



SOT FDA Colloquia on Emerging Toxicological Science Challenges in Food and Ingredient Safety

Developmental Neurotoxicity Testing: An Introduction to the State of the Science and Opportunities for Improvement

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Conflict of Interest Statement

- I declare no conflicts of interest.

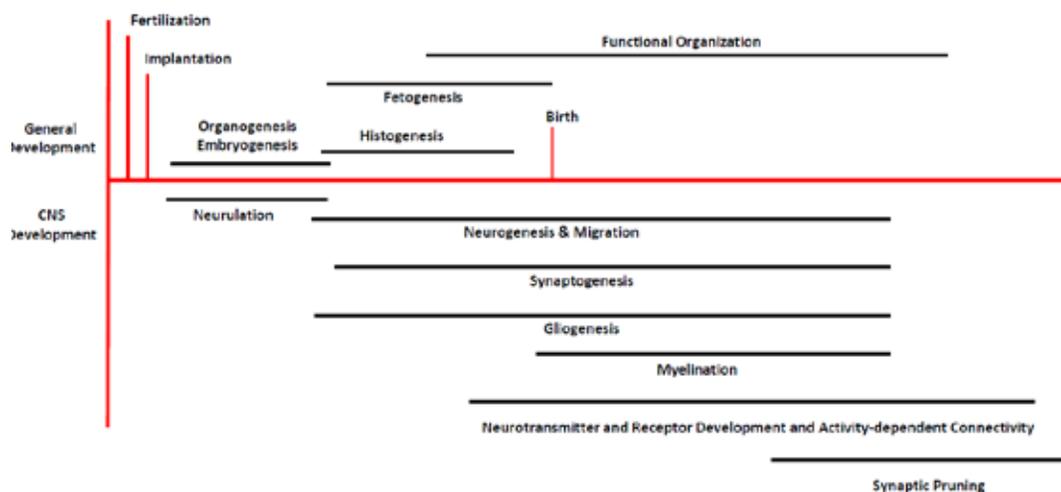




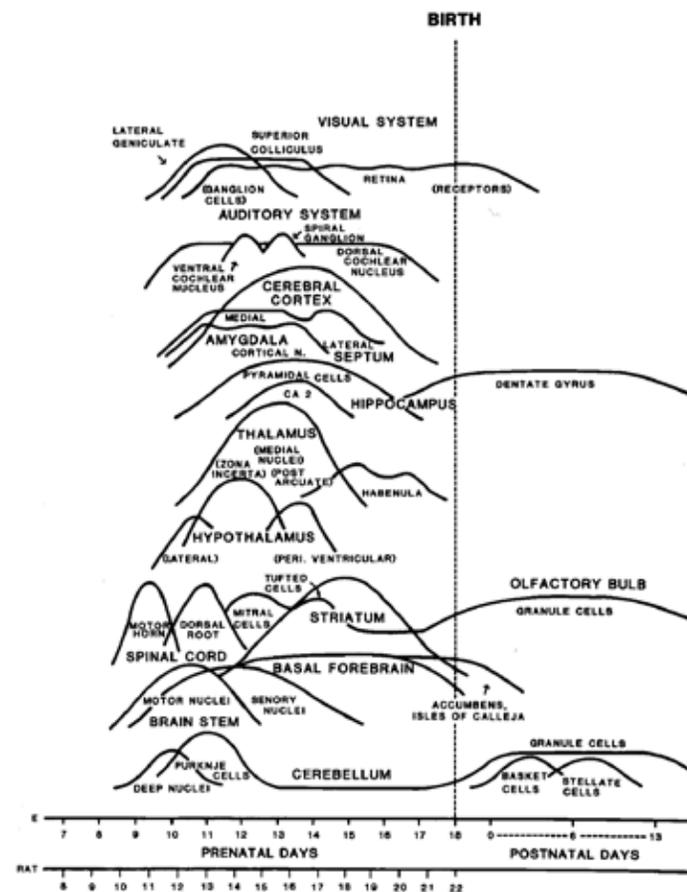
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Brain Development

Comparison of Major Organ Development vs. CNS Development



Adapted From: Vorhees, C.V. (1994) In: Principles of Neurotoxicology, Change, L.W (ed.), Marcel Dekker, Inc., pp. 733-763.

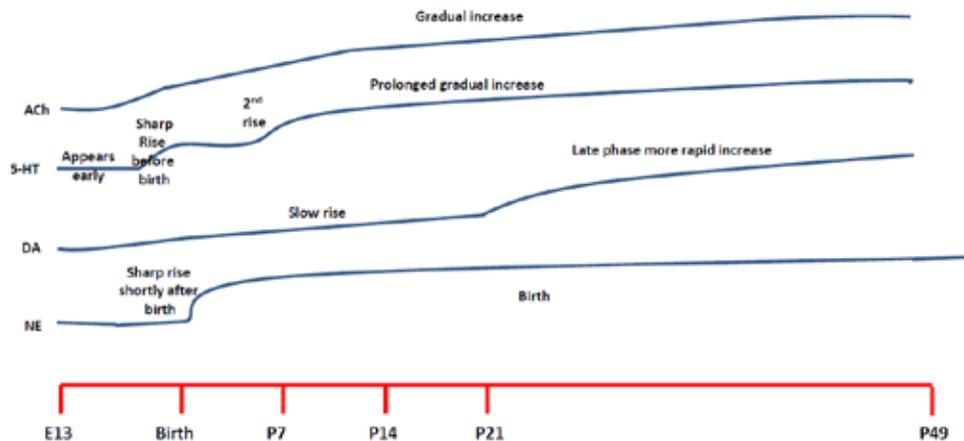


From: Rodier, P.M. (1980), *Dev. Med. Child Neurol.*, **22**, 525-545; modified by Vorhees, C.V. (1986) in Handbook of Behavioral Teratology, Riley, E.P. & Vorhees, C.V. (Eds.), Plenum Press, pp. 23-48.



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Neurotransmitter ontogeny



Loosely adapted From: Herlenius, E. & Lagercrantz, H. (2004). *Exp. Neurol.*, **190**, 58-521.

Translatingtime.net

- Human gestation 270 d (38.5 wks)
- 1st trimester 0-13 wks
- 2nd trimester 13-26 wks
- 3rd trimester 26-38.5 wks
- rat gestation = 21 days
- PC = post-conception day

Neurogenesis

Human PC 8 wks translates to Rat E15

Human PC 13 wks translates to Rat **E19**

Human at PC 24 wks translates to Rat **P5**

Human PC 38 wks translates to Rat **P10-19** (**no day of exact birth equivalency**)

This does not to account for:

- Apoptosis
- Synaptogenesis
- Synaptic pruning
- Myelinogenesis
- And other events in brain development

Complexity of brain development creates assessment challenges that DNT was not intended to solve



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**How has the Complexity of CNS Development
been Translated into the Design of DNT Studies?**



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How has the Complexity of CNS Development been Translated into the Design of DNT Studies?

A: It hasn't!

DNT studies have been defaults:

- Simplistic observations
- Movement (open-field)
- Acoustic startle response (ASR)
- Rudimentary learning
- Basic memory

Why?

1. When written there were no methods to tackle CNS complexity; as you will hear later there are now ways to approach this.
2. Because guidelines were general (flexible) they resulted in least common denominators.

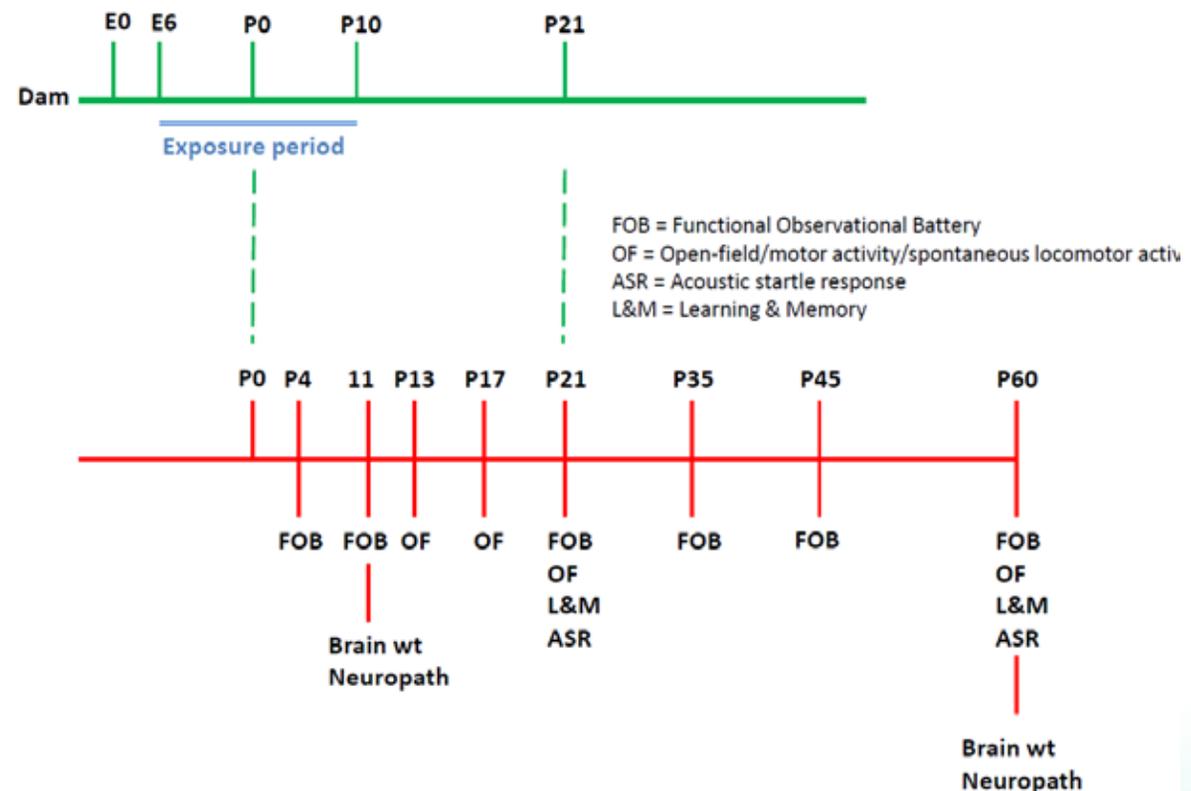
But it doesn't have to be this way!



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Problem #1

- The design



EPA OPPTS 870.630 DNT Guideline

Adapted from: Tsuji & Crofton (2012). *Cong. Anom.*, 52, 122-128.



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Time Points

- Why FOB at P4, 11, 21, 35, 45, 60? Who decided this? Based on what? There is no literature that supports these measures at all these ages.



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Time Points

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- Why OF at P13, 17, 21, 60? Rats don't walk well at P13. What neurotoxin has effects at P17 but not at P21 or vice versa?



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- Why ASR at P21 and 60? Not unreasonable in this case but why P21; ASR is highly variable at this age.
- **Why L&M on P21 and 60? Rats cannot learning complex tasks at P21 so little information about cognitive function is possible at this age.**



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Problem #2

- The tests: Why these?
 - FOB = functional observational battery
 - ASR = acoustic startle response
 - OF = open-field; locomotor/motor activity
 - L&M = learning and memory
 - Passive avoidance (PA)
 - T or M-water maze



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What is the FOB: 2 Examples

Idea: Quick, simple screen

FOB (also called the Irwin battery)

Parameters	
Posture	Biting
Convulsions/tremors	Palpebral (eyelid) closure
Feces consistency	
Ease of removal from cage	Ease of handling animal in hand
Lacrimation/chromodacryorrhea	Salivation
Piloerection	Fur appearance
Palpebral closure	Respiratory rate/character
Eye prominence	Mucous membrane/eye/skin color
Red/crusty deposits	Muscle tone
Mobility	Gait
Rearing	Arousal
Convulsions/tremors	Urination
Grooming	Defecation
Bizarre/stereotypic behavior	Gait score
Time to first step (s)	Backing
Approach response	Touch response
Startle response	Tail Pinch response
Pupil response	Eyeblink response
Forelimb response	Hindlimb response
Air-righting response	Olfactory response
Hindlimb extensor strength	Grip strength: hind and fore limb
Hindlimb foot splay	Rotorod performance
Body temperature	Body weight
Catalepsy	

Autonomic

Salivation
Lacrimation
Urination
Defecation
Respiration
Pupil reflex
Rectal temperature

Neuromuscular

Posture
Gait
Straub tail
Body tone
Ptosis
Exophthalmos
Grip strength
Traction
Twitches
Convulsions

Sensorimotor

Touch response
Palpebral reflex
Startle (clicker)
Pinna reflex
Righting reflex

Behavioral

Arousal
Motor activity
Vocalization
Aggression
Sniffing
Grooming
Scratching
Rearing
Stereotypy
Bizarre Behavior
Activity



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What's in the FOB: 2 Examples

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31 non-concordant items



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Quiz #1

- Based on what you just saw: What does the FOB measure?
- What central processes underlie the tests?

None, apparently



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What Kind of Data do the FOB Provide?

- Example



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Quiz #2

- What were the findings?

Hard to know

FOB problems:

1. Subjective; not quantitative
2. Data analysis: Usually none
3. Unrelated items; time-consuming
4. No underlying construct
5. Sensitivity (see below)
6. Reliability (?)
7. Validity (?)



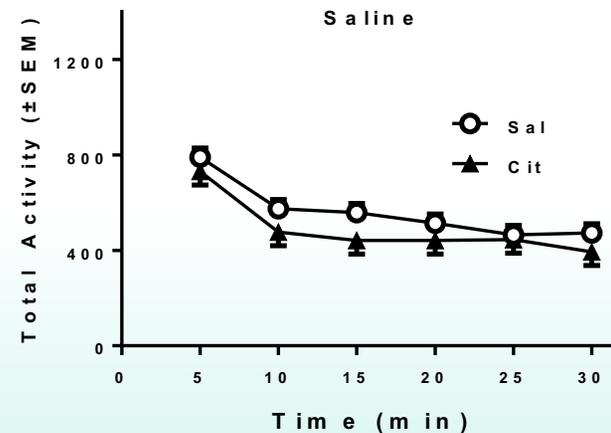
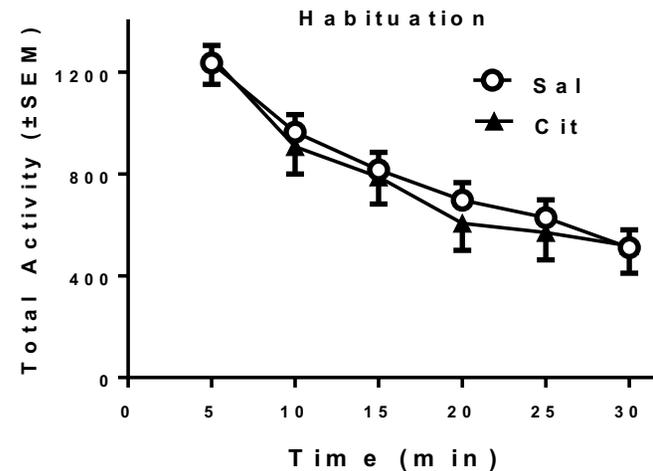
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Locomotor/Motor Activity, Open-Field



Sensitivity: high
Reliability: moderate
Validity: moderate

Type I errors: moderate
Apical (non-specific)





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Locomotor Activity: Interlaboratory Reliability

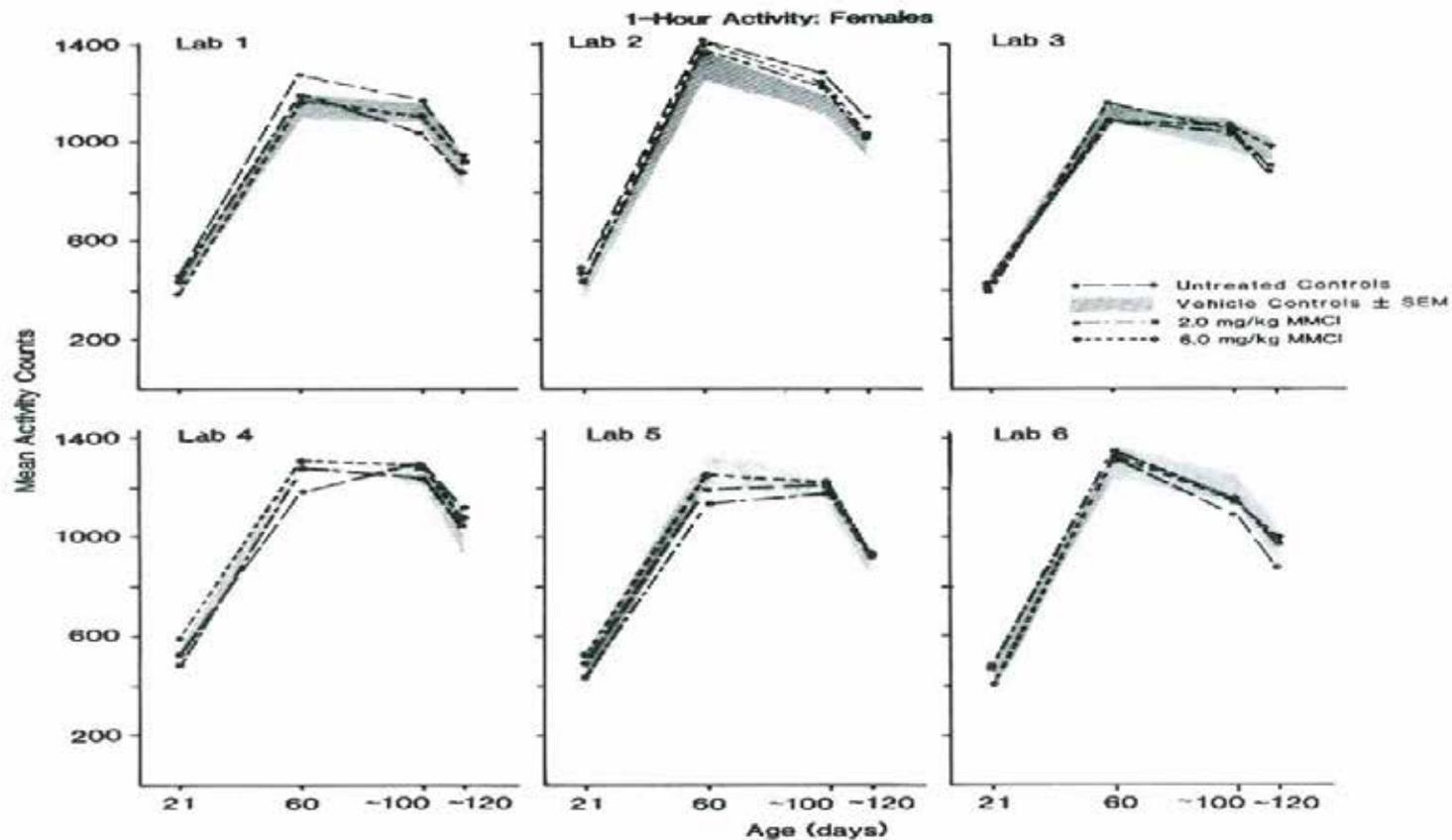


FIG. 22. Female 1-hr activity levels in the Figure-8 maze in the MMCI study at each laboratory.



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Startle Reflex

Startle apparatus

* Key words

- * PPI
- * acoustic startle response (ASR)
- * tactile startle response (TSR)



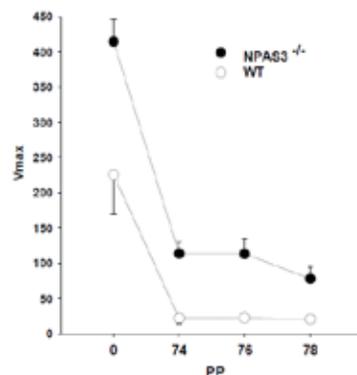
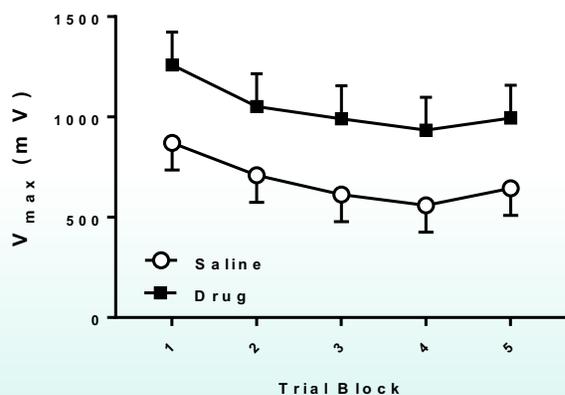
Acoustic Startle (ASR)

Validity

Construct : Yes, neural pathway known
 Predictive: Human to rodent homologous response
 Content/face: Yes, and quantitative
 Empirical: EPA point of departure in 19% of OPPS OP studies

Tests of reflex modification

- Acoustic startle
- Tactile startle
- Prepulse inhibition
- Startle facilitation



1. Trials: 50 to 100
2. Habituation: within sessions: yes
between sessions: minor
3. Retesting: Yes
4. Is trial-1 different? Yes
5. V_{max} , first V_{max} , V_{avg} , T_{max}



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ASR Interlaboratory Reliability

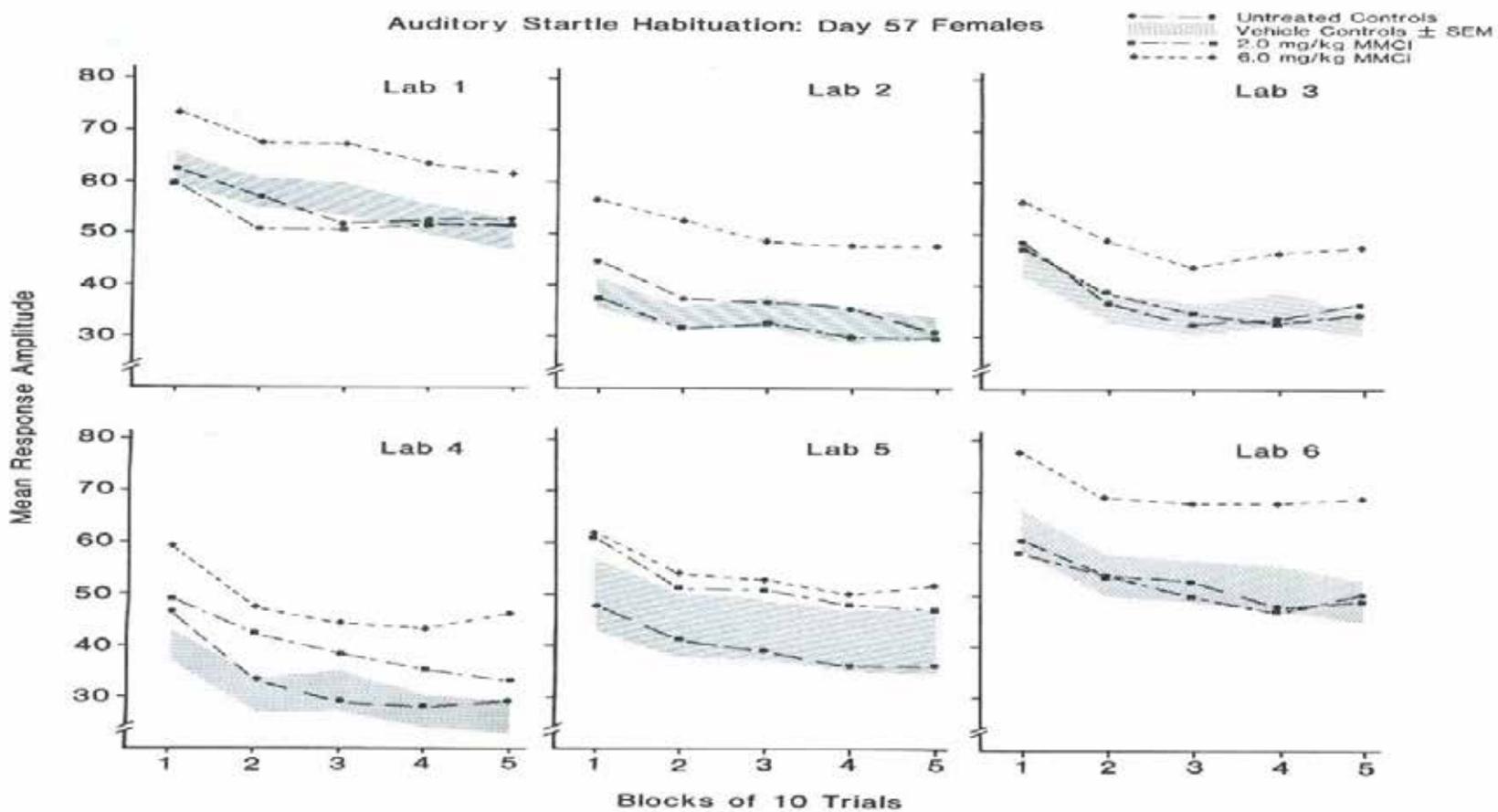
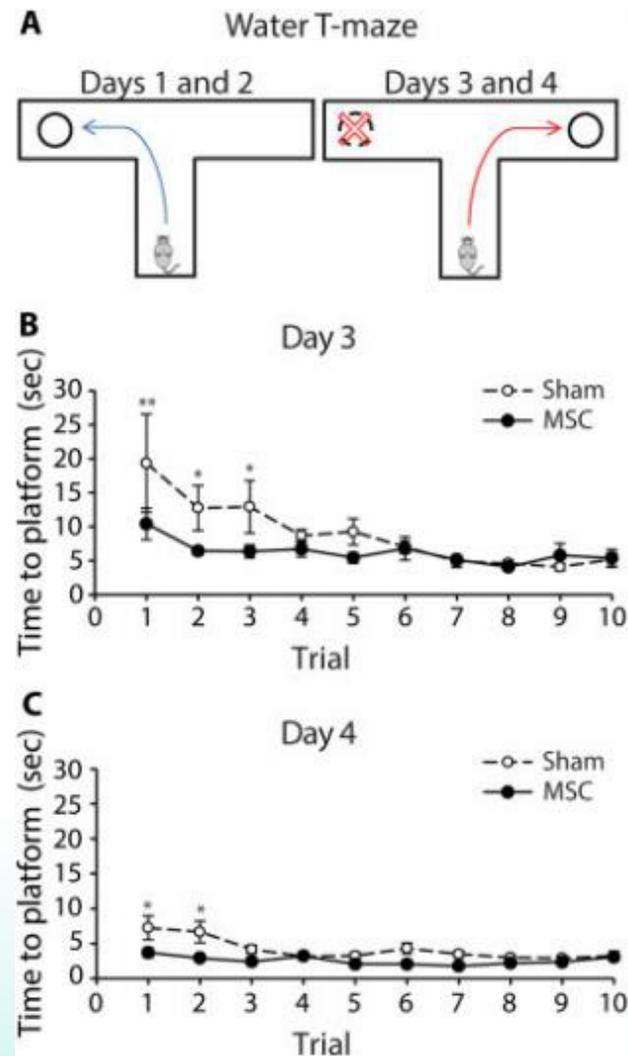
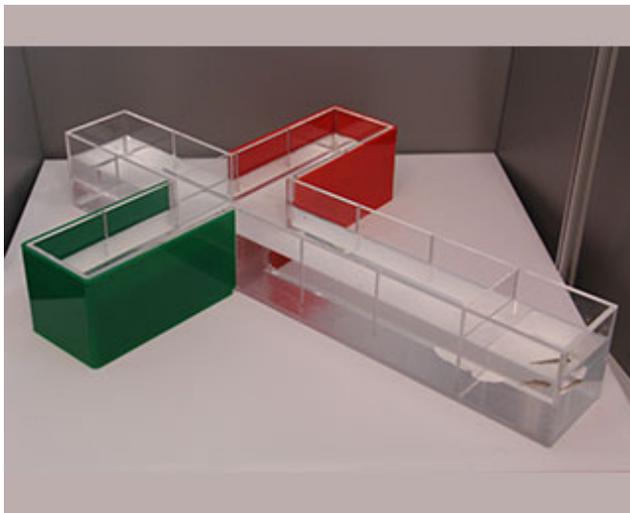


FIG. 13. PND 57 female auditory startle response amplitude at each laboratory in the MMCI study.



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Water T-Maze



Segal-Gavish et al. (2015). *Autism Res.*, 9(1)

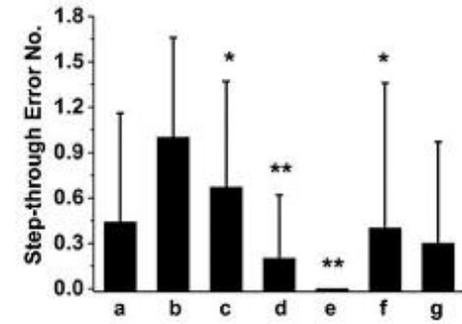
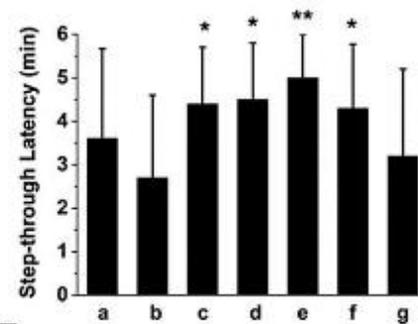


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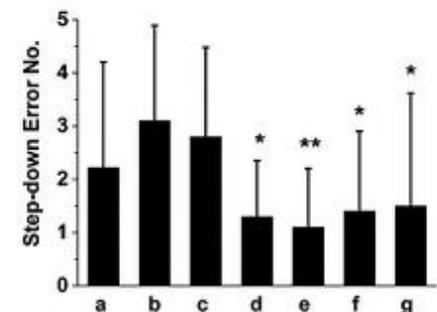
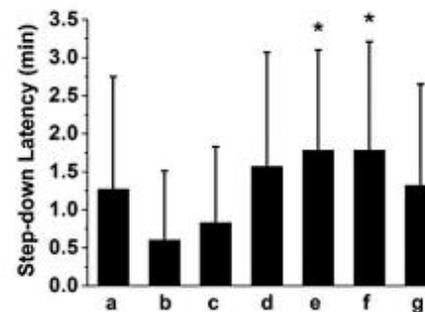
Passive Avoidance



A



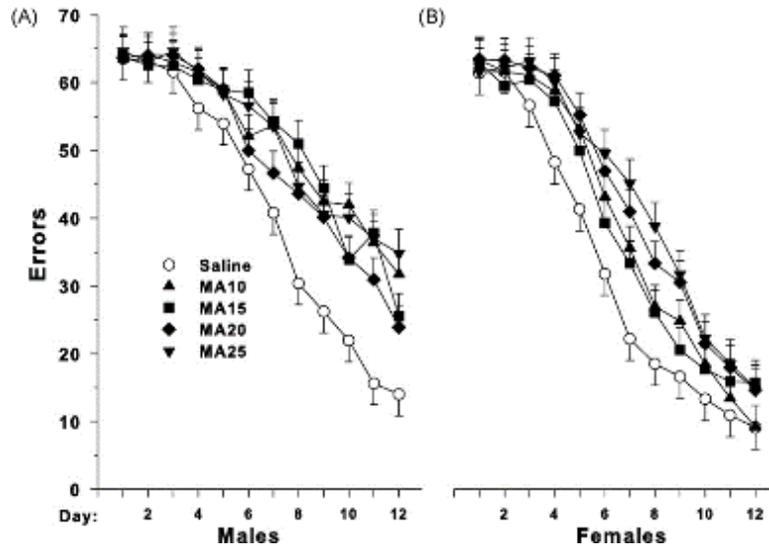
B



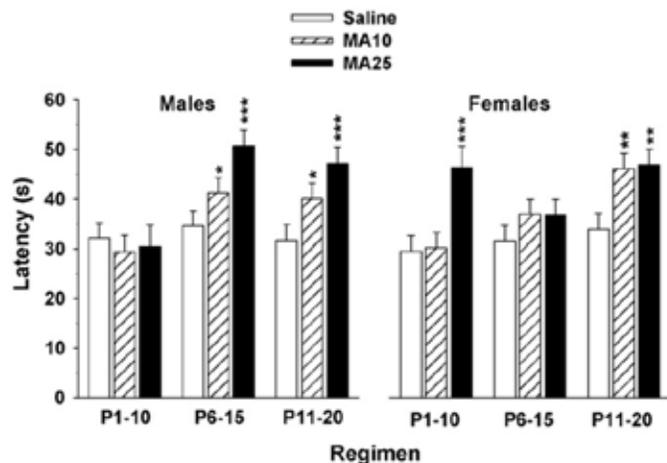
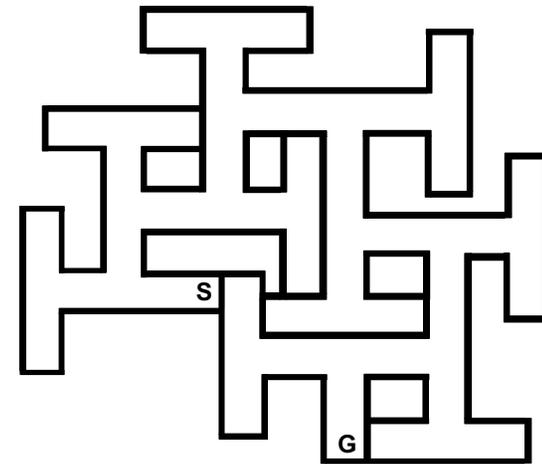


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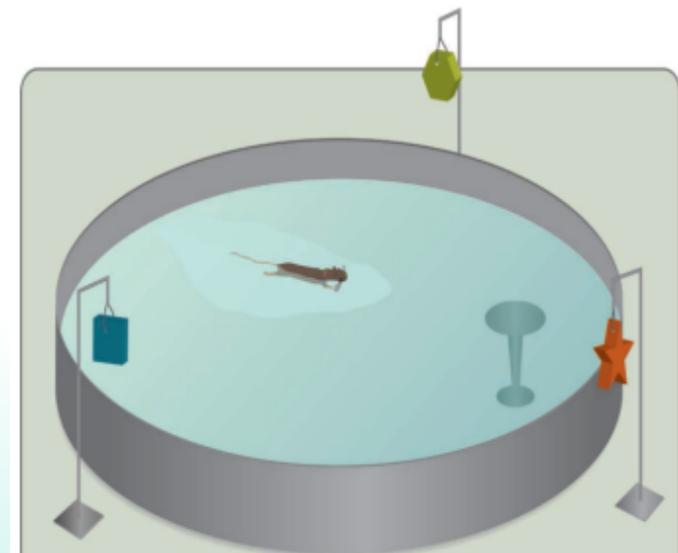
Developmental Effects of Methamphetamine



CWM



MWM





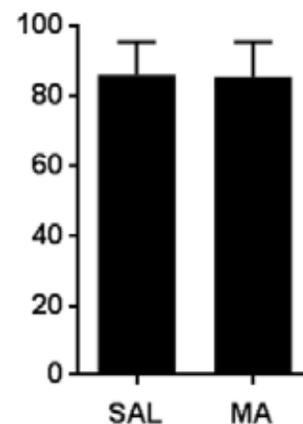
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Developmental Meth and PA

Evidence that PA is insensitive

developmental methamphetamine

- ✓ Effects:
 - ✓ CWM
 - ✓ MWM
 - ✓ RWM
 - x PA **No**





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How do these Tests Perform in EPA DNT Guideline Studies on 69 Neurotoxins?

Here's the EPA's own evaluation of DNT tests:

From: Raffaele et al. (2010). The use of developmental neurotoxicity data in pesticide assessments. *Neurotoxicol. Teratol.*, 32, 503-572.

Table 2	
Data set of guideline ^a DNT studies on pesticide active ingredients	
Data category	Number of studies
Submitted to OPP ^b	78
Final reviews available	72
Included in analysis	69
Regulatory impact as of 12/2008 ^c	15
Potential regulatory impact ^d	13
*OPPTS 870.6300	
^b As of December 2008	
^c The DNT hazard value was selected as the point of departure for at least one exposure scenario in the final risk assessment.	
^d The DNT study may have a future regulatory impact, but the current regulatory decisions were finalized prior to the receipt of the DNT study for these pesticides (see text).	

i.e., known neurotoxins

Number of studies where DNT provided **Point of Departure** for risk assessment:

20/69 (29%) motor activity

13/69 (19%) ASR

3/69 (4%) FOB



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If FOB and L&M Tests were Insensitive should They be Dropped?

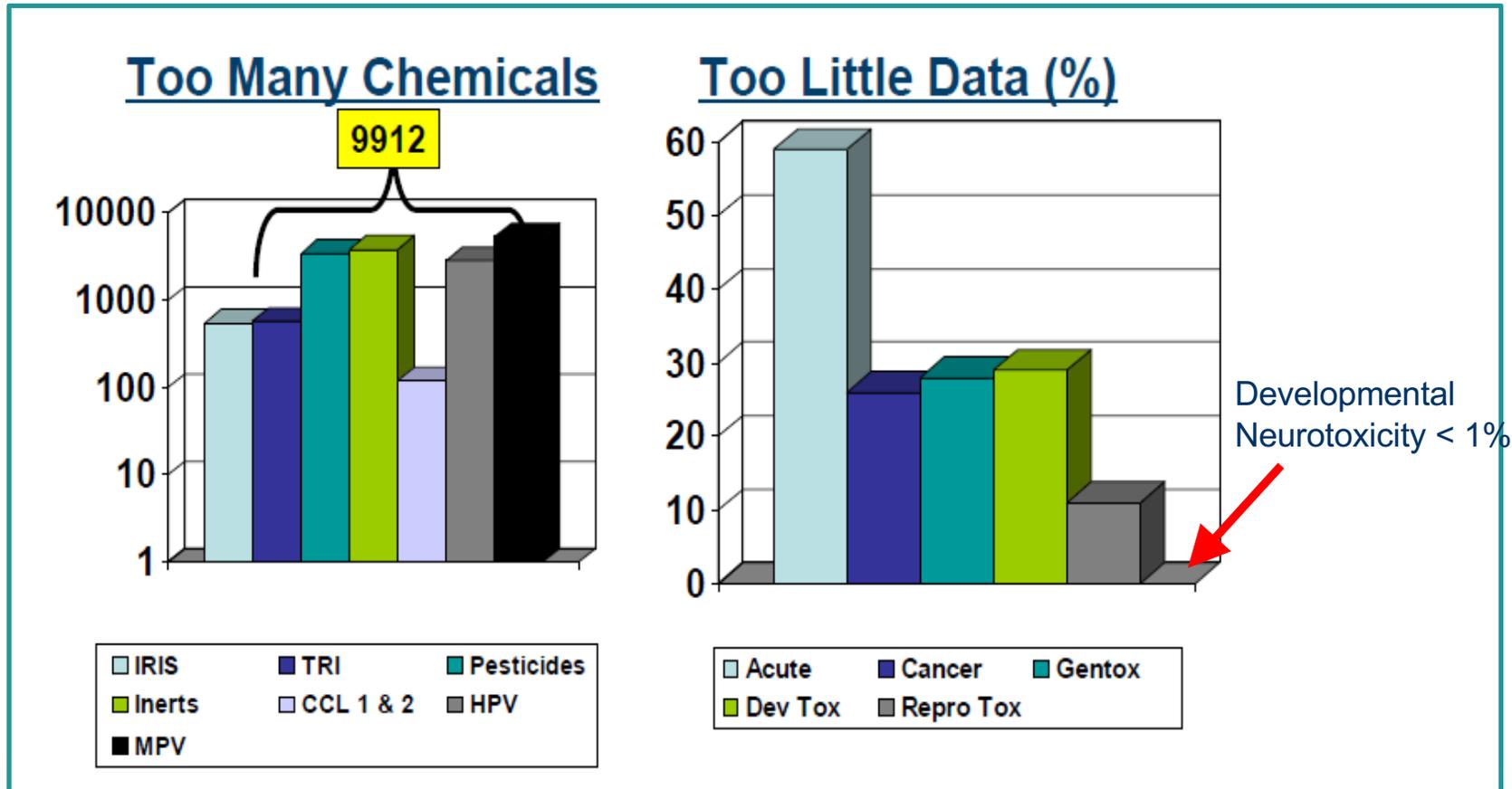
- Not necessarily
- The problems are different
- FOB: Not one test; differs by lab. Needs revision
- L&M: problem is the tests; choose better tests

Why does the DNT evoke concern?



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Scale of the Problem for Chemicals in Commerce



Scale of problem for pesticides: ~100

Slide courtesy of Tim Shafer, Ph.D., EPA



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Scale of the Problem for FDA:

Food additives: ~2000 direct, "secondary" direct, color additives, GRAS and prior-sanctioned substances: **manageable**.

Drugs: ~1500; ~30/yr; **quite manageable** for DNT and necessary.

Residues: 1000's; **problematic**

Hence, the problem of assessing DNT across agencies and programs varies widely



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Where does DNT Fit?

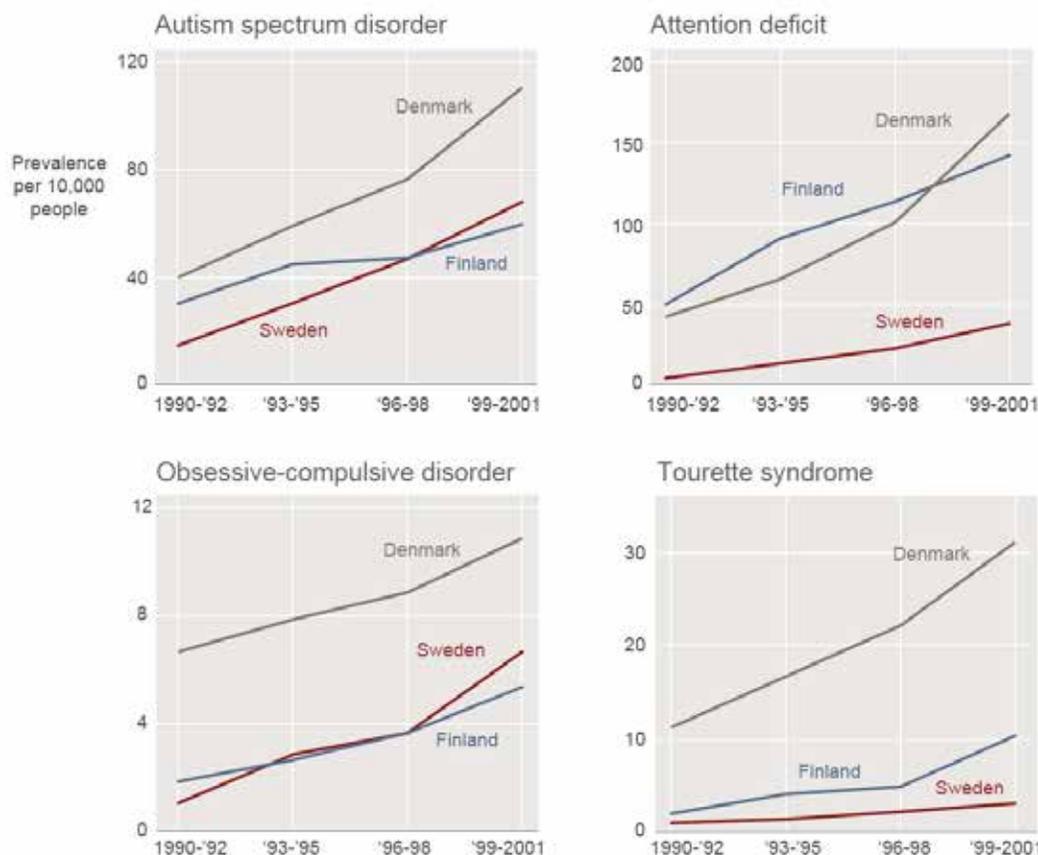
- FDA
 - All drugs: yes
 - Food additives: yes if prioritized
 - Residues in food: Selectively only
- EPA
 - All pesticides: yes
 - Chemicals in commerce: no
 - Need high-through-put screens, AOPs; then high priority subset for DNT confirmation



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Need for DNT Studies

Prevalence of mental disorders at age 10 in four birth cohorts



ASD = 1/68
(CDC);
having risen
steadily over
20 years



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Is Current DNT the Best We Can Do? **No**

- FOB: Inconsistent content, subjective, insensitive
- Activity: pretty good
- ASR habituation: pretty good; **could improved by adding PPI** (would add 20 min to protocol).
- L&M: Needs major improvement; discontinue T-mazes and PA; switch to better tests (see below).



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Learning: What Makes a Good Test?

- Not too easy (steep learning curve)
- Not too hard (flat learning curve)
- Not too aversive
- Easy to motivate
- Able to equalize motivation
- Control for performance factors
- Relevant types of L&M



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What Kind of L&M should be Assessed? What's Important for People?

Learning

Classical Conditioning (Pavlov)

Unconditioned Stimulus (food) → Unconditioned Response (salivation)

Unconditioned Stimulus (food) → Unconditioned Response (salivation)

Conditioned Stimulus (bell) / Unconditioned Stimulus (food) → Unconditioned Response (salivation)

Conditioned Stimulus (bell) → Conditioned Response (salivation)

In classical conditioning, a neutral stimulus becomes associated with a reflex. The bell, a neutral stimulus, becomes associated with the reflex of salivation.

Operant (Instrumental) Conditioning (Skinner)

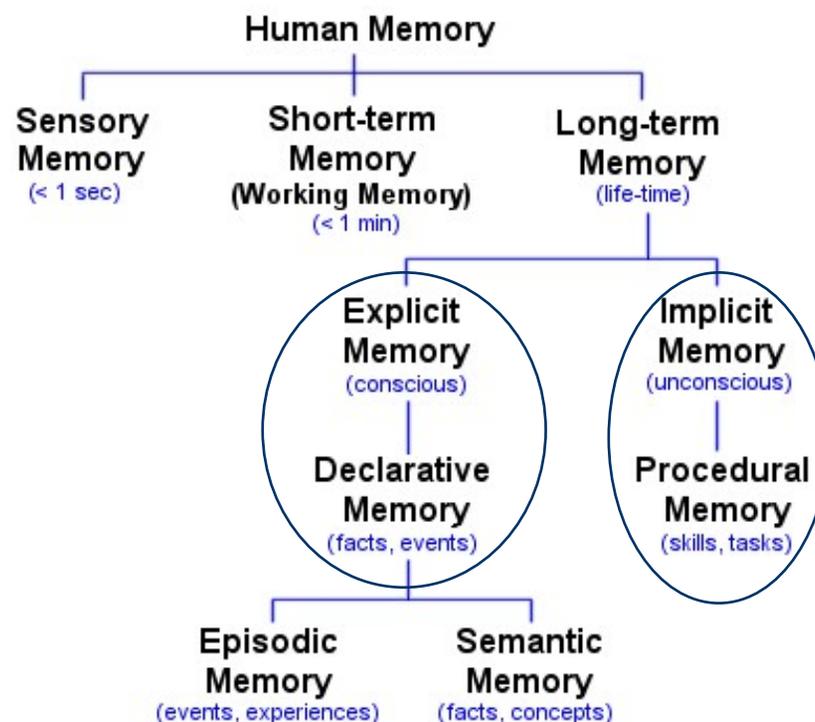
Response (press lever) → Stimulus (reward) (food)

TIME

Conditioned Response (press lever) → Conditioned Stimulus (Reward)(food)

In operant conditioning, the learner "operates" on the environment and receives a reward for certain behavior (operations). Eventually the bond between the operation (pressing the lever) and the reward stimulus (food) is established.

Memory





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What are the Equivalent Forms of Memory in Rodents?

- Explicit/Declarative/Allocentric memory (people, places, things, and events) = orientation to surroundings: distal cues. Brain region = hippocampus; entorhinal cortex
- Implicit/Egocentric memory: (skills, paths, event order) = self-orientation: proximal and internal cues
Brain region: striatum; presubiculum; other



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How are These Assessed in Rodents?

- Allocentric: Morris water maze (MWM); radial-ram maze (RAM); radial water maze (RWM); Barnes maze.
- Egocentric: Cincinnati water maze (CWM); Cued MWM, foraging maze, Wishaw method



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Why Water Mazes?

Advantages of water mazes

- No training (for MWM)
- Minimal training (labyrinthine mazes)
- Immune to appetite differences
- Immune to body weight differences
- Intrinsic motivation
- 100% of animals finish
- Nearly 100% master these tasks



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MWM

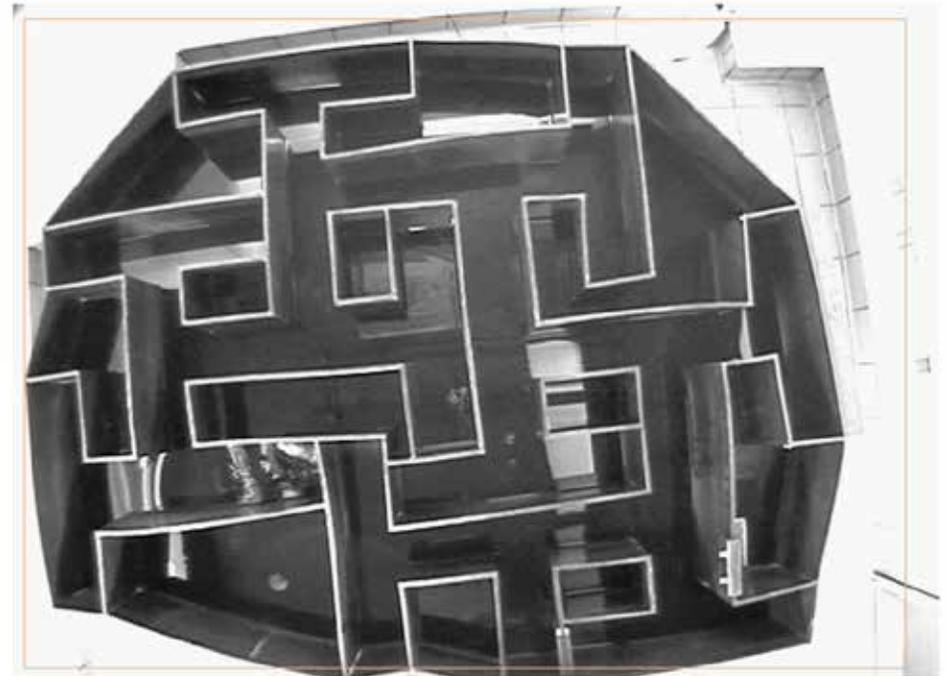
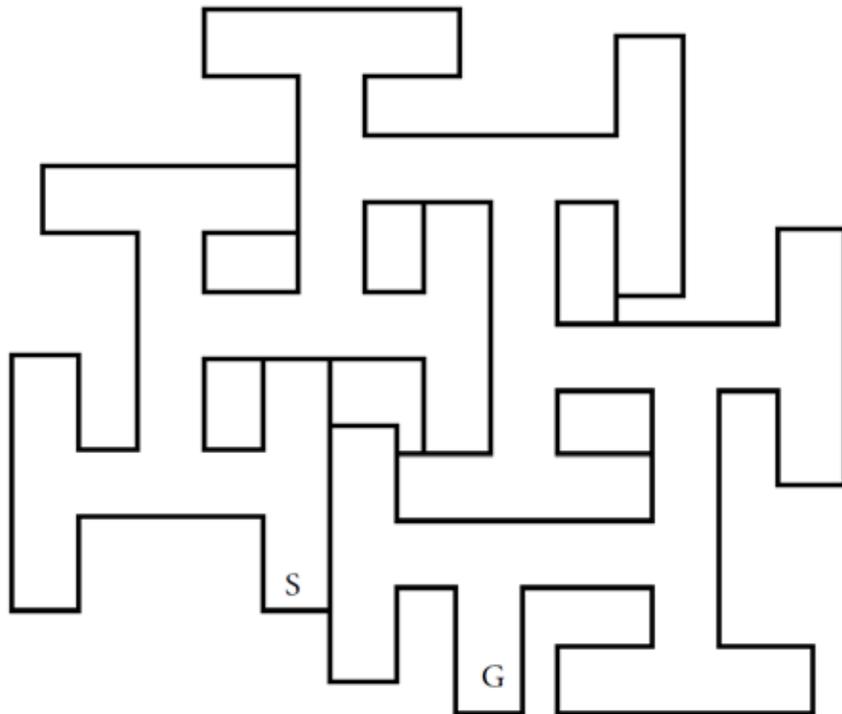


Morris water maze (MWM)



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CWM



Vorhees & Williams (2016).
Neurotoxicol. Teratol., ePub
head of print.



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Perspective

- **DNT:**
- Needs 2 types of improvement
 - Revised tests
 - Revised ages
- Fit to agency needs
- Not for mechanisms
- Only for outcomes

But can provide hints of mechanisms if the right tests are chosen

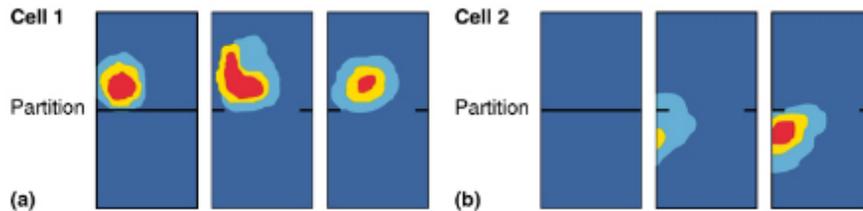


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Top Down Mechanistic Inference

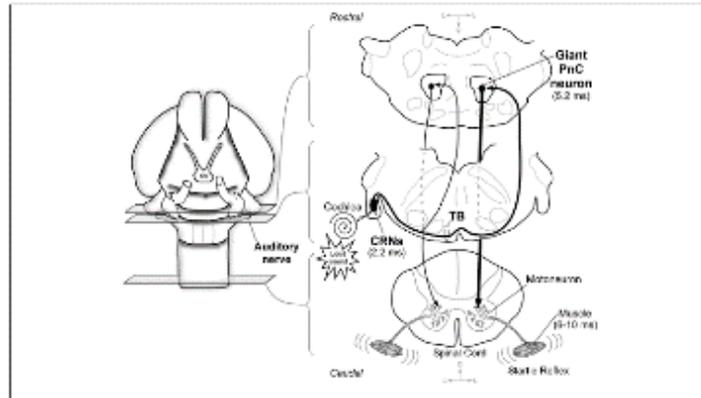
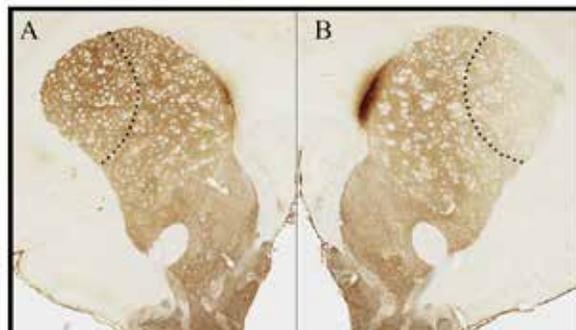
- ASR

- MWM



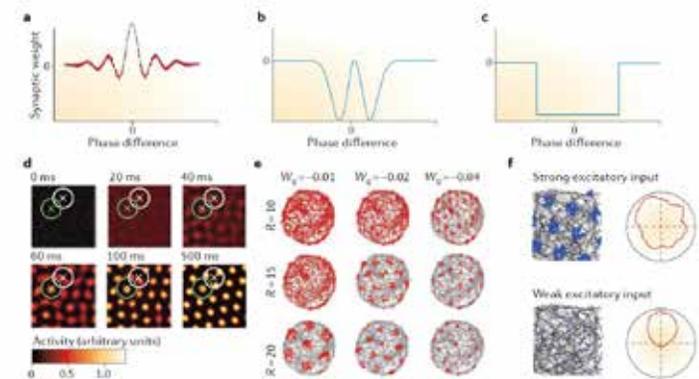
Neuroscience: Exploring the Brain, 3rd Ed. Bear, Connors, and Paradiso Copyright © 2007 Lippincott Williams & Wilkins

- CWM



From Gomez-Nieto et al. (2014). *Front. Neurosci.*, **8**: 216. Illustration of ASR trisynaptic pathway.

CRN = cochlear root neuros; PnC = giant neurons of the caudal pontine reticular nucleus (also called the n. reticularis pontis caudalis)



Grid cells and cortical representation
 Edouard I. Moser, Yasser Roudi, Memmo P. Witter, Clifford Kentros, Tobias Bonhoeffer and May-Britt Moser. *Nature Reviews Neuroscience*, 2014, **15**, 466-481.

Braun et al. (2015). *Neurobiol. Learn. Mem.*, **118**, 55-63.



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Future Directions for DNTs

- Not appropriate in all contexts
- Often necessary; rarely sufficient
- Non-mechanistic but often the only option
- NTP: new DNT (includes PPI, MWM, etc.)
- Should be in other study designs too: Extended one-generation reproductive (EOGRT) guideline (**not** cut L&M out).



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Keep Goal in Sight

- Brain development is complex; many things can go wrong
- Effects in humans are often about higher functions: forgetting, poor recall, impaired learning, impaired problem-solving, attention problems: all cognitive; but the DNT is weak on cognitive assessment.
- FOB does not address these
- PPI is one aspect of attention
- MWM/CWM assess learning and 2 forms of memory
- 69 DNT studies of neurotoxins tell us something important. Are we listening? Or are we going to do 69 more the same way before we take action?

I hope not!

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Thank You