Combining exposure assessment and effect assessment by TKTD models

Andreas Focks, Maria Arena, Theo Brock, Nina Cedergreen, Sandrine Charles, Sabine Duquesne, Alessio Ippolito, Michael Klein, Melissa Reed, and Ivana Teodorovic

Brussels, 23. October 2018









Overview

- Regulatory environment
- Short overview general TKTD
- Evaluation of GUTS usage in the scope of regulatory risk assessment
- Linking GUTS to existing guidance
- Outlook





Regulatory background

- 2008: the Panel on Plant Protection Products and their Residues (PPR) was tasked by EFSA with the revision of the Guidance Document on Aquatic Ecotoxicology under Council Directive 91/414/EEC
- In 2013, "Aquatic guidance document" was published, focus on experimental approaches for pelagic water organisms, already indicating that mechanistic effect models could be used within the tiered approach

∃cological



SCIENTIFIC OPINION

Guidance on tiered risk assessment for plant protection products for aquatic organisms in edge-of-field surface waters¹

EFSA Panel on Plant Protection Products and their Residues (PPR)^{2,3}

European Food Safety Authority (EFSA), Parma, Italy





Specific Protection Goal _Tier-4:⊲ RAC_{sw:ac} – derivation RAC_{sw:ch} – derivation Field studies and (linked to PEC_{sw:max} (linked to PEC_{sw:max}) landscape level or PEC_{sw·twa}) models Tier-3: Population and community level experiments and models Tier-2: Acute lab tests Tier-2: Chronic lab tests with additional species and/or refined exposure with additional species and/or refined exposure Tier-1: Core acute toxicity data Tier-1: Core chronic toxicity data

Complexity (data)

Chronic Effect Assessment

Acute Effect Assessment

Scientific opinion (SO) on modelling - which models?

- Initially, SO should cover general mechanistic effect models (MEM) as tools for the prospective effect assessment procedures for aquatic organisms

 on all higher tiers – for individuals, populations, communities...
- Due to huge variety of MEM, their different developmental stages, and open issues with the use of such models for higher tier ERA (e.g. competition, alternative stable states, etc) constrained focus on TKTD models as Tier-2 tools

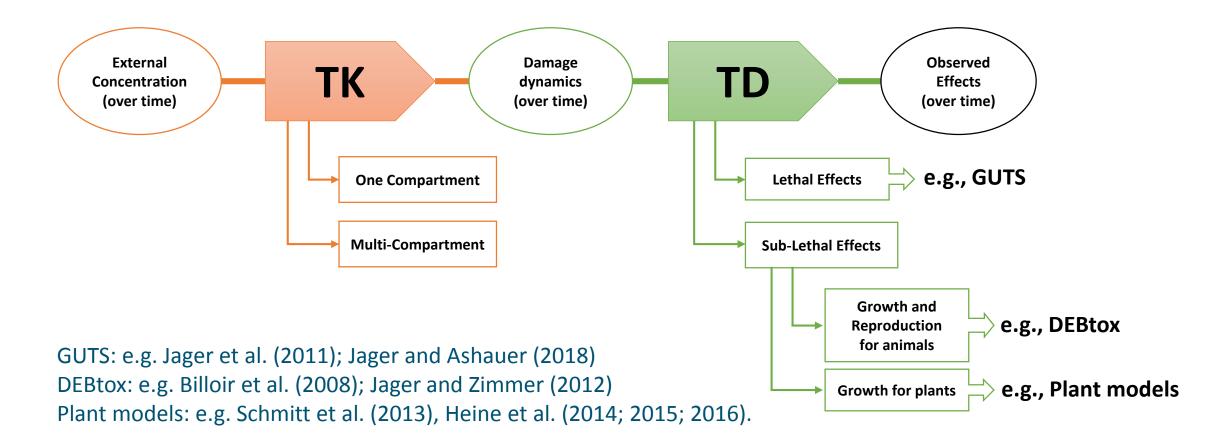


- Stage of development of TKTD models was considered being close to allowing appropriate use in the prospective environmental risk assessment for pesticides, particularly to predict potential risks of time-variable exposures on aquatic organisms
- An EFSA working group developed a scientific opinion about TKTD models for aquatic organisms between December 2016 and May 2018





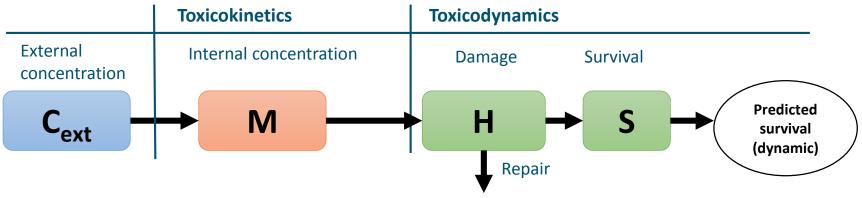
TKTD models - principles







GUTS: General Unified Threshold models of Survival



- Uptake processes:
 - Diffusion across membranes
 - Filtration via breathing organs
- Distribution
- Biotransformation
- Excretion

- Damage
- □ Repair/recovery
- Mortality: Probability not to survive increases with increasing damage

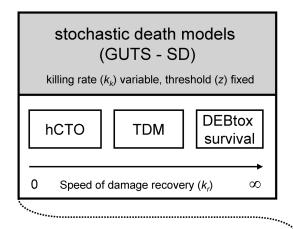
Jager, Albert, Preuss,
Ashauer (ES&T 2011):
Development of General
Unified Threshold models
of Survival as
comprehensive theoretical
foundation for TKTD
models of survival

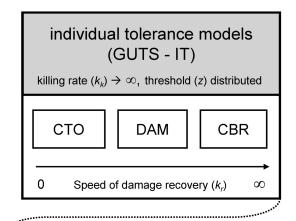
Toxicodynamics-extreme cases: Stochastic death (SD) Individual tolerance (IT)





Two models for survival – why?





General Unified Threshold model of Survival (GUTS) (mixture of SD and IT)

killing rate (k_k) variable, threshold (z) distributed, speed of damage recovery (k_r) variable

From Jager et al. (2011):

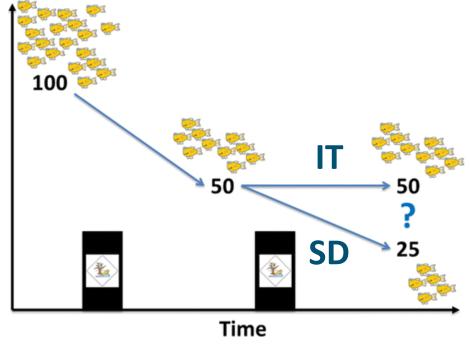
Toxicodynamics-extreme cases:

Stochastic death (SD): Threshold fixed, killing rate variable Individual tolerance (IT): Threshold distributed, immediate killing

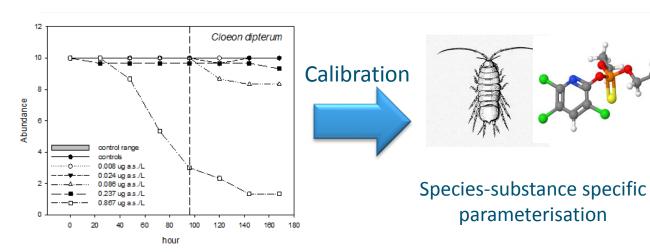




Death Dilemma and Organism Recovery in Ecotoxicology (Ashauer et al., 2015)



How GUTS modelling works: Calibration, prediction, validation



egime



ic

Water concnetration (ug/L)

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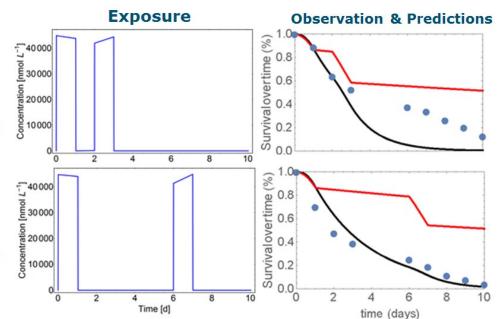
2.

Survival under time-variable exposure

Survival under static exposure: standard ecotox tests

Validation: specific experiments,
Testing model predictions of survival in experiments

WAGENIN





3.5E-5

Extrapolation of Effects Across Biological Levels: Challenges to Implement Scientific Approaches in Regulation

Evaluation of GUTS usage in regulatory risk assessment

- Follows structure as elaborated in EFSA scientific opinion on 'Good Modelling Practice':
- TKTD SO formulates methods and examples for the evaluation of
 - Problem definition
 - Quality of the supporting experimental data
 - Conceptual model
 - Formal model
 - Computer model
 - Regulatory model (environmental scenarios, parameter estimation)
 - Model analysis (Sensitivity and uncertainty analysis, validation)
 - Model use

Some aspects are in the TKTD SO evaluated for GUTS models in general

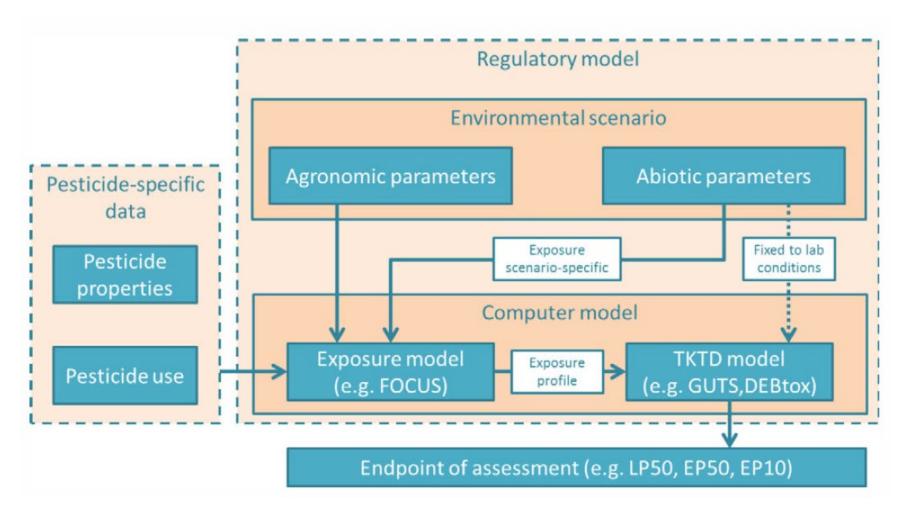
Other aspects have to be tested and documented per GUTS **implementation**

Some aspects remain to be tested and documented for each GUTS application





Regulatory model for GUTS



- Environmental scenario feeds into exposure model.
- Exposure profile is used as input by the TKTD models.
- TKTD output gives endpoint of assessment



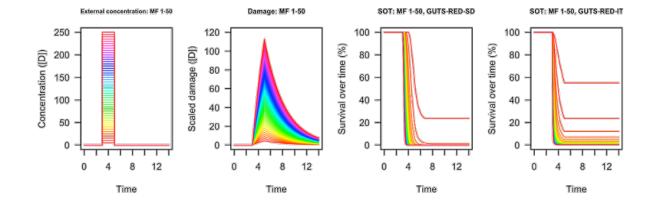


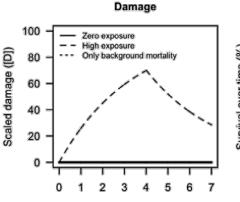


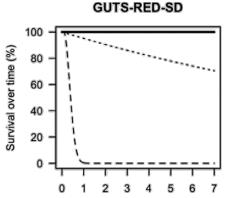
Checking the implementation of GUTS models: three lines of evidence

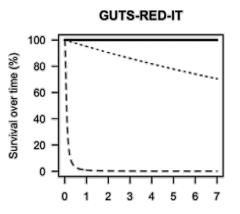
- 1. Test against the ring-test data set (Jager and Ashauer, 2018).
- 2. Test of a set of scenarios (default, pulsed and 'extreme' cases);
- 3. Test model output with an independent implementation of GUTS

In addition, availability of the computer code allows further implementation check by experts















Model validation

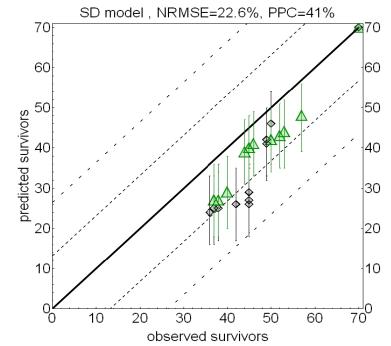
- Validation data: have not been used for model calibration, provide relevant output (for GUTS simulated mortality probability over time and LPx/EPx values).
- Special consideration of vertebrates (reduction of vertebrate testing).
- Three different quantitative criteria suggested, to be considered in combination, applicable for both frequentist and Bayesian approaches
 - 1. Posterior predictive check (PPC): uncertainty
 - 2. Normalised Root Mean Square Error (NRMSE): match over time
 - 3. Survival Probability Prediction Error (SPPE): match of final survival
- All criteria deliver absolute indicator values (percentages) which can be interpreted and compared with thresholds

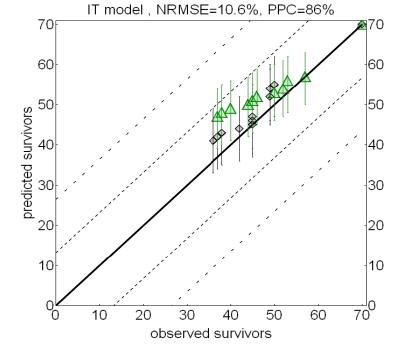




Quantification of prediction quality: Posterior predictive check (PPC)

- PPC based on Bayesian statistics
- Compares predicted mean number of survivors with observed numbers under specific consideration of uncertainty in the model predictions.





PPC between 50 and 90% indicates appropriate uncertainty ranges







Quantification of prediction quality: NRMSE und SPPE

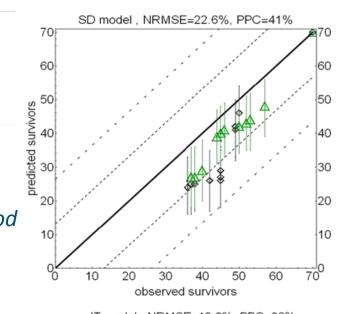
Normalised RMSE :

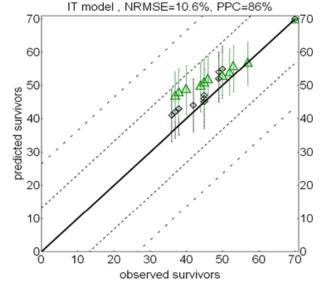
$$NRMSE = \frac{RMSE}{\bar{Y}} = \frac{1}{\bar{Y}} \sqrt{\frac{1}{n} \sum_{i=1}^{n} \left(y_{obs,i} - y_{pred,i}\right)^2}$$
 $NRSME$ below 30-50% indicate good prediction of survival over time with $\bar{Y} = \frac{1}{n} \sum_{i=1}^{n} y_{obs,i}$ as mean of n observed survivors $y_{obs,i}$.

 Survival probability prediction error (SPPE): Evaluation of survival probabilities between beginning and end of validation experiments

$$SPPE = (\frac{y_{obs,tend}}{y_{init}} - \frac{y_{modelled,tend}}{y_{init}}) * 100 = \frac{y_{obs,tend} - y_{modelled,tend}}{y_{init}} * 100$$

SPPE below 0% indicate underestimation of mortality. SPPE between 0 und 30-50% can be considered to show good prediciton of final mortalities.

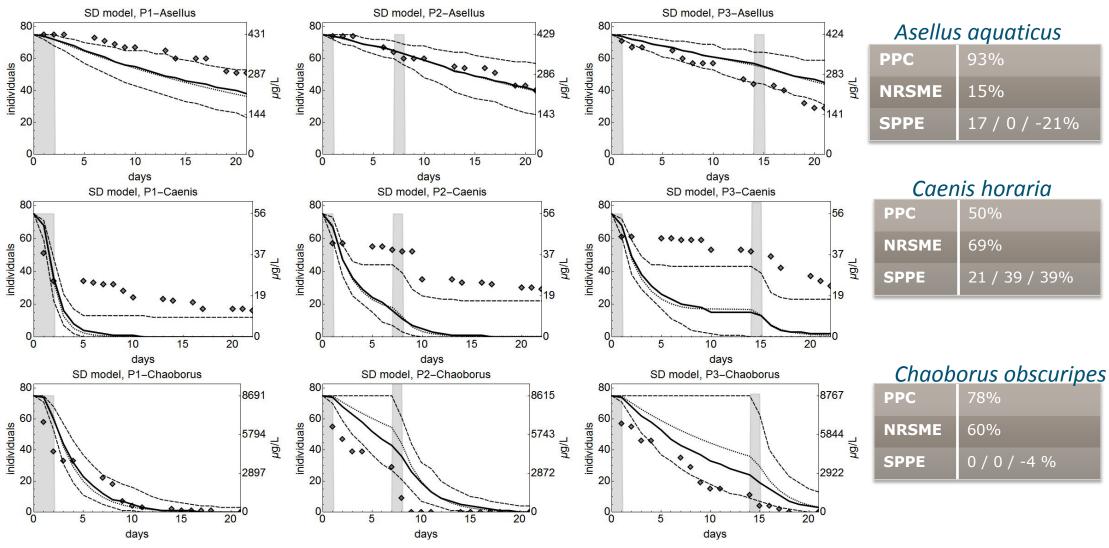








Example validation results: Imidacloprid







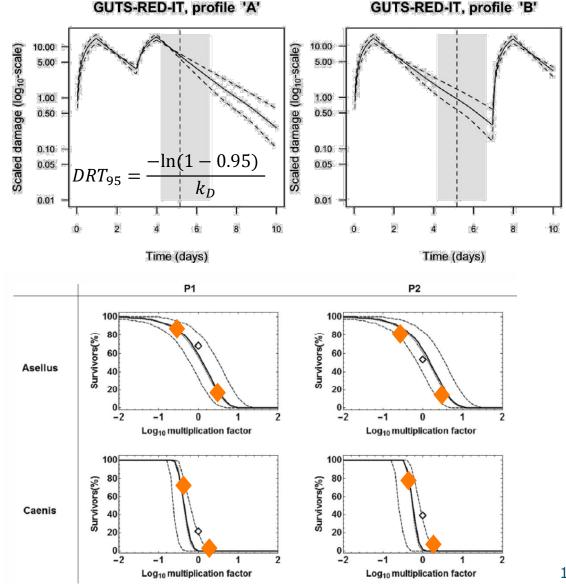
Focks et al., Ecotoxicology (2018)



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Challenges to Implement Scientific Approaches in Regulation

Requirements for validation data

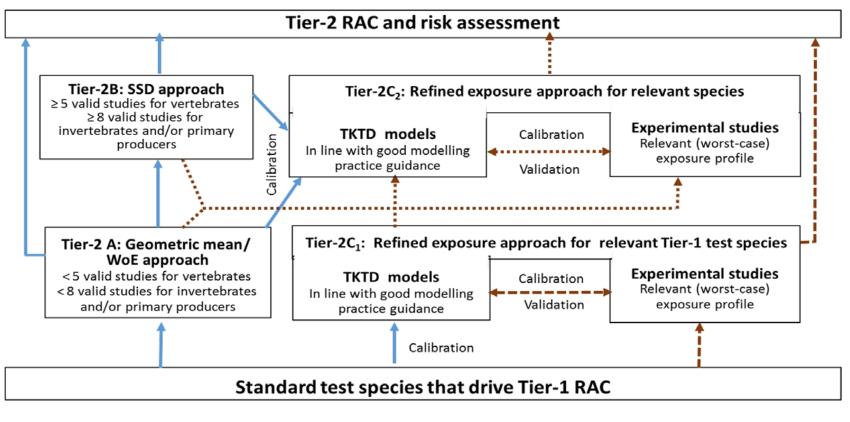
- Effect data from experiments under time-variable exposure
- At least two exposure profiles with at least two pulses each, separated by no-exposure intervals of different duration length; defined based on DRT95
- Exposure specific dose-response curves are at least tested at three concentration levels (low, medium, high)







Linking GUTS with current risk assessment guidance



 Predictions of validated GUTS as alternative to experiments with refined exposure in Tier 2

Solid blue lines Standardised exposure:
Experimental studies with standard and/or additional test species and exposure conditions in line with Tier-1 tests (worst-case approach)

Broken lines

Refined exposure (Tier-2C₁):
Refined exposure (Tier-2C₂):
Tests with standard and/or additional species and refined exposure conditions informed by predicted field exposure profiles

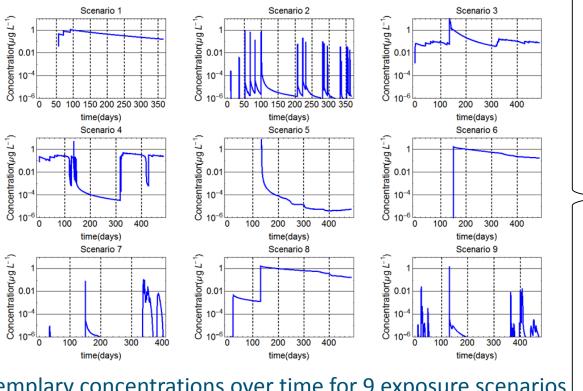




Relevant endpoints

INIVERSITY & RESEARCH

- Exposure profile specific effects on survival over time: final mortality
- In almost all cases, no effects of time-variable exposure scenarios as of exposure assessment in GUTS evaluations



No effects of propiconazole on survival of Gammarus pulex predicted by calibrated and validated GUTS

– End of the assessment?

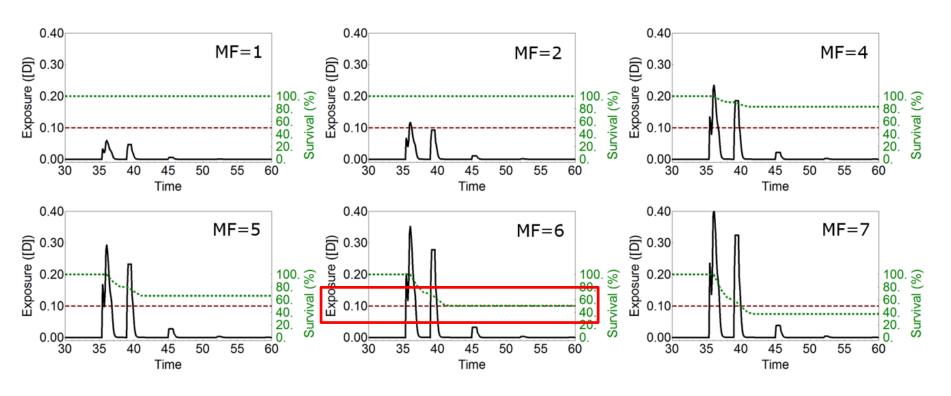
Exemplary concentrations over time for 9 exposure scenarios





Profile-specific multiplication factors

How 'far' is the exposure profile from causing a defined effect?



Profile-specific factor leading to 50% mortality at the end:

$$LP_{50} = 6$$

Multiplication of whole exposure times series with factors results in that factor leading to a certain effect level, e.g. 50%, at the end of the tested profile: LP_{50} .





Application of the LPx concept

apple

R1 pond

1.130

17

17

17

Lethal profile (LP_{50}) for mortality, Effect profile (EP_{50}) for immobility. Analogy to LC_{50} or EC_{50} of lab test under static exposure, is intended, but LC_X/EC_X are concentrations, while LP_X/EP_X are factors \rightarrow can be compared with toxicity exposure ratios.

apple

R2 stream

2.007

10

44

49

P ₅	o)	Concentration(µg L ⁻¹)		Concentration(µg L ⁻)		, , , , , , , , , , , , , , , , , , ,	0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01		
e		O 10 ⁻⁶ 0 100 200 3	300 400	Ŭ 10 ⁻⁶ ს	100 200 300 4	400	3 10 ⁻⁶	100 200 30	00 400
		time(day	/s)		time(days)			time(days	s)
		Scenario		_	Scenario 8		_	Scenario	9
•		Ouceutration 0.01	300 400	Concentration(µg L ⁻)	100 200 300 4 time(days)	400	0.010 0.01 10-4 10-6 0	100 200 3 time(days	00 400
	4	5	6		7	8	3	(9
	cereals	cereals	cereals	5	cereals	cere	eals	cer	eals
	D1 stream	D3 ditch	D4 pon	d D	4 stream	D5 p	ond	D5 st	ream
	8.063	9.083	1.668		2.268	1.6	70	2.4	101

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Scenario 5

205

250

time(days)

Scenario 4



Scenario

 PEC_{max}

Application

FOCUS SW scen.

'1st tier' TER

MF₅₀ SD model

MF₅₀ IT model



cereals

D1 ditch

10.564

3

20

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12

16

LP₅₀ values differentiate risk between constant and highly variable exposure profiles!

8

195

237

200 300

11

12

12

time(days)

Scenario 6

Evaluation of GUTS applications

- Identification of application specific and unspecific elements in the GMP documentation (unspecific = can be documented as default)
- Clear criteria for the evaluation of specific documentation elements, checklist and examples for risk assessors





Annex A - Checklist for GUTS models

application for lethal effects	ASPECT OF THE MODEL TO BE EVALUATED BY THE RISK ASSESSOR – GUTS model			

1. Evaluation of the problem definition

The problem definition needs to explain how the modelling fits into the risk assessment and how it can be used to address the specific protection goals. For GUTS, questions to be answered are likely to be those that are set out in Chapter 3. Nevertheless, the problem definition should make clear the following points:

	3	
(a)	Is the regulatory context for the model application documented?	
(b)	Is the question that has to be answered by the model clearly formulated?	
(c)	Is the model output suitable to answer the formulated questions?	
(d)	Was the choice of the test species clearly described and justified, also considering all the available valid information (including literature)?	
(e)	Is the species to be modelled specified? – Is it clear whether the model is being used with a Tier-1 test species i.e. Tier-2C ₁ or with one or more relevant species (which might include the Tier-1 species) i.e. Tier-2C ₂ ?	

2. Evaluation of the quality of the supporting experimental data

In this part of the evaluation, it is checked whether the experimental data with which the model is compared (both calibration and validation data sets) have been subjected to quality control. The focus is on the data quality, i.e. the laboratory conditions, set-up, chemical analytics and similar. Additional specific criteria for the suitability of the data sets for model calibration and validation are evaluated later in more detail (Sections 7 and 9 of this checklist).

(a) Has the quality of the data used been considered and documented? (see list of OECD test guidelines in Chapter 7, Table 6)
 (b) Have all available data been used (either for calibration or for validation)? If not, is there a justification why some information has not been used?
 (c) Is it checked whether the actual exposure profile in the study matches the intended profile in the test (+/- 20%); if not, are then measured concentrations used for the modelling, instead of nominal ones?

3. Evaluation of the conceptual model

Providing GUTS models are being used to address mortality/immobility effects in fish or invertebrates, the conceptual model will be suitable to address the specific protection goals; so, no further evaluation is required (see Chapters 2.1, 2.2 and 4.1).

4. Evaluation of the formal model

The formal model contains the equations and algorithms to be used in the model. For GUTS models, the equations are standardised, so that no further check is necessary (see Chapter 4.1.1). It has to be documented, however, which GUTS model version is used (e.g. full or reduced model).

5. Evaluation of the computer model

be run?

The formal model is converted into a model that can run on a computer (the computer model). For GUTS models, the computer model can be tested by showing the model performance for the GUTS ring-test data and performing some further checks (see Section 7.5).

(a)	Is the used implementation of GUTS tested against the ring-test data set (see Section 4.2)?	
(b)	Were GUTS parameters estimated for the ring-test data and compared to the reference values, including confidence or credible intervals (Appendices B.6 and B.7)?	
(c)	Is a set of default scenarios (e.g. standard scenarios, extreme cases, see Section 4.1.2) simulated and checked?	21
(d)	Are all data and parameters provided to allow an independent implementation of GUTS to	

Recent examples of implementation of science into regulation: what makes the TKTD SO a good example?

- Interdisciplinary and open-minded working group
- Mature, nearly standardised GUTS theory and relatively simple formal model
- A certain number of application examples for GUTS and pesticides
- Definition of modelled endpoints which tie directly to the existing regulatory system (e.g. same assessment factors are suggested)
- Outlook: Calibration and fine-tuning of the suggested procedures for GUTS, e.g. practicability of the validation data suggestions, threshold values for model validation quality indicators





Outlook - DEBtox

- DEBtox models are promising and seen as very relevant for assessment of 'chronic'/sublethal effects under time-variable exposure
- DEBtox applications are still developed on a more case-by-case basis, there is no 'standard DEBtox' terminology nor formal model
- The number of application examples of DEBtox modelling for assessing pesticide effects in the literature is increasing, but still very low
- Due to the model complexity, model calibration is a rather demanding task which requires in-depth statistical knowledge
- Evaluation of any application is complicated by DEBtox models having a DEB component and a TKTD component – it is unclear who could be able and eligible to evaluate the DEB model part





Outlook – models for primary producers

- **Algae model**: model is simple, but flow-through experimental setup used for validation is not standardised, nor robustness check of the setup been ring-tested.
- The **Lemna model** can, when properly tested and documented, be used to evaluate effects of predicted exposure profiles in Tier-2C, if Tier-1 Lemna is the only standard test species triggering a potential risk
- Published Myriophyllum modelling approach may be a good basis to further develop TKTD models for rooted submerged macrophytes, needs further standardisation, documentation, calibration and validation.
- Growth models, particularly for Myriophyllum, would benefit from detailed experimental analysis of uptake, transport and elimination processes of organic contaminants.
- A modification of the standard Lemna and Myriophyllum experimental tests by including more frequent monitoring of growth and a recovery phase would provide valuable data for initial fits of plant models.





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Thank you for your attention!



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