (3, 60 and 240 minutes)	Prediction to be considered UN GHS Category
< 35% after 3-minutes exposure	Corrosive: • Optional Sub-category 1A
≥ 35% after 3-minutes exposure AND < 35% after 60-minutes exposure OR ≥ 35% after 60-minutes exposure AND < 35% after 240-minutes exposure	Corrosive: • A combination of optional Sub-categories 1B and 1C
≥ 35% after 240-minutes exposure	Non-corrosive

*Desprez B., Barroso J., Griesinger C., Kandarova H., Alepee N., Fuchs H.W., Two novel prediction models improve prediction of skin corrosive sub-categories by test methods of OECD, Toxicology in Vitro, 29, 2055-2080 (2015).*

## EpiDerm™ (EPI-200) SkinEthic™ RHE epiCS®

Viability measured after exposure time points (3- and 60-minutes)	Prediction to be considered UN GHS Category
<b>STEP 1</b>	
< 50% after 3-minutes exposure	Corrosive
≥ 50% after 3-minutes exposure AND < 15% after 60-minutes exposure	Corrosive
≥ 50% after 3-minutes exposure AND ≥ 15% after 60-minutes exposure	Non-corrosive
<b>STEP 2</b>	
<25%; 18%; 15% after 3-minutes exposure	Optional Sub-category 1A
≥25%; 18%; 15% after 3-minutes exposure	A combination of optional Sub-categories 1B-and-1C

# Membrane Barrier Test Method (Corrositex®) (OECD 435)

## Brief overview and current regulatory status

- **Test system:** artificial membrane designed to respond to corrosive substances in a manner similar to animal skin *in situ*
  - **Assay endpoint:** the time (in minutes) required for a test substance to penetrate through the Corrositex Biobarrier Membrane and produce a color change in the Chemical Detection System (CDS)
  - **Assay controls:** negative (10% citric acid, 5% propionic acid); positive (sodium hydroxide)
- 
- **Applicability:** Assigns UN Packing Group to corrosives or verifies if a test substance is non-corrosive
  - **Limitations:** Materials with a pH of  $\geq 4.5$  and  $\leq 8.5$  generally fail to qualify for testing based on the CDS used in the kit provided by In Vitro International
- 
- **Regulatory status**: OECD Test Guideline 435 (TG 435) (updated 19 July 2015)



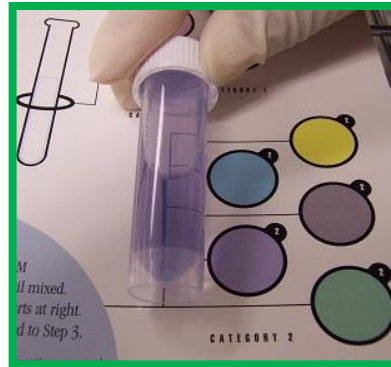
# Corrositex®: Typical protocol

## Qualification of the Test Substance



Each test substance is added to a vial containing the Chemical Detection System (CDS) to determine if the test substance will qualify for testing. A color change can be detected when the pH of the CDS drops below 4.5 or rises above 8.5.

## Categorization



The test substance is next categorized to determine the appropriate timetable for Packing Group Assignment. The test substance is added to two tubes. The resulting color change in each tube is compared to the color chart provided by In Vitro International. A category 1 test substance will be evaluated for up to 4 hr; a category 2 test substance will be evaluated for up to 1 hr.

## Biobarrier Preparation



To prepare the biobarrier membranes, the biobarrier matrix powder is completely solubilized. The solubilized collagen matrix, composed of water and dissolved proteins, is then added to a membrane disc containing a porous cell membrane. The biobarrier membrane is placed onto a vial of CDS.

## Biobarrier Placement



## Break Through Observations



Each test substance is added onto four replicate biobarrier membranes and the CDS vial is continuously monitored for the first 10 min. If no color change occurs, this process is repeated an additional three times until the remaining biobarrier membranes are treated with the test substance. The vials are observed until a color change (*i.e.*, break through) occurs. When a color change occurs in each vial, the break through times are recorded.

# Corrositex<sup>®</sup>: Prediction Model

## Category I

Mean Time to Produce a Change in Chemical Detection System	Packing Group
≤ 3 Minutes	I
> 3 Minutes - 1 Hour	II
> 1 - 4 Hours	III
> 4 Hours	Not Applicable

## Category II

Mean Time to Produce a Change in Chemical Detection System	Packing Group
≤ 3 Minutes	I
> 3 Minutes - 30 minutes	II
> 30 - 60 minutes	III
> 60 minutes	Not Applicable

### 3. Evaluation of skin corrosion and irritation potential using *in vitro* assays

❖ *Assay specific considerations*

*In vitro* skin irritation



**ChemicalRiskManager**

The hub for product safety resources



Know the rules, play your market.



Institute for In Vitro Sciences



# RhE Test Method (SIT) (OECD TG 439)

## Brief overview and current regulatory status

- **Test system:** RhE models (EpiDerm™ (EPI-200), EpiSkin™ (SM), SkinEthic™ RHE, LabCyte EPI-MODEL24)
  - **Assay endpoint:** tissue viability (%) – MTT
  - **Assay controls:** negative (sterile, deionized water or Calcium and Magnesium Free DPBS); positive (5% SDS)
- 
- **Applicability:** The results can be used for regulatory purposes to determine the skin irritancy of test substances either as a stand-alone replacement for *in vivo* skin irritation testing or as partial replacement test within a tiered testing strategy
  - **Limitation:** Does not allow the classification of test substances to the optional UN GHS Category 3 (mild irritants).
- 
- **Regulatory:** OECD Test Guideline 439 (TG 439) (updated 26 July 2015)  
**status**

# RhE: Typical protocol

## Tissue Receipt



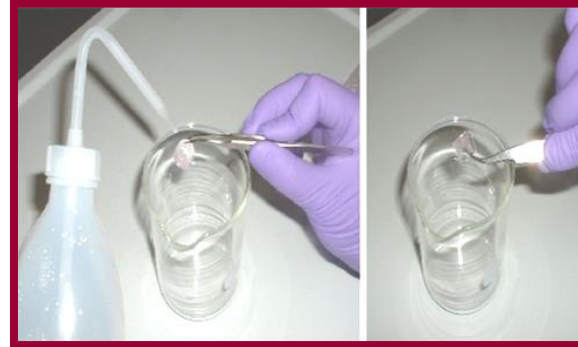
Upon receipt, tissues are incubated first for 1 hr and then over night (with media change) in standard culture conditions.

## Tissue Treatment



Triplicate tissues are treated topically with control and test substances (30  $\mu$ L dose for liquids; 25 mg for solids).

## Tissue Rinsing



After exposure, tissues are rinsed and then placed in the incubator at standard culture conditions for an initial post-treatment incubation of  $24 \pm 1$  hr. After the initial post-treatment expression incubation, the tissues are transferred in fresh medium and placed back in the incubator for the remainder of the  $42 \pm 2$  hr post-treatment incubation (to capture delayed effects of test substances on the reconstructed tissues).

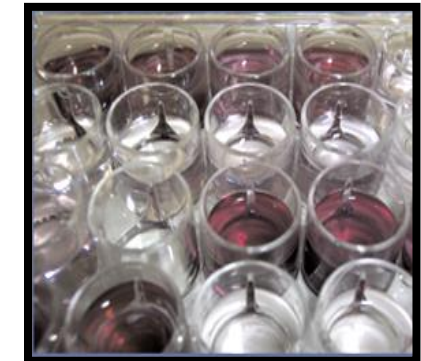
## Post-treatment Expression Incubation



## MTT Reduction



## Isopropanol Extraction



## Spectrophotometric Quantification



## Prediction Model

<i>In vitro</i> result	<i>In vivo</i> prediction	UN GHS CATEGORY
Mean tissue viability $\leq 50\%$	Irritant (I)	Category 1 or 2 (OECD 431 to be used for confirmation of Category 1)
Mean tissue viability $> 50\%$	Non-irritant (NI)	No Category





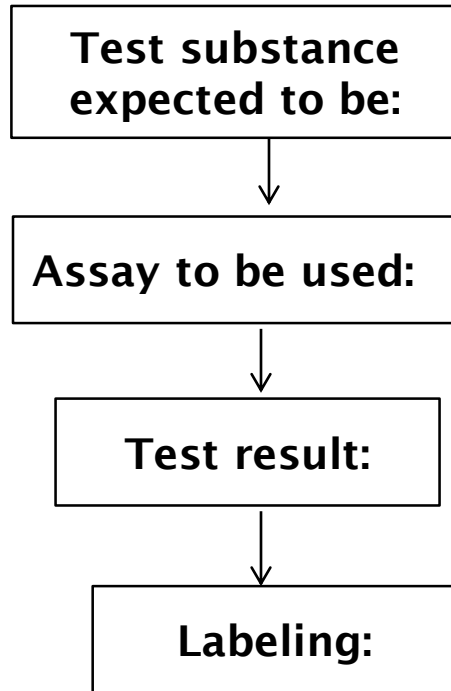
#### 4. Conclusions – *in vitro* assays validated for regulatory purposes (skin corrosion and irritation endpoints)

- Assays designed for regulatory purposes often rely on a **single exposure** time / dose which provides a predictive response
- Assays designed for regulatory use often are limited to the current *in vivo* assay range
- Frequently ingredients-oriented
- Limited in their predictive scope (*not useful for evaluating toxic effects outside of specific predictive range*)
- In the interest of both sound science and animal welfare, *in vivo* testing should not be undertaken until all available data relevant to the potential dermal corrosion and irritation of the test substance have been evaluated in a weight-of-the-evidence analysis.
- Tiered testing strategy including:
  - search for existing studies in humans and/or laboratory animals
  - evidence of corrosion and irritation of structurally related substances or mixtures
  - data demonstrating strong acidity or alkalinity of the substance
  - results from validated and accepted *in vitro* or *ex vivo* tests



# Tiered testing strategies for the assessment of skin corrosion and irritation potential

## Top-Down Strategy



- Test substance may be labeled as corrosive.
- Test substance may also be classified by the relevant packing group.

Corrosive

*In Vitro* Corrosion Assay(s)

*Is the test substance predicted as corrosive?*

Y

N

## Bottom-Up Strategy

Non-Corrosive

*In Vitro* Skin Irritation Assay(s)

*Is the test substance predicted as skin irritant?*

Y

N

The test substance does not require any further skin irritation testing for submission to regulatory agencies utilizing the GHS system.

## News & intelligence through

- a suite of online products
- briefings
- reports & guides
- conferences
- training courses
- elearning
- webinars





# Skin Irritation & Corrosion

# SKIN IRRITATION AND CORROSION

25<sup>th</sup> January 2018

#Hash tag | @chemicalwatch



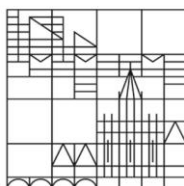


# SKIN IRRITATION AND CORROSION

Testing in vitro for regulatory purposes



Universität  
Konstanz



Costanza Rovida

CAAT Europe

TEAM Mastery



[costanza.rovida@chimici.it](mailto:costanza.rovida@chimici.it)

## The Global Portal to Information on Chemical Substances



eChemPortal

## eChemPortal ▼

- > Home
- > Substance Search
- > Property Search
- > GHS Search
- > What's new?
- > General Information
- > Participating Databases
- > Roles & Responsibilities
- > Linking to eChemPortal
- > Schedules of Assessments
- > Structure Search
- > GHS Classifications
- > Useful links
- > FAQ
- > How to search for information
- > Contact us
- > Disclaimer

## Chemical Substance Search

Thirty four data sources participate under Chemical Substance Search.

## Chemical Property Data Search

Four data sources participate under Chemical Property Data Search.

## GHS Search

Two data sources participate under the GHS Search.

The list of data sources parti



eChemPortal provides free public access to information of chemicals:

- Physical Chemical Properties
- Ecotoxicity
- Environmental Fate and Behaviour
- Toxicity

eChemPortal allows simultaneous searching of report by chemical name and number, by chemical property classification. Direct links to collections of chemical information prepared for government chemical review national, regional and international levels are obtained results according to national/regional hazard classification to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) are provided when available. eChemPortal provides also exposure and use information for chemicals.

## eChemPortal ▼

- > Home
- > Substance Search
- > Property Search
- > GHS Search
- > What's new?
- > General Information
- > Participating Databases
- > Roles & Responsibilities
- > Linking to eChemPortal
- > Schedules of Assessments
- > Structure Search
- > GHS Classifications
- > Useful links
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- > How to search for information
- > Contact us
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## The Global Portal to Information on Chemical Substances



eChemPortal

## Skin irritation / corrosion

Define the search criteria for the Query Block.

Cancel Save

Study result type:

Reliability:

Reference, Year:

Type of method:

Test guideline, Qualifier:

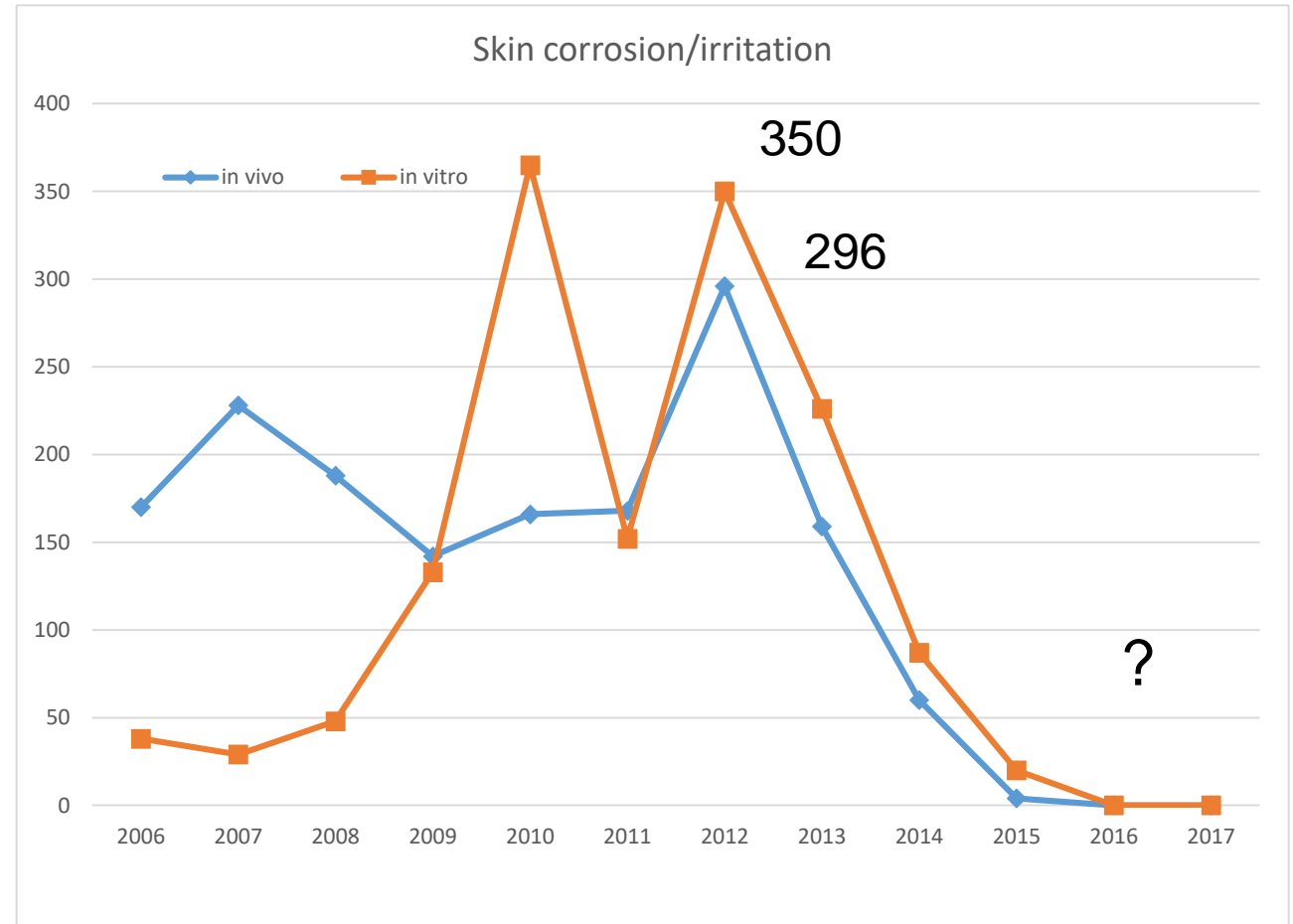
Test guideline, Guideline:

GLP compliance:

# Number of tests per year

## REACH Registration deadlines

- 30<sup>th</sup> November 2010  
substances > 1000 t/y  
CMR > 1 t/y
- 31<sup>st</sup> May 2013  
substances > 100 t/y
- 31<sup>st</sup> May 2018  
substances > 1 t/y





# REACH Regulation, EC 1907/2006 (Registration, Evaluation, Authorisation and restriction of Chemicals)



IUCLID 6

File Edit User Admin Plugins Help

Navigation panel

Search TOC Annotations

REACH Registration 1 - 10 tonnes, standard requirements

Text filter

- 0 Related information
- 1 General information
- 2 Classification & Labelling and PBT assessment
- 3 Manufacture, use and exposure
- 4 Physical and chemical properties
- 5 Environmental fate and pathways
- 6 Ecotoxicological information
- 7 Toxicological information
  - 7.1 Toxicokinetics, metabolism and distribution
  - 7.2 Acute Toxicity
  - 7.3 Irritation / corrosion
    - 7.3.1 Skin irritation / corrosion
    - 7.3.2 Eye irritation
  - 7.4 Sensitisation
  - 7.5 Repeated dose toxicity
  - 7.6 Genetic toxicity
  - 7.7 Carcinogenicity
  - 7.8 Toxicity to reproduction
  - 7.9 Specific investigations
  - 7.10 Exposure related observations in humans
  - 7.11 Toxic effects on livestock and pets
  - 7.12 Additional toxicological information
- 8 Analytical methods
- 11 Guidance on safe use
- 12 Literature search
- 13 Assessment reports
- 14 Information requirements

Chemical Watch substance

Substance name\*

Chemical Watch substance

Public name

Other identifiers

Flags	Identifier	Iden
-------	------------	------

Add... Edit... Delete Move up

Legal entity flags

Legal entity\*

Costanza Rovida

Third party flags

Third party

Information panel

Information Clipboard manager Attachments Modification history

Type Substance

UUID ff799a82-92ff-46c5-8c81-7577b6cdad8a

Dossier UUID

Origin IUCLID

<https://iuclid6.echa.europa.eu/>



# REACH and the use of alternative methods

## Article 1:

*The purpose of this Regulation is to ensure a high level of protection of human health and the environment, including the promotion of alternative methods for assessment of hazards of substances*

## Article 13:

*In particular for human toxicity, information shall be generated whenever possible by means other than vertebrate animal tests, through the use of alternative methods, for example, in vitro methods or qualitative or quantitative structure-activity relationship models or from information from structurally related substances (grouping or read-across).*

## Annex VI “STEP 4 — GENERATE NEW DATA/PROPOSE TESTING STRATEGY

*In some cases it will not be necessary to generate new data. However, where there is an information gap that needs to be filled, new data shall be generated (Annexes VII and VIII), or a testing strategy shall be proposed (Annexes IX and X), depending on the tonnage. New tests on vertebrates shall only be conducted or proposed as a last resort when all other data sources have been exhausted.*

## ANNEX XI

## GENERAL RULES FOR ADAPTATION OF THE STANDARD TESTING REGIME SET OUT IN ANNEXES VII TO X

## 1.4. In vitro methods

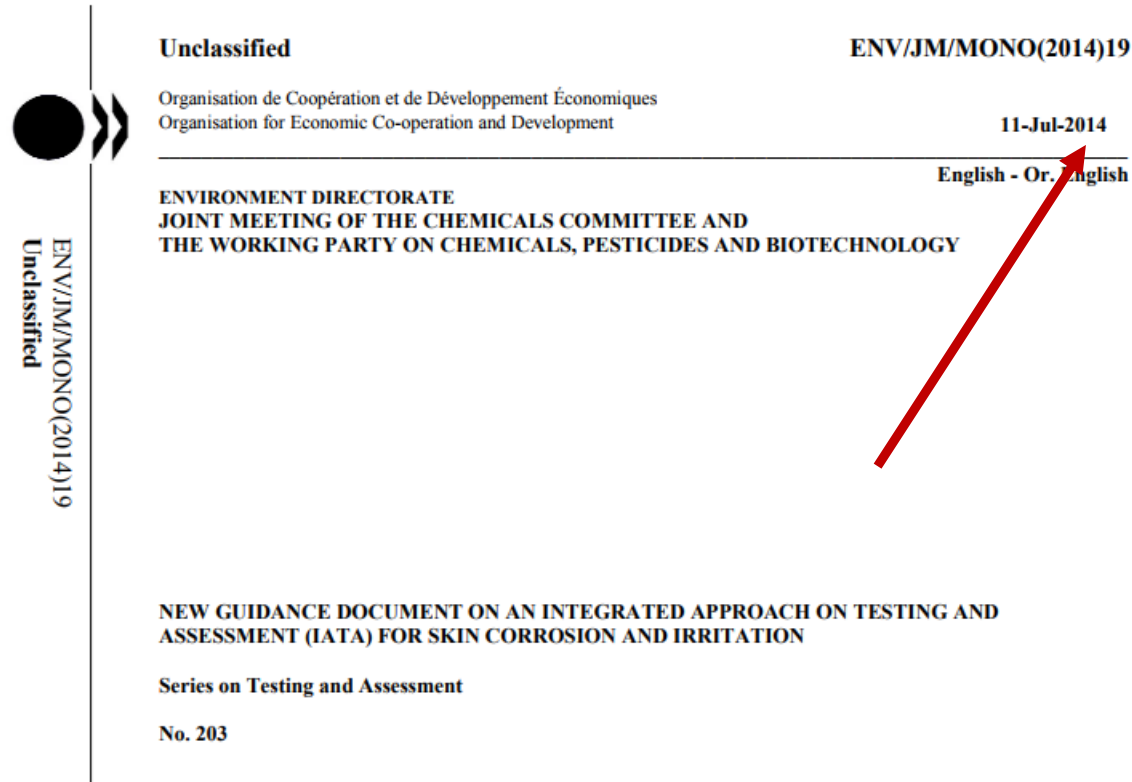
.....

If the results obtained from the use of such in vitro methods do not indicate a certain dangerous property, the relevant test shall nevertheless be carried out at the appropriate tonnage level to confirm the negative result, unless testing is not required in accordance with Annexes VII to X or the other rules in this Annex.

**Such confirmation may be waived**, if the following conditions are met:

- (1) results are derived from an in vitro method whose scientific validity has been established by a validation study, according to internationally agreed validation principles;
- (2) results are adequate for the purpose of classification and labelling and/or risk assessment; and
- (3) adequate and reliable documentation of the applied method is provided.

# OECD Guidelines



**OECD TG 430** – first publication in 2004  
***In Vitro* Skin Corrosion: Transcutaneous Electrical Resistance Test Method (TER)**

**OECD TG 431** – first publication in 2004  
***In Vitro* skin corrosion: reconstructed human epidermis (RHE) test method**

**OECD TG 435** – first publication in 2006  
***In Vitro* Membrane Barrier Test Method for Skin Corrosion**

**OECD TG 439** – first publication in 2010  
***In Vitro* Skin Irritation: Reconstructed Human Epidermis Test Method**

## COMMISSION REGULATION (EU) 2016/863

of 31 May 2016

amending Annexes VII and VIII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards skin corrosion/irritation, serious eye damage/eye irritation and acute toxicity

(Text with EEA relevance)

## Annex VII (< 10 t/y)

8.1. Skin corrosion/irritation	<p>8.1. The study/ies do(es) not need to be conducted if:</p> <ul style="list-style-type: none"><li>— the substance is a strong acid (<math>\text{pH} \leq 2,0</math>) or base (<math>\text{pH} \geq 11,5</math>) and the available information indicates that it should be classified as skin corrosion (Category 1), or</li><li>— the substance is spontaneously flammable in air or in contact with water or moisture at room temperature, or</li><li>— the substance is classified as acute toxicity by the dermal route (Category 1), or</li><li>— an acute toxicity study by the dermal route does not indicate skin irritation up to the limit dose level (2 000 mg/kg body weight).</li></ul> <p>If results from one of the two studies under point 8.1.1 or 8.1.2 already allow a conclusive decision on the classification of a substance or on the absence of skin irritation potential, the second study need not be conducted.</p>
8.1.1. Skin corrosion, <i>in vitro</i>	
8.1.2. Skin irritation, <i>in vitro</i>	



COMMISSION REGULATION (EU) 2016/863

of 31 May 2016

amending Annexes VII and VIII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards skin corrosion/irritation, serious eye damage/eye irritation and acute toxicity

(Text with EEA relevance)

Annex VII (< 10 t/y)

'8.1. Skin corrosion/irritation	<p>8.1. The study/ies do(es) not need to be conducted if:</p> <ul style="list-style-type: none"><li>— the substance is a strong acid (pH ≤ 2,0) or base (pH ≥ 11,5) and the available information indicates that it should be classified as skin corrosion (Category 1), or</li><li>— the substance is spontaneously flammable in air or in contact with water or moisture at room temperature, or</li><li>— the substance is classified as acute toxicity by the dermal route (Category 1), or</li><li>— an acute toxicity study by the dermal route does not indicate skin irritation up to the limit dose level (2 000 mg/kg body weight).</li></ul> <p>If results from one of the two studies under point 8.1.1 or 8.1.2 already allow a conclusive decision on the classification of a substance or on the absence of skin irritation potential, the second study need not be conducted.</p>
8.1.1. Skin corrosion, <i>in vitro</i>	
8.1.2. Skin irritation, <i>in vitro</i>	

Annex VIII (< 10 t/y)

An *in vivo* study for skin corrosion/irritation shall be considered only if the *in vitro* studies under points 8.1.1 and 8.1.2 in Annex VII are not applicable, or the results of these studies are not adequate for classification and risk assessment.



# Consistent IUCLID 6 Revision – *in vitro* Skin irritation / corrosion

**IUCLID 6**  
File Edit User Admin Plugins Help

(Search by UUID)

Navigation panel

Search TOC Annotations

REACH Registration 10 - 100 tonnes

Text filter

- 0 Related information
- 1 General information
- 2 Classification & Labelling and PBT assessment
- 3 Manufacture, use and exposure
- 4 Physical and chemical properties
- 5 Environmental fate and pathways
- 6 Ecotoxicological information
- 7 Toxicological information
  - 7.1 Toxicokinetics, metabolism and distribution
  - 7.2 Acute Toxicity
  - 7.3 Irritation / corrosion
    - 7.3.1 Skin irritation / corrosion
      - in vitro study**
      - 7.3.2 Eye irritation
    - 7.3.2 Eye irritation
  - 7.4 Sensitisation
  - 7.5 Repeated dose toxicity
  - 7.6 Genetic toxicity
  - 7.7 Carcinogenicity
  - 7.8 Toxicity to reproduction
  - 7.9 Specific investigations
  - 7.10 Exposure related observations in humans
  - 7.11 Toxic effects on livestock and pets
  - 7.12 Additional toxicological information
- 8 Analytical methods
- 11 Guidance on safe use
- 12 Literature search
- 13 Assessment reports
- 14 Information requirements

OECD / Skin irritation / corrosion / in vitro study / Chemical Watch substance **OECD**

Administrative data

Endpoint  
skin irritation: in vitro / ex vivo

Type of information  
experimental study

Adequacy of study  
key study

Robust study summary

Used for classification

Used for SDS

Study period  
October 2017

Reliability  
1 (reliable without restriction)

Rationale for reliability incl. deficiencies  
guideline study

Data waiving

Justification for data waiving

Information panel

Information Clipboard manager Attachments Modification history

Type  
Endpoint Study Record

UUID  
f2b4a7f0-f38b-4874-bfa8-cf738059e1f4

Dossier UUID

Origin  
IUC6

Pick list

Select a value

- skin corrosion: in vitro / ex vivo
- skin irritation: in vitro / ex vivo**
- skin irritation: in vivo
- skin irritation / corrosion, other

OK Cancel

# Consistent IUCLID 6 Revision – *in vitro* Skin irritation / corrosion

The screenshot displays the IUCLID 6 software interface. The main window shows the 'OECD / Skin irritation / corrosion / in vitro study / Chemical Watch substance' project. The left sidebar contains a navigation panel with a tree view of the study structure. The '7.3.1 Skin irritation / corrosion' section is expanded, and the 'in vitro study' sub-section is highlighted. The 'Test guideline' dialog box is open, showing the 'Qualifier' set to 'according to' and the 'Guideline' set to 'OECD Guideline 439 (In Vitro Skin Irritation: Reconstructed Human Epidermis Test Method)'. The 'Version / remarks' field is empty. The 'Pick list' dialog box is also open, showing a list of test guidelines. The 'Pick list' dialog box has a search filter and a list of guidelines. The 'Test guideline' dialog box has a red arrow pointing to the 'Add...' button in the 'Materials and methods' section of the main window.

**Navigation panel**

REACH Registration 10 - 100 tonnes

Text filter

- 0 Related information
- 1 General information
- 2 Classification & Labelling and PBT assessment
- 3 Manufacture, use and exposure
- 4 Physical and chemical properties
- 5 Environmental fate and pathways
- 6 Ecotoxicological information
- 7 Toxicological information
  - 7.1 Toxicokinetics, metabolism and distribution
  - 7.2 Acute Toxicity
  - 7.3 Irritation / corrosion
    - 7.3.1 Skin irritation / corrosion
      - in vitro study**
      - 7.3.2 Eye irritation
    - 7.4 Sensitisation
    - 7.5 Repeated dose toxicity
    - 7.6 Genetic toxicity
    - 7.7 Carcinogenicity
    - 7.8 Toxicity to reproduction
    - 7.9 Specific investigations
    - 7.10 Exposure related observations in humans
    - 7.11 Toxic effects on livestock and pets
    - 7.12 Additional toxicological information
  - 8 Analytical methods
  - 11 Guidance on safe use

**Materials and methods**

Test guideline

Qualifier: according to

Guideline: OECD Guideline 439 (In Vitro Skin Irritation: Reconstructed Human Epidermis Test Method)

Version / remarks:

**Pick list**

Select a value

OECD Guideline 404 (Acute Dermal Irritation / Corrosion)

OECD Guideline 430 (In Vitro Skin Corrosion: Transcutaneous Electrical Resistance Test Method (TER))

OECD Guideline 431 (In Vitro Skin Corrosion: Human Skin Model Test) before 26 Sept. 2014

OECD Guideline 431 (In Vitro Skin Corrosion: Reconstructed Human Epidermis (RHE) Test Method) from 26 Sept. 2014

OECD Guideline 435 (In Vitro Membrane Barrier Test Method for Skin Corrosion)

**OECD Guideline 439 (In Vitro Skin Irritation: Reconstructed Human Epidermis Test Method)**

EU Method B.4 (Acute Toxicity: Dermal Irritation / Corrosion)

EU Method B.40 (In Vitro Skin Corrosion: Transcutaneous Electrical Resistance Test (TER))

EU Method B.46 (In Vitro Skin Irritation: Reconstructed Human Epidermis Model Test)

EPA OPP 81-5 (Acute Dermal Irritation)

EPA OPPTS 870.2500 (Acute Dermal Irritation)

EPA OTS 798.4470 (Acute Dermal Irritation)

other:

OK Cancel

# Consistent IUCLID 6 Revision – *in vitro* Skin irritation / corrosion

Navigation panel

Search TOC Annotations

REACH Registration 10 - 100 tonnes

Text filter

0 Related information

1 General information

2 Classification & Labelling and PBT assessment

3 Manufacture, use and exposure

4 Physical and chemical properties

5 Environmental fate and pathways

6 Ecotoxicological information

7 Toxicological information

7.1 Toxicokinetics, metabolism and distribution

7.2 Acute Toxicity

7.3 Irritation / corrosion

7.3.1 Skin irritation / corrosion

in vitro study

7.3.2 Eye irritation

7.4 Sensitisation

7.5 Repeated dose toxicity

7.6 Genetic toxicity

7.7 Carcinogenicity

7.8 Toxicity to reproduction

7.9 Specific investigations

OECD / Skin irritation / corrosion / in vitro study / Chemical Watch substance

OECD

Duration of post-treatment incubation (if applicable)

Number of replicates

Test animals ^

Species

Strain

Details on test animals and environmental conditions

Test system ^

Type of coverage

Preparation of test site

Pick list

Select a value

funnel icon

rabbit

guinea pig

hamster

hamster, Armenian

hamster, Chinese

hamster, Syrian

monkey

mouse

pig

rat

other:

common species

other species

other species

other species

other species

other species

other species

other species

other species

OK

Cancel

# Consistent IUCLID 6 Revision – *in vitro* Skin irritation / corrosion

Validation assistant wizard

Validation assistant - Submission type specification

Dossier type

Select submission type

REACH Registration 10 - 100 tonnes

☐ Use advanced settings - select information to be checked based on confidentiality and regulatory programme flags

TCC_070301_A01	7.3.1	Skin irritation / corrosion	<p>To fulfill the information requirement for section 7.3.1 at the selected tonnage band, at least one record indicated as a key study, weight of evidence or data waiving must contain one of the following 'Endpoint' selections:</p> <ul style="list-style-type: none"><li>- skin corrosion: in vitro / ex vivo</li><li>- skin irritation: in vitro / ex vivo</li><li>- skin irritation / corrosion, other</li></ul> <p>If you select the endpoint 'skin irritation / corrosion, other', you are advised to provide further details in the adjacent text field on how this relates to the in vitro skin irritation / corrosion requirement.</p> <p>If an in vivo skin irritation study was carried out or initiated before the entry into force of the amendments to Annexes VII and VIII, you need to, in addition to the endpoint study record documenting the in vivo study, include a record with the 'Endpoint' selection 'skin irritation: in vitro / ex vivo', indicate it as a data waiving, and select the 'Justification for data waiving' option "an in vitro skin irritation study does not need to be conducted because adequate data from an in vivo skin irritation study are available".</p>	Completeness check	<div><div>Failure</div></div>
----------------	-------	-----------------------------	---	--------------------	-------------------------------

?

Provide the submission type information in order to determine the scenario of the validation.

Back

Next

Finish

Cancel

When the IUCLID file contains only in vivo information to cover the skin irritation / corrosion endpoint, the validation test fails, even if the submitted test was performed much before the validation of the *in vitro* tests

# Consistent IUCLID 6 Revision – Waiving *in vitro* when *in vivo* exists

IUCLID 6

File Edit User Admin Plugins Help

Navigation panel

Search TOC Annotations

REACH Registration 10 - 100 tonnes

Text filter

- 0 Related information
- 1 General information
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- 7 Toxicological information
  - 7.1 Toxicokinetics, metabolism and distribution
  - 7.2 Acute Toxicity
  - 7.3 Irritation / corrosion
    - 7.3.1 Skin irritation / corrosion
      - in vivo study
      - waive
    - 7.3.2 Eye irritation
  - 7.4 Sensitisation
  - 7.5 Repeated dose toxicity
  - 7.6 Genetic toxicity
  - 7.7 Carcinogenicity
  - 7.8 Toxicity to reproduction
  - 7.9 Specific investigations
  - 7.10 Exposure related observations in humans

Administrative data

Endpoint

Type of information

Adequacy of study

☐ Robust study summary

☐ Used for classification

☐ Used for SDS

Study period

Reliability

Rationale for reliability incl. deficiencies

Data waiving

Justification for data waiving

Justification for type of information

The validation test is successful, if there is a new record to waive the *in vitro* test. Suitable justification is necessary

study scientifically not necessary / other information available

an in vitro skin irritation study does not need to be conducted because adequate data from an in vivo skin irritation study are available

# What do we need?



<b>Skin irritation</b>	
Not irritant	
Category 2 – H315 Causes skin irritation	
Category 2 – H315 Causes skin irritation	
Category 1 – H314 Causes severe skin burns and eye damage	



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Know the rules, play your market.





# What do we need?



Skin irritation	Eye irritation
Not irritant	Not irritant
Category 2 – H315 Causes skin irritation	Category 2 - H319 Causes serious eye irritation
Category 2 – H315 Causes skin irritation	Category 1- H318 Causes serious eye damage
Category 1 – H314 Causes severe skin burns and eye damage	

## CLASS 8 CORROSIVE SUBSTANCES

Category 1A / 1B / 1C (Packing group I, II, III)

<https://adrbook.com/en/2017/ADR/2.2.8>

# What do we need?



Skin irritation	Eye irritation
Not irritant	Not irritant
Category 2 – H315 Causes skin irritation	Category 2 - H319 Causes serious eye irritation
Category 2 – H315 Causes skin irritation	Category 1- H318 Causes serious eye damage
Category 1 – H314 Causes severe skin burns and eye damage	

## CLASS 8 CORROSIVE SUBSTANCES

Category 1A / 1B / 1C (Packing group I, II, III)

<https://adrbook.com/en/2017/ADR/2.2.8>

**Classified substances > 10 t/y**  
Hazard Assessment Conclusion  
for the Exposure Scenarios  
**Low / Medium / High**  
(no threshold derived)



How to undertake a qualitative  
human health assessment and  
document it in a chemical safety  
report  
**Practical Guide 15**

# What's next?

**We have a set of in vitro tests  
for the definition of the  
skin irritation potential**

**We need to fulfil  
some defined requirements**



# Guidance on Information Requirements and Chemical Safety Assessment

## Chapter R.7a: Endpoint specific guidance

Version 5.0

December 2016

[https://echa.europa.eu/documents/10162/13632/information\\_requirements\\_r7a\\_en.pdf](https://echa.europa.eu/documents/10162/13632/information_requirements_r7a_en.pdf)

**Section R.7.2**  
**Skin corrosion/irritation,**  
**serious eye damage**  
**irritation and respiratory**  
**tract corrosion/irritation**

**Figure R.7.2–2**

# Testing and assessment strategy

*physico-chemical properties:*

1c. Is the pH of the substance  $\leq 2.0 \geq 11.5$ ?<sup>a</sup>

1d. Are there other physical or chemical properties that indicate that the substance is corrosive/irritant?



Measure of many physical and chemical properties is mandatory for any dossier: do it immediately to “get to know” your substance



# Testing and assessment strategy

*Existing human data:*

2. Are there adequate existing human data which provide evidence that the substance is a corrosive or irritant?



- Occupational exposure
- (consumer exposure)





# Testing and assessment strategy

*Existing animal data:*

3. Are there data from existing studies *on corrosion and irritation* in laboratory animals, which provide sound conclusive evidence that the substance is a corrosive, irritant or non-irritant?



Analysis of existing in vivo studies for one substance (From the ECHA public database)				
Year	Method	Species	Klimisch score	Results
1988	OECD 404	Rabbit	1	Slightly irritant
1977	24h exposure	Rabbit	3	Corrosive
1962	review article	Guinea Pig	4	Irritant
1981	24h exposure	Rabbit	3	Corrosive
1972	24h exposure	Rabbit	4	Irritant
1977	corrosivity screen	Rabbit	4	Not corrosive

ALTEX. 2016;33(2):123-34.  
doi: 10.14573/altex.

# Testing and assessment strategy

*Existing/new (Q)SAR data and read-across:*

**5a/b.** Are there structurally related substances (suitable “read-across” or grouping), (...), or do suitable (Q)SAR methods indicate corrosion /irritant /not irritant potential of the substance?



Read-Across Assessment  
Framework (RAAF)

[www.qsartoolbox.org](http://www.qsartoolbox.org)

[https://echa.europa.eu/documents/10162/13628/raaf\\_en.pdf](https://echa.europa.eu/documents/10162/13628/raaf_en.pdf)

# Testing and assessment strategy

*Existing in vitro data:*

...

6c: Are there data from (a) non-validated suitable in vitro test(s), which provide sound conclusive evidence that the substance is corrosive/ irritant?

[www.estiv2018.org](http://www.estiv2018.org)



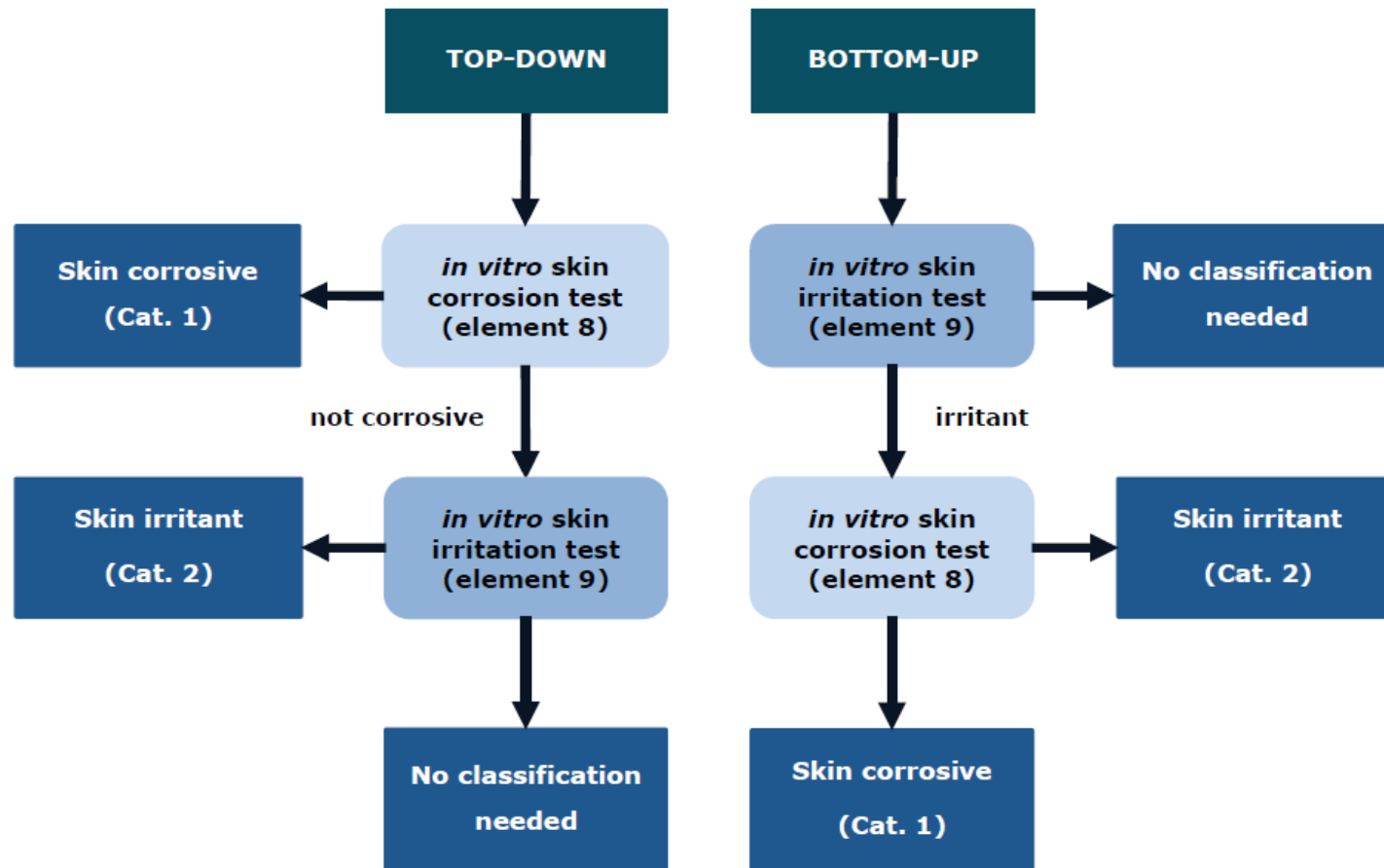
20<sup>th</sup> International Congress  
on In Vitro Toxicology

15–18 October 2018  
Estrel Hotel Berlin

# Chapter R.7a: Endpoint specific guidance

Version 5.0 – December 2016

## R.7.2 Skin corrosion/irritation, serious eye damage/eye irritation ...



**Figure R.7.2–3**  
Schematic presentation of  
Top-down and Bottom-up  
approaches for  
Skin Corrosion/irritation

# IATA for skin irritation in practice

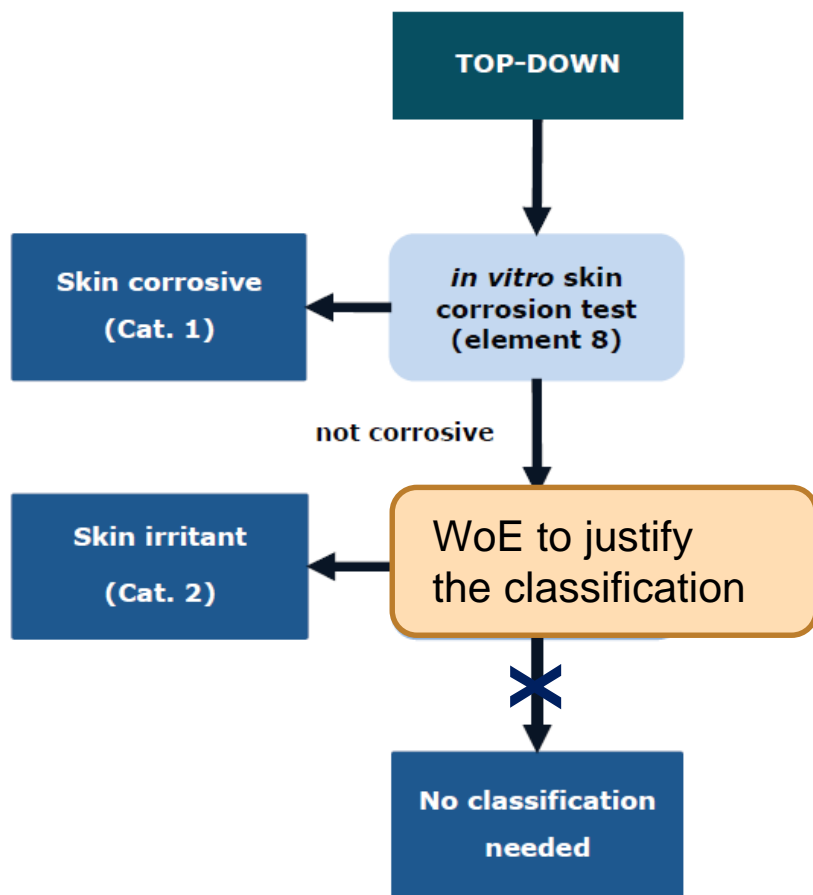
The preliminary assessment of the substance can foresee the possible hazard very often. This defines whether to apply the Bottom-up or Top-down approach and usually one experiment is enough to get to a conclusion.

Main parameters to select the starting test are:

- pH – how much the substance is far from skin natural pH (about 5)
- MW and Kow – low interaction at high values
- Stability
- Other chemical properties (surfactant, chelating agent, and so on)
- Existing test on eye irritation
- Other existing toxicity tests
- QSAR modelling
- Anything else that may contribute to the general knowledge of the substance properties



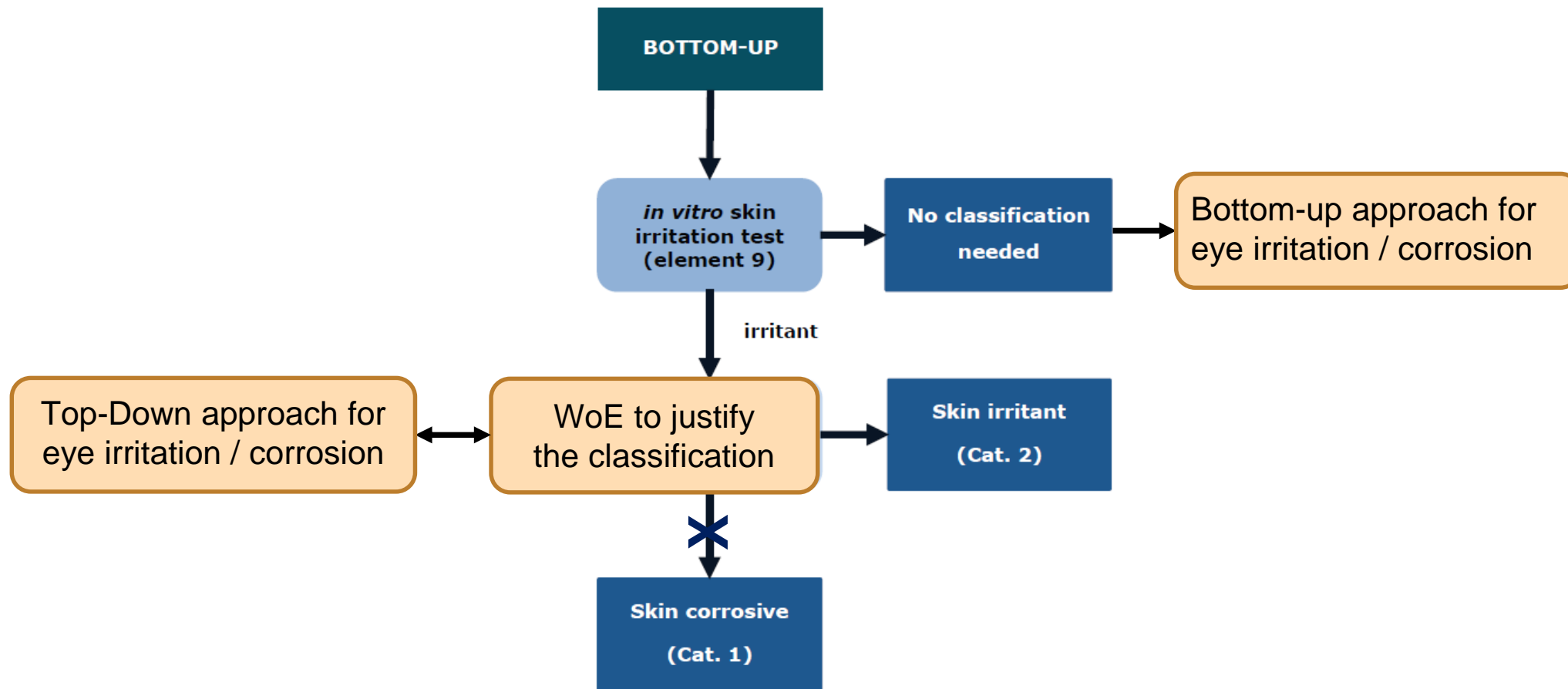
# Typical top-down approach



Very often, the corrosivity hazard is well known and the test is performed to assigned the correct packing group for transport (ADR), according to OECD Guidance document 203 on IATA.

The preliminary general assessment may also generate an alert. In this case the test is performed to discriminate between Cat. 1 and 2. Confirmation of Category 2 derives from other source of information

# Typical Bottom-up approach



# Conclusion

- Start from the regulatory framework
- There is no unique instructions and even simple tiered strategy should be tailored to the specific substance and the specific use
- Assessment of the substance should be performed globally, not endpoint by endpoint
- Interpretation of all available results, avoid just adding the conclusions from each single study report
- Look at cost and simplicity

- Please submit questions during the webinar using your chat box.
- Any unanswered questions can be raised in the **Chemical Risk Manager** LinkedIn group following the webinar:

[www.chemicalwatch.com/CRM-LI](http://www.chemicalwatch.com/CRM-LI)

# Speakers



- **Dr Gertrude-Emilia Costin** - Gertrude-Emilia is the manager of scientific services at the Institute for In Vitro Sciences, Inc (IIVS). In her role as study director, she is in charge of a wide variety of safety and efficacy commercial studies based on in vitro test systems. Her main area of expertise is the use of in vitro test methods for the dermal safety assessment of ingredients and final formulations manufactured by the personal-care or pharmaceutical industries as well as that of products to be registered under the US Federal Insecticide, Fungicide, and Rodenticide Act, which is regulated by the US Environmental Protection Agency.



- **Dr Costanza Rovida** – Costanza is a chemist working as a scientific officer at the Center for Alternatives to Animal Testing–Europe (CAAT-Europe) and a project manager for TEAM Mastery. Convinced that in vivo methods are not the right scientific answer to our toxicological questions, from 2005 to 2008, she worked at the European Centre for the Validation of Alternative Methods, where she gained experience in the application of alternative methods in the area of skin and respiratory sensitisation.

**Chair – Name – Job Title - Organisation**



# Thank you for attending

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**NEXT**

- **Skin Sensitisation – Free Webinar – 1 February – 4:00pm-5:30pm GMT**
- **Chemistry for the Non-Chemist – Training Webinar – 6 February – 2:00pm-4:00pm GMT**

**Please note, a recording and a copy of the presentation slides will be made available to those registered in the next few days!**