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An evaluation of the fixed concentration procedure for assessment of acute inhalation toxicity

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1 **An evaluation of the Fixed Concentration Procedure for assessment of acute**
2 **inhalation toxicity**

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16

17

Abstract

Acute inhalation studies are conducted in animals as part of chemical hazard identification and for classification and labelling. Current methods employ death as an endpoint (OECD TG403 and TG436) while the recently approved fixed concentration procedure (FCP¹) (OECD TG433) uses fewer animals and replaces lethality as an endpoint with evident toxicity. Evident toxicity is the presence of clinical signs that predict that exposure to the next highest concentration will cause severe toxicity or death in most animals. Approval of TG433 was the result of an international initiative, led by the National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs), which collected data from six laboratories on clinical signs recorded for inhalation studies on 172 substances. This paper summarises previously published data and describes the additional analyses of the dataset that were essential for approval of the TG.

Highlights:

- The FCP for acute inhalation toxicity has been accepted by OECD as TG433.
- TG433 uses evident toxicity while other approved methods use lethality.
- A sighting study with 1 M and 1 F animal reliably identifies the more sensitive sex.
- The three methods (LC₅₀, ATC, FCP) showed good agreement in a retrospective analysis.

Keywords:

¹ Abbreviations: FCP, fixed concentration procedure; LC₅₀, concentration causing death in 50% of animals tested; GHS, global harmonised system; ATC, acute toxic class; NC3Rs, National Centre for the 3Rs; PPV, positive predictive value; CI, confidence limits; MTD, maximum tolerated dose; TC₅₀, concentration causing toxicity in 50% of animals tested

- 38 Acute inhalation studies; 3Rs; Evident toxicity; Fixed concentration procedure (FCP);
39 Refinement; Regulatory toxicology; TG403; TG436; TG433.

ACCEPTED MANUSCRIPT

40 1. Introduction

41 Acute inhalation studies are conducted in animals as part of chemical hazard identification
42 and for classification and labelling purposes. There has been considerable work towards
43 refining the existing methods so that 'evident toxicity' rather than death can be used as an
44 endpoint, through the use of the fixed concentration procedure (FCP) (OECD, 2004). This
45 has recently been accepted as OECD test guideline (TG) 433 as an alternative to the
46 currently accepted LC_{50} ² and the Acute Toxic Class (ATC) methods (OECD TGs 403 and
47 436 respectively) (OECD, 2009a; OECD, 2009b). The FCP also has the potential to use
48 fewer animals, due to the use of a single sex, and fewer studies overall, as it will obviate the
49 need to test at the next concentration up in some cases. The principles of the three methods
50 are summarised in Table 1 and are described in more detail in Sewell *et al.* (2015). In brief,
51 the LC_{50} method involves testing at three or more concentrations to enable construction of a
52 concentration-mortality curve and a point estimation of the LC_{50} which allows classification
53 into one of five toxic classes using the globally harmonised system (GHS) of classification
54 and labelling of chemicals (OECD, 2001) (Table 2). The ATC method is a refinement of the
55 LC_{50} . Rather than a point estimate of the LC_{50} , this method estimates which toxic class the
56 LC_{50} falls within, so that classification can be assigned. It uses an 'up-and-down' procedure
57 to test up to four fixed concentrations from the boundaries of the categories (or toxic classes)
58 in the GHS classification system. Depending on the number of deaths at each concentration
59 further testing may be required, or a classification can be made. The FCP uses a similar up-
60 and-down approach to the ATC, but instead identifies an exposure concentration that causes
61 evident toxicity rather than death, so that the LC_{50} can be inferred (based on the prediction of
62 death at the next fixed higher concentration). Classification can then be assigned according
63 to the GHS criteria using the predicted LC_{50} . Figures 1, 2 and 3 summarise the possible
64 study outcomes and the resulting classifications for the LC_{50} , ATC and FCP methods

² the concentration that is expected to result in the death of 50% of the animals

65 respectively, using a starting concentration of 5mg/L for dusts and mists as an example
66 (Price et al., 2010).

67 The FCP was removed from the OECD work plan in 2007 because of three main concerns:
68 the ill-defined and subjective nature of evident toxicity; the lack of evidence for comparable
69 performance to the LC₅₀ and ATC methods; and suspected sex differences (the FCP
70 originally proposed the default use of females). Concerns about the definition of 'evident
71 toxicity' were raised despite its long use in the Acute Oral Fixed Dose Procedure (OECD
72 TG420) without guidance on what constitutes evident toxicity, nor in the dermal toxicity
73 equivalent of this TG (OECD TG434) which was approved in 2017 without similar guidance.
74 However, all the concerns about the FCP have been resolved through the work of a global
75 initiative led by the UK National Centre for the Replacement, Refinement and Reduction of
76 Animals in Research (NC3Rs) resulting in its acceptance in April 2017.

77 Some of the work that led to this decision has already been published (Sewell *et al.*, 2015).
78 This previous paper described analyses of a large data set of acute inhalation studies using
79 the LC₅₀ or ATC methods in which signs predictive of death at the next highest concentration
80 (i.e. evident toxicity) were identified. Further analyses were needed to address fully the
81 points noted above and to satisfy concerns raised by the OECD national coordinators during
82 the consultation process, and were therefore vital for the final acceptance of the FCP
83 method by OECD. These included further support for the robustness of the signs previously
84 identified, new statistical calculations to support the value of the sighting study in choosing
85 the most sensitive sex, and retrospective classifications to compare outcomes obtained
86 using the three methods. This paper summarises the previously published data and presents
87 the new analyses that formed the basis for acceptance of the new test guideline.

88

89 **2. The robustness of evident toxicity as an endpoint**

90 **2.1 Definitions**

91 Evident toxicity is an accepted endpoint in the fixed dose procedure for acute oral toxicity
92 studies (OECD TG420) (OECD, 2002a). Here evident toxicity is defined as “*a general term*
93 *describing clear signs of toxicity following the administration of test substance, such that at*
94 *the next highest fixed dose either severe pain and enduring signs of severe distress,*
95 *moribund status or probable mortality in most animals can be expected.*” However, for this
96 accepted test guideline, no further guidance has been provided on what constitutes ‘evident
97 toxicity’, and it is not clear how often this test guideline is being used in practice.

98 Although evident toxicity was already accepted as an endpoint for this existing test guideline,
99 criticism of this endpoint was a major factor for the withdrawal of the FCP from the OECD
100 work plan in 2007, due to concerns around subjectivity. With the aim of making evident
101 toxicity more objective and transferable between laboratories, the NC3Rs working group
102 collected data on the clinical signs observed in individual animals during acute inhalation
103 studies on 172 substances (Sewell *et al.*, 2015). Because data was collected from a number
104 of laboratories, there was some variation in terminology, requiring retrospective
105 harmonisation by the working group leading to an agreed lexicon of signs (Sewell *et al.*,
106 2015). These data were analysed to identify signs that could predict lethality would occur if
107 the animals were exposed to the next highest concentration, lethality here being defined as
108 the death, or severe toxicity requiring euthanasia, in two or more animals in a group of five.

109
110 There are three important quantities derived from the analysis. The positive predictive value
111 (PPV) is defined as the percentage of times that the presence of a sign correctly predicts
112 lethality at the next highest concentration. A value less than 100% indicates some false
113 positives that would result in over-classification of the substance, undesirable from a
114 business perspective, but erring on the side of caution for human safety. Sensitivity is
115 defined as the proportion of lethality predicted by the presence of the sign at the lower
116 concentration. There is no expectation that a single sign would predict 100% of toxicity at
117 the next higher concentration, but signs with very low levels of sensitivity are less useful

118 because of their rarity and their small contribution to overall evident toxicity. Less than 100%
119 sensitivity indicates some false negatives, that is, lethality occurs at the higher concentration
120 even though the sign was absent at the lower concentration. This does not result in incorrect
121 classification as testing would be carried out at the higher concentration anyway. Specificity
122 is the measure of the percentage of non-lethality at the higher concentration associated with
123 the absence of the sign at the lower concentration. The individual signs focussed upon were
124 those with high PPV and specificity, with appreciable sensitivity.

125

126 In the absence of any deaths at the lower concentration, toxicity occurred at the higher
127 concentration in 77% of the studies (95% CI 72-82%), hence this value was used to set a
128 threshold for use of a sign as an indicator of toxicity. Consequently, those signs with PPV's
129 not only in excess of this value, but whose lower value of the 95% confidence limits of the
130 PPV also exceeded 77% were selected.

131

132 **2.2 Death as a predictor of toxicity at the next highest concentration**

133 In the Sewell *et al.* (2015) dataset, death or euthanasia was found in the majority of studies
134 at one or more concentrations. The PPV of a single death at the lower concentration was
135 93% (95% CI 84-98%) i.e. a single death is a strong predictor of lethality at the higher
136 concentration. Although evident toxicity is the intended endpoint for the FCP method, and
137 severe toxicity and death are to be avoided where possible, if death does occur this endpoint
138 can therefore also be used to make decisions concerning classifications (Figure 1). But
139 interestingly, since death is used as an objective endpoint for LC₅₀ and ATC methods, it
140 should also be noted that when two deaths occurred at the lower concentration this too was
141 only 97% (95% CI 91-99%) predictive of lethality at the next higher concentration. That is to
142 say, for a small number of the studies conducted, fewer deaths occurred at the higher
143 concentration than at the lower. For the ATC method in particular, this could lead to an
144 inaccurate classification.

145

146 **2.3 Signs observed on day 0**

147

148 Signs seen on the day of the test cannot unambiguously be ascribed to the chemical and
149 may have resulted from handling, restraint or the inhalation procedure. Some signs such as
150 wet coat and writhing were only observed on day 0, but some of the common and severe
151 signs were seen both on day 0 and on subsequent days. For two such signs, irregular
152 respiration and hypoactivity, the effect of discounting the day 0 observations increased the
153 PPV and specificity (Sewell *et al.*, 2015) showing that signs that persist for more than 24h
154 after exposure are better predictors of toxicity. However, as pointed out in this paper and in
155 the new TG, severe signs seen on day 0 should be a signal to halt the study or possibly
156 euthanize the animals so affected.

157

158 **2.4 Signs of evident toxicity**

159

160 In the case of one death at the lower concentration, a number of signs observed in the
161 surviving animals increased the PPV of the single death (Sewell *et al.*, 2015). Some of these
162 also had high sensitivity. Most importantly, a subset of these were also seen to be highly
163 predictive in the absence of death at the lower level. The four signs in this subset were:
164 hypoactivity, tremors, bodyweight loss (>10%), and irregular respiration (Table 3). The data
165 showed that if any of these signs were observed in at least one animal from the day after
166 exposure, animals were highly likely to die if exposed to the next higher concentration.
167 Where any animals experienced tremors or hypoactivity this was 100% predictive of lethality
168 at the next higher concentration. If any animal experienced body weight loss in excess of
169 10% of their pre-dosing weight, this was predictive of death at the higher concentration in
170 94% of cases. Similarly, body weight loss has previously been shown to be a reliable and
171 frequent objective marker for the determination of the maximum tolerated dose (MTD) in

172 short term toxicity tests in animals (Chapman *et al.*, 2013). Irregular respiration was also
173 highly predictive, being indicative of lethality in 89% of cases.

174

175 These four signs were chosen to represent evident toxicity since they had lower 95%
176 confidence interval limits in excess of the 77% threshold detailed above. However, there
177 were other signs that were also highly predictive of lethality at the next higher concentration,
178 albeit with wider confidence intervals often due to their infrequent occurrence in the dataset.
179 For example, oral discharge occurred rarely (sensitivity 2.4%), but was 100% (95%
180 confidence interval (CI) 54.9 -100%) predictive of lethality at the next highest concentration.
181 Therefore the signs used to guide the decision of evident toxicity should not necessarily be
182 restricted to the four signs named in Table 3. Information on the pred
183 ictivity and sensitivity of each of the clinical signs observed in the dataset has been made
184 available in Supplementary Data File 1. Information on subclasses of the dataset for dusts
185 and mists, males and females is also available. This is intended to complement and add to
186 study director judgement and experience so that a decision can be made on the recognition
187 of evident toxicity in the absence of death or the four named signs.

188

189 The definition of 'evident toxicity' used for the purpose of the analysis was conservative
190 when considering the accepted definition of evident toxicity in TG420, since it was based
191 simply on the prediction of actual mortality or euthanasia at the higher concentration (in the
192 absence of death at the lower), and did not also include 'severe distress or moribund status'
193 at the higher concentration. However, this definition was chosen to reflect the different
194 outcomes used for decision making in the protocol, so that 'evident toxicity' could be used to
195 predict 'outcome A' (the death of 2 animals at the higher concentration), and therefore avoid
196 the need for testing at that level (Figure 1). By using evident toxicity, classification can be
197 made based on the *prediction* of death at the higher concentration. The method therefore
198 has the potential to minimise the number of studies (i.e. concentrations tested) that will be

199 required to make a classification and reduce the overall degree of suffering of animals in the
200 study.

201

202 **2.5 Severity and duration of signs**

203 Severity of signs was not recorded consistently in the dataset, only whether a sign was
204 present or not, and as the data had been generated in a number of different laboratories, the
205 grading of severity may have had a strong subjective element. Therefore in the previous
206 publication, only the severity of bodyweight loss was examined in more detail as it had been
207 recorded as either unspecified, mild (reduced weight gain), moderate (10-20% compared
208 with day 0) or substantial (>20% compared with day 0). In fact, PPV was largely unaffected
209 by dividing body weight loss into these subcategories, but sensitivity declined because of the
210 smaller numbers in each category.

211 Another way of looking at severity was to examine whether the sign was present in more
212 than one animal. In the previous paper (Sewell *et al.*, 2015), it was shown that for irregular
213 respiration (the sign for which there are the largest number of observations), the impact on
214 PPV and specificity of increasing numbers of animals showing the sign was very small.
215 However, because seeing the sign in a majority of animals was less common, the sensitivity
216 declined accordingly.

217 **2.6 Combinations and co-occurrence of signs (including signs in isolation)**

218 Sewell *et al.*, (2015) considered whether combinations of signs would increase sensitivity,
219 and thereby improve prediction of lethality at the higher concentration. However, the gains
220 in sensitivity of all pairwise combinations were small because of the strong co-occurrence of
221 signs, and inclusion of third or fourth signs had progressively less impact.

222 At the other extreme, we examined whether misclassification was likely if a sign was the only
223 one reported (i.e. seen in isolation), and occurred only once and in only one animal. Irregular

224 respiration and body staining were the most commonly observed signs in isolation (42% and
225 28% respectively of those animals that showed the sign) (Table 4). However, of the 268
226 pairs of studies³ analysed, there were only 5 in which irregular respiration was recorded in
227 the absence of other signs, and only once in only one animal. In each case, at least two
228 animals died at the next higher concentration showing that the single sign was predictive
229 (Table 5). Admittedly this is a small data set, but the finding supports the general robustness
230 of the sign which is typically seen in more than one animal, and rarely occurs in isolation.

231 **2.7 Varying concentration ratios**

232 An odd feature of the GHS classification system is that the ratios of LC₅₀ concentrations
233 defined for each grade 1-5 are not of equal size but vary from 2 to 10. For example, for
234 dusts and mists the concentrations tested are 0.05, 0.5, 1.0 and 5.0 mg/l (Table 2). Sewell *et*
235 *al.* (2015) considered how this would affect classifications by the FCP method. It seemed
236 possible that lethality at the higher concentration would be more likely if the concentration
237 ratio was larger and that conversely, a smaller change in concentration might lead to a
238 greater number of false positives i.e. lethality not seen at the higher concentration despite
239 evident toxicity at the lower. This has now been looked at in two ways. Sewell *et al.* (2015)
240 found that, for a small number of signs, the average concentration ratio for false positives
241 was smaller than for true positives, in agreement with this idea. However, of the four signs
242 selected as markers of evident toxicity, two were never associated with false positives (PPVs
243 of 100%) and in the other two cases, the effect of concentration ratio did not reach statistical
244 significance.

245 A further analysis was undertaken to look at the effect of the ratio of the higher to lower
246 concentration on the PPV. In Table 6, PPVs are shown for a number of signs with >2 to <5,
247 >5 to <10 or >10-fold ratios between the lower and higher concentrations. As anticipated,
248 PPVs are higher for the larger concentration ratios, but since the majority of the studies used

³ A pair of studies indicates a set of data from five animals, either all male or all female, exposed at two concentrations differing by at least a factor of two and in which no deaths occurred at the lower concentration.

249 the >2 to <5 fold ratio, the lower numbers in the remaining studies resulted in wider 95%
250 confidence limits of the PPV values. The conclusion is that the main signs of evident toxicity
251 were equally predictive regardless of the ratio of the higher to lower concentration.

252 3. Default sex and sighting studies

253 For the LC₅₀ procedure, since males and females are treated identically and classifications
254 are based on the sex that is most sensitive, sex differences generally do not have any
255 impact on classification. For the ATC procedure, since males and females are not treated
256 separately and the endpoints are based on the total number of deaths, irrespective of sex,
257 differences in sensitivity have more of an impact and make the test less stringent. For
258 example, where there is a 10-fold difference in sex sensitivity, simulations (Price *et al.*, 2011)
259 showed that substances where the LC₅₀ value of the most sensitive sex falls within GHS
260 class 3 (the narrowest GHS classification band), these are almost always incorrectly
261 classified as GHS class 4 (i.e. as less toxic). However, the guideline suggests that testing
262 should be conducted in the more sensitive sex alone if a sex difference is indicated, which
263 may mitigate this if sex differences are correctly identified in practice.

264 The original FCP method proposed the use of females as the default, as these were thought
265 to be the more sensitive sex, and males only used if they were known to be more sensitive.
266 In practice, significant differences in sensitivities between the sexes are fairly uncommon.
267 Price *et al.*, (2011) showed a significant statistical difference between the LC₅₀ values of
268 males and females for 16 out of 56 substances examined (29%), females being the more
269 sensitive in 11 of these. The dataset in Sewell *et al.* (2015) revealed little difference in
270 sensitivity between the sexes. There was no difference in the prevalence of death or
271 animals requiring euthanasia between the sexes, though some clinical signs were more
272 prevalent in one sex than the other (ano-genital staining was more prevalent in females than
273 males ($p = 0.0002$), whereas facial staining and gasping were marginally more common in
274 males ($p = 0.028$ and 0.044 respectively). However, the predictivity of these signs did not

275 differ between males and females, but the smaller numbers of studies in this analysis led to
276 wider confidence intervals.

277

278 The statistical simulations carried out by Price *et al.* (2011) showed that where there was an
279 unanticipated sex difference and testing was carried out in the less sensitive sex, this would
280 usually result in misclassification, regardless of the method used. Consequently, the new
281 test guideline proposes that a sighting study should be performed not only to determine a
282 suitable starting concentration for the main study but to also identify whether there is a more
283 sensitive sex. The sighting study is not recommended if there is existing information on
284 which to base these two decisions. Despite the earlier proposal that females should be the
285 default sex, the more recent data that failed to show any difference, and the general view of
286 the OECD coordinators, and their nominated inhalation experts, that males were potentially
287 more sensitive for inhaled substances, led to the proposal that males should be used in
288 preference.

289

290 The new sighting study uses a single male and a single female at one or more of the fixed
291 concentrations, depending on the outcome at each concentration as described by Stallard *et*
292 *al.* (2011) (Figure 4). If there is no difference in sensitivity between the sexes, then the
293 choice of sex for single sex studies for the FCP is irrelevant, and will not affect the
294 classification. Since males are now the default sex, if they are the more sensitive, correct
295 classification will still be made, since this is correctly based on the more sensitive sex. It is
296 only if females are the more sensitive sex and this is not correctly identified, that there is
297 potential for incorrect classification.

298

299 Though the risk of a sex difference is low, the new sighting study must be robust enough
300 despite using only one male and one female to identify the large differences in sensitivities
301 that might risk misclassification. To demonstrate this, we have carried out statistical

302 calculations of the probability of choosing the most sensitive sex, with varying ratios of male
303 and female sensitivity (i.e. LC_{50} values) (Figure 5). The methods are similar to those
304 described by Stallard *et al.* (2011). Figure 5 shows the classification probabilities using the
305 new sighting study for dusts and mists with a concentration-response curve slope of 4 and R
306 (the ratio of the LC_{50} and TC_{50} , the concentration expected to cause death or evident toxicity)
307 of 5 for both sexes, assuming a sighting study starting at 0.05mg/L. The heavy solid line
308 gives the probability of the correct classification given the LC_{50} . The heavy dashed line gives
309 the probability that the main study is conducted in females rather than males.

310

311 The first plot of Figure 5 corresponds to the case of no difference between the sexes (i.e.
312 males and females have identical LC_{50} values). In this case, the probability of the main
313 study being carried out in females varies around 0.25, and since there is no difference in
314 sensitivity this will not affect the classification. The other plots show what happens with
315 increasingly large sex differences, with the females becoming more susceptible. In these
316 cases the LC_{50} on the x -axis is that for the females, as this is the true value on which
317 classification should be based (since females are more sensitive), and the dashed line gives
318 the probability that the main study is conducted in the females. When the sex difference is
319 small, there is quite a high chance of erroneously testing in the males when the females are
320 marginally more sensitive. For example, for a LC_{50} ratio 1.5 the probability of incorrectly
321 testing in the males is more than 0.5 in many cases. However, since the sex difference is
322 small this is unlikely to impact the classification. As the sex difference increases, the chance
323 of seeing the sex difference in the sighting study and doing the main test in the females
324 correctly also increases. For a ratio of LC_{50} values of 10 or more the probability of choosing
325 females for the main test exceeds 0.9 except for the least toxic substances, when no effects
326 are seen in either sex even at the highest test concentration, or extremely toxic substances,
327 when deaths are seen in both sexes at the lowest test concentration. The probability of
328 misclassification is higher therefore for GHS classes 3 and 4.

329 These simulations show that the use of a single male and a single female in the sighting
330 study should be sufficient to identify broad differences in sensitivities. Since the effect of sex
331 differences is less when the concentration-response curve is steeper, these simulations
332 represent a worst-case scenario when based on a slope of 4, as it is estimated that only 1%
333 of substances have a concentration-response curve slope of less than this (Greiner, 2008).
334 Again, it is important to note that sex differences are relatively uncommon and only
335 unanticipated greater sensitivity in females is likely to influence classification. Furthermore,
336 for many substances prior knowledge may be also available (e.g. from the oral route) which
337 can be used to verify or indicate any suspected or apparent differences in sensitivity.

338 For the FCP method, the purpose of the sighting study is also to identify the starting
339 concentration for the main study where existing information is insufficient to make an
340 informed decision. A starting concentration should be chosen that is expected to cause
341 evident toxicity in some animals, and the use of two animals, one male and one female,
342 should be sufficient to determine whether this estimation is too high and allow a lower dose
343 to be used in the main study, particularly if existing data are available. The ATC method
344 does not include a sighting study and the choice of starting concentration is based on prior
345 knowledge or experience, or use of the suggested default starting concentrations of 10 mg/L,
346 1 mg/L or 2500 ppm for vapours, dusts/mists and gases, respectively. This is also an option
347 for the FCP method, since the sighting study is not compulsory. However, without the aid of
348 a sighting study, it is possible that an inappropriate starting concentration may be chosen,
349 which could result in testing at more concentrations and using more animals.

350 **4. Comparability to existing methods and retrospective analyses**

351 A number of publications have addressed the comparability of the three methods using
352 statistical calculations or simulations to compare the classifications made by each of the
353 three methods and the likelihood of misclassification (under or over) (Price *et al.* 2011;
354 Stallard *et al.* 2011; Stallard *et al.* 2003). The calculations described above were based on

355 hypothetical mortality concentration curves (with varying steepness) for a range of LC_{50}
356 values covering all five toxic classes to represent a wide range of hypothetical substances.
357 These include substances that clearly fall within a specific toxic class, (i.e. LC_{50} within the
358 mid-range of the class bracket) as well as those on the class border (i.e. the most or least
359 toxic substances in each class) where there is greater potential for misclassification. The
360 simulations also took into account the potential for variation between the actual
361 concentration tested and the intended fixed concentration. For the calculations, a variation
362 of +/- 25% was used although this is greater than that permitted in the TG (+/- 20%) so these
363 represent worst-case examples.

364 The statistical calculations showed that the three methods were comparable, although each
365 of the methods did have the potential to misclassify even though the risk of this was low
366 overall (Price *et al.*, 2011). If anything, the FCP tended to over-classify and the other two
367 methods to under-classify. The impact of misclassification (over or under) and the choice of
368 inhalation test method may raise some diversity of opinion depending on safety, commercial
369 and 3Rs (Replacement, Refinement and Reduction) perspectives. The tendency of the LC_{50}
370 and ATC methods to *under*-classify is more of a concern to human health than the FCP
371 tendency for *over*-classification. However, it is worth highlighting that the statistical models
372 that these conclusions were based on used a conservative 'worst-case' scenario, with a low
373 concentration-response slope of four, and the potential to over-classify becomes less with a
374 steeper concentration–response curve. Moreover, the models used a greater than permitted
375 variation of the actual concentration from that intended.

376 The statistical calculations described above show that the three methods are comparable,
377 particularly in the absence of sex differences, or where these have been taken into account
378 with the use of the sighting study. However, all these methods rely on the assumption of
379 correct identification or prediction of the LC_{50} value and the corresponding GHS class and
380 are not based on real data. We have therefore undertaken further analysis of the data set of
381 178 dusts and mists to make retrospective classifications by all three methods and to

382 compare their performance. For each method, the classifications were established using the
383 protocols and flow charts in their corresponding test guidelines, based on the order the
384 studies were carried out in practice (i.e. using the default or otherwise determined starting
385 concentration). Supplementary Data File 2 contains information on the 'classification rules'
386 for each method. For the LC₅₀ method, rather than establish an LC₅₀ value from the data, a
387 flowchart method was used based on whether more or less than 50% animals died at each
388 concentration (as in Figure 1 in Price *et al.* 2011). Only 'valid' concentrations corresponding
389 to within $\pm 20\%$ of the four fixed concentrations for dusts and mists in the ATC and FCP
390 protocols (0.05, 0.5, 1 and 5 mg/L) were included, to comply with the guidelines.
391 Retrospective classifications could only be made for substances where all the necessary and
392 valid concentrations were available. For example, in the FCP method, where testing started
393 at 1mg/L and there was no death or evident toxicity in any animal, further testing would be
394 required at 5mg/L. If this concentration had not been tested or fell outside of the $\pm 20\%$
395 criterion, then this substance could not be classified.

396 Retrospective classifications were made for 77 substances via the LC₅₀ method, 57
397 substances via ATC, and 124 substances for FCP. For the FCP, classifications were
398 generally able to be made using one or two concentrations requiring five to ten animals
399 (Table 7). For the ATC and LC₅₀ methods, classifications were generally made after two
400 concentrations, requiring 12 animals and 20 animals respectively.

401 There were 42 substances for which a retrospective classification was made via all three
402 methods (including based on females and males separately), and for 35 of these (83.3%) all
403 classifications were in agreement (Table 8). If using the LC₅₀ as the 'reference' method
404 (though as described above there are limitations for this method and potential for
405 misclassification), the ATC method under-classified by one class on three occasions. For
406 the FCP method, when conducted in males only, there was one occasion of over-
407 classification, and one of under-classification, both by one class. When the FCP was
408 conducted in females only, there was also one occasion of over-classification, in the

409 adjacent more stringent class, but three occasions of under-classification, one of these by
410 two classes (class 4 vs. class 2). The reasons for these differences could be because the
411 retrospective classification method was not able to take sex differences into account, or
412 because the LC_{50} value falls near a class border where there is greater potential for
413 misclassification. Table 9 shows that for 6 of these 7 substances there appears to be a
414 more sensitive sex. If for the FCP, the classification is made according to the most sensitive
415 sex, there are fewer disagreements with the classifications from the LC_{50} method. For
416 example, instead there are now three occasions where classification made via FCP differs
417 from LC_{50} , and these are all over-classifications into the adjacent more stringent class.
418 Whereas the three occasions where the ATC method differed from the LC_{50} method were
419 under-classifications into the less stringent adjacent class. This supports the conclusions
420 from the statistical calculations that show the FCP is comparable to the existing methods if
421 sex differences are taken into account.

422 Often it was not possible to make a retrospective classification using all three methods (e.g.
423 due to a missing concentration), and there are more examples of the classifications made by
424 two of the methods. Table 10 shows the agreement between any two of the methods. With
425 the exception of the male and female comparisons, which had an agreement of 76.5% and
426 87.0% for the FCP and LC_{50} methods respectively, there was over 90% agreement with all
427 combinations of the other methods. Supplementary Tables S1 -S7 compare the
428 classifications made by each of these methods. The difference between the male and
429 female comparisons may reflect differences in sensitivities between sexes and the fact that
430 for the other comparisons the same animals will have been used to make the classification,
431 which could not be done for the male and female comparisons. It is vital for the acceptance
432 of the new TG that there is strong agreement between the classifications made by the FCP
433 and the two accepted methods, irrespective of the sex used by the FCP.

434 However, as previously pointed out, a major difference between the three methods is the
435 number of studies required to make a classification and consequently the numbers of
436 animals used (Table 7).

437 **5. Summary and conclusions**

438 The new work described here strengthens and clarifies the conclusions of earlier
439 publications on the FCP method. In particular we have shown that evident toxicity can
440 reliably predict death or moribund status at the next highest fixed concentration irrespective
441 of the fold-change in concentration or the number of animals showing the sign of evident
442 toxicity, so demonstrating the robustness of the method.

443 As part of the OECD approval process, the simplicity of the definition of evident toxicity was
444 questioned (i.e. that evident toxicity is said to have been reached if only one of the four signs
445 is observed at least once in at least one animal). However, the dataset had been
446 extensively interrogated to look at multiple scenarios, including the effect of combinations of
447 signs, the duration of signs, and/or the number of animals displaying the sign(s) (see
448 sections 2.5 and 2.6 and Sewell *et al.*, 2015). Whilst predictivity did increase to some extent
449 for some of these, these were associated with wider confidence intervals, since the pool of
450 data also decreased. Clearly, if other data sets become available, it might be possible to
451 confirm these trends more precisely. Therefore, increases in severity and/or the number of
452 animals displaying the sign may increase confidence in the decision, but the statistical
453 analysis of the dataset supports the simple definition regardless of any of such additional
454 information.

455 The change of the default sex from female to male was an unexpected outcome from the
456 consultation with the OECD national coordinators, but there was no evidence from the
457 analysis of Sewell *et al.* (2015) for a consistent bias one way or the other. The decision
458 therefore to adopt males as the default sex was based on the experience of the national
459 coordinators and their nominated inhalation experts. However, since use of the less sensitive

460 sex could result in misclassification, it was important to establish that the proposed sighting
461 study with one male and one female would have the power to identify the more sensitive
462 sex, at least under those circumstances where the difference in sensitivity was large enough
463 that it might have led to wrong classification and in the absence of existing information on
464 sex differences. The results of the statistical analysis confirms that a sighting study with one
465 male and one female has the power to identify the more sensitive sex.

466 The retrospective analysis of the dataset to classify the chemicals by all three methods
467 (LC₅₀, ATC and FCP) was especially important in gaining acceptance of TG 433 by OECD.
468 Agreement between the three methods is very good as only 7 out of 42 substances showed
469 any disagreement between the three methods and then by only one class if the most
470 sensitive sex was selected for the FCP method. All three methods have the potential to
471 misclassify so it is important that the advantages and limitations of each test method are
472 understood so that users can select the most appropriate test method for their needs.
473 However in the absence of any other considerations, the FCP method is to be preferred
474 since it offers animal welfare benefits through the avoidance of death as an endpoint, and
475 other 3Rs benefits through the use of fewer animals and fewer studies when compared to
476 the ATC and LC₅₀ methods. We hope that these factors will encourage wide uptake and use
477 of the method in the future.

478 We attribute the reluctance to use the equivalent method for oral toxicity studies (TG 420) to
479 lack of guidance on evident toxicity and the absence of the detailed analyses described
480 here, that were needed to convince the OECD national coordinators that TG 433 was fit for
481 purpose. A similar exercise is therefore planned in collaboration with the European
482 Partnership for Alternatives to Animal Testing to examine clinical signs observed during
483 acute oral toxicity studies and to provide guidance that will encourage the use of TG 420.

484 The experience of gaining acceptance of the FCP method for acute inhalation has been both
485 positive and negative. The positive is the agreement to accept extensive retrospective

486 analysis as sufficient justification for a new test guideline without the need for prospective
487 validation studies which would have required further use of animals. This approach could no
488 doubt be used on other occasions. The negative is the inordinately long time it has taken to
489 get this method accepted even though the principle of evident toxicity had already been
490 accepted by OECD, and the cumbersome process of consultation and submission which
491 was required. Even now, the experience with the oral toxicity guideline TG 420 suggests that
492 there will still be work needed to ensure that TG 433 becomes the preferred method for
493 assessment of inhalation toxicity, and it is to be hoped that this will not take a further 13
494 years.

495

496 **Acknowledgements**

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498 Process, including the OECD secretariat, the OECD national co-ordinators and their
499 nominated experts.

500

501

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550 **Figure Legends**

551 **Figure 1:** LC₅₀ test (OECD test guideline 403) for dusts and mists, using example
552 concentrations, starting at 5 mg/L (Price et al., 2010). Please note the LC₅₀ test method does
553 not require fixed concentrations, but specifies that 10 animals (5 males and 5 females)
554 should be exposed at three different concentration levels. The concentration levels should
555 be sufficiently spaced to enable construction of a mortality curve so that an estimation of the
556 LC₅₀ can be obtained.

557

558 **Figure 2:** Acute toxic class (ATC) method for dusts and mists for an example starting
559 concentration of 5 mg/L (Price et al., 2010). Please note, the ATC method specifies that 6
560 animals (3 males and 3 females) are tested at fixed concentrations that form the upper limit
561 of the GHS categories. The starting concentration is either the highest concentration, or that
562 which is expected to lead to mortality in some of the exposed animals, based on prior
563 information.

564

565 **Figure 3:** Fixed concentration procedure (FCP) method for dusts and mists for an example
566 starting concentration of 5 mg/L (Price et al., 2010). Please note, the draft test guideline
567 specifies that substances are tested at fixed concentrations that form the upper limit of the
568 GHS categories. The starting concentration is chosen to be the fixed concentration level that
569 is most likely to lead to evident toxicity but not death.

570

571 **Figure 4:** FCP sighting study for dusts and mists.

572

573 **Figure 5:** Classification probabilities for the fixed concentration procedure (FCP) with the
574 new sighting study for dusts and mists with concentration-response curve slope of 4 and R
575 (LC₅₀/TC₅₀) of 5 assuming sighting study starting at 0.05 mg/L. The different plots show
576 varying sex differences, to assess the impact of increased female sensitivity compared to
577 male (i.e. female LC₅₀ increasingly lower than male LC₅₀). The vertical dotted line in each
578 plot indicates the classification boundary concentrations and the light solid line indicates the
579 cumulative probabilities of classification (on left-hand axis scale) into each toxic class for
580 LC₅₀ values shown. The heavy solid line gives the probability of the correct classification
581 given the LC₅₀. The heavy dashed line gives the probability that the main study is conducted
582 in females rather than males. For more information on these plots please refer to Stallard *et*
583 *al.* (2011).

584

585 **Supplementary data**

586 **Supplementary Data File 1:** Information on the predictivity and sensitivity of each of the
587 clinical signs observed in the dataset.

588 **Supplementary Data File 2:** 'Classification rules' for each method.

Table 1: Comparison of LC₅₀, ATC and FCP methods.

Parameter	LC₅₀ (concentration causing 50% lethality)	ATC (acute toxic class)	FCP (fixed concentration procedure)
OECD Test Guideline	403	436	433
Endpoint	Death	Death	Evident toxicity
Sighting study	No sighting study required.	No sighting study required.	<p>A sighting study may be carried out to help inform the starting concentration and choice of sex, if deemed necessary. This is not compulsory.</p> <p>1M+1F at one to four concentrations (usually only one or two concentrations required).</p> <p>The starting concentration should be that which is most expected to produce evident toxicity in some animals. If no prior information is available this should be 10 mg/L, 1 mg/L or 2500 ppm for vapours, dusts/mists and gases, respectively.</p>
Number of animals	<p>5M+5F per study.</p> <p>Usually three studies required.</p> <p>Min 10 – max 40 animals.</p>	<p>3M+3F per study.</p> <p>Usually at least two studies required (12 animals), though classification can sometimes be made based on one study, if testing at the lowest or highest concentrations (depending on the outcome).</p> <p>Numbers of animals range from 6 to max 24 (depending on the number of studies). An inappropriate starting concentration (causing too much or too little toxicity) may require testing at additional concentrations and may therefore result in higher numbers of animals being used.</p> <p>Where a marked sex difference is observed additional</p>	<p>Single (most sensitive) sex, or males only as default. 5 animals per study.</p> <p>Classification can often be made after a single study (5 animals).</p> <p>Numbers of animals range from 5 to max 20 (depending on the number of studies). Plus 2-8 in the sighting study (though the use of 8 animals in the sighting study would be very unusual, and only if the highest or lowest concentrations were chosen inappropriately as the starting concentration).</p> <p>An inappropriate starting concentration (causing too much or too little toxicity) may require testing at additional concentrations and may therefore result in</p>

		animals may be required.	higher numbers of animals being used. However, a sighting study should avoid this.
Number of concentrations	At least three concentrations (to enable production of a concentration-mortality curve and estimation of LC ₅₀).	An 'up and down method' is used, requiring 1 to 4 fixed concentrations (based on the upper limit of the GHS classification system) depending on the outcome at each concentration. Generally at least two concentrations are required to make a classification. Sometimes a classification can be made based on only one study if starting at the highest or lowest fixed concentration, and depending on the outcome.	An 'up and down method' is used, requiring 1 to 4 fixed concentrations (based on the upper limit of the GHS classification system) depending on the outcome at each concentration. A classification can often be made based on one study only.
Starting concentration	n/a This is not a sequential method. At least three concentrations are required to enable production of a concentration-mortality curve and estimation of LC ₅₀ .	Starting concentration level should be that which is most likely to produce toxicity in some animals. If no prior information is available the starting concentration will be 10 mg/L, 1 mg/L or 2500 ppm for vapours, dusts/mists and gases, respectively. An inappropriate starting concentration (causing too much or too little toxicity) may require testing at more concentrations than if a more appropriate concentration had been chosen.	Starting concentration level should be that which is most expected to produce evident toxicity in some animals. The sighting study may inform this choice, or prior information if available. If a sighting study has not been conducted or is inconclusive, or if no prior information is available the starting concentration will be 10 mg/L, 1 mg/L or 2500 ppm for vapours, dusts/mists and gases, respectively. An inappropriate starting concentration (causing too much or too little toxicity) may require testing at more concentrations than if a more appropriate concentration had been chosen. The use of a sighting study should avoid this.
Classification Method	Based on a point estimate of LC ₅₀ which allows classification according to the GHS classification system.	Based on an interval estimate of LC ₅₀ , so that classification is based on the toxic class that the estimated LC ₅₀ falls within, using the GHS classification system.	LC ₅₀ is inferred through the use of evident toxicity to <i>predict</i> death at a higher dose, and classification made according to the inferred LC ₅₀ using the GHS classification system.

Table 2: GHS classification system for inhalation. For the LC₅₀ method, a point estimate of the LC₅₀ allows classification into the relevant GHS class according to the table. The ATC method estimates which class the LC₅₀ falls within and makes classification on that basis, whereas classifications made by FCP are based on the *inferred* LC₅₀.

GHS category	Vapours (mg/L)	Dusts and mist (mg/L)	Gases (ppm)
1 (most toxic)	≤0.5	≤0.05	≤100
2	>0.5 and ≤2	>0.05 and ≤0.5	>100 and ≤500
3	>2 and ≤10	>0.5 and ≤1	>500 and ≤2,500
4	>10 and ≤20	>1 and ≤5	>2,500 and ≤20,000
5	>20	>5	>20,000

GHS, Globally Harmonised System; LC₅₀, median concentration; ppm, parts per million.

Table 3: Clinical signs indicating evident toxicity (PPV, sensitivity and specificity)

Clinical signs	PPV (95% CI)	Sensitivity (95% CI)	Specificity (95% CI)
Hypoactivity	100.0 (92.4 - 100.0)	18.4 (13.6 - 24.1)	100.0 (95.2 - 100.0)
Tremors	100.0 (68.8 - 100.0)	3.90 (1.90 - 7.20)	100.0 (95.2 - 100.0)
Bodyweight loss	94.0 (84.6 - 98.4)	22.7 (17.4 - 28.8)	95.1 (87.2 - 98.7)
Irregular respiration	89.0 (80.9 - 94.5)	35.3 (29.0 - 42.0)	85.2 (74.7 - 92.5)

CI, Confidence Interval; PPV, positive predictive value.

Table 4: Number of animals displaying a clinical sign in isolation, and the total number of animals displaying the sign.

Clinical sign	No. animals displaying sign ONLY (%)		Total no. animals displaying the sign
Irregular respiration	137	(42%)	325
Body staining	27	(27%)	99
Hypoactivity	12	(16%)	77
Laboured respiration	12	(16%)	77
Faeces reduced	13	(12%)	107
Hunched posture	18	(8%)	227
Ano-genital staining	4	(8%)	51
Naso-ocular discharge	6	(7%)	89
Congested respiration	4	(5%)	87
Facial staining	3	(5%)	65
>10% bodyweight loss	2	(2%)	93
Noisy respiration	1	(0.4%)	267

Table 5: Studies where irregular respiration was observed only once in one animal at the lower concentration in females, with no other signs.

Study	Concentration tested	Female observations		Male observations	
		Number of Deaths	Number with evident toxicity	Number of Deaths	Number with evident toxicity
1	0.05 mg/L	0	1	0	4
	0.5 mg/L	5	-	3	2
	2 mg/L	5	-	5	0
2	0.06 mg/L	0	1	0	5
	0.5 mg/L	2	3	3	2
	2 mg/L	4	1	5	-
3	0.5 mg/L	0	1	0	4
	2 mg/L	2	3	2	3
4	0.05 mg/L	0	1	0	2
	0.2 mg/L	5	-	5	-
	2 mg/L	5	-	5	-
	5 mg/L	5	-	5	-
5	0.06 mg/L	0	1	n/a	n/a
	0.5 mg/L	2	3	0	5
	2 mg/L	5	-	5	0

Table 6: PPV (95% confidence interval) for highly predictive signs with 2, 5 or 10-fold concentration change between the lower and higher concentration.

Clinical sign	≥2-fold (95% CI)	≥5-fold (95% CI)	≥10-fold (95% CI)
Tremors	100.0 (68.8 - 100.0)	100.0 (5.0 - 100.0)	100.0 (5.0 - 100.0)
Hypoactivity	100.0 (92.0 - 100.0)	100.0 (47.3 - 100.0)	100.0 (47.3 - 100.0)
>10% bodyweight loss	91.7 (79.0 - 97.8)	85.7 (47.0 - 99.3)	100.0 (36.8 - 100.0)
Irregular respiration	89.0 (80.9 - 94.5)	95.8 (81.2 - 99.8)	100.0 (86.1 - 100.0)
Body staining	88.5 (71.8 - 97.0)	100.0 (60.7 - 100.0)	100.0 (22.4 - 100.0)
Ano-genital staining	86.4 (67.3 - 96.4)	0.0 (0.0 - 95.0)	100.0 (5.0 - 100.0)
Faeces reduced	85.3 (70.4 - 94.4)	100.0 (47.3 - 100.0)	100.0 (47.3 - 100.0)
Naso-ocular discharge	84.2 (70.1 - 93.3)	100.0 (74.1 - 100.0)	100.0 (65.2 - 100.0)
Noisy respiration	80.5 (70.9 - 88.0)	94.1 (74.3 - 99.7)	100.0 (68.8 - 100.0)
Hunched posture	78.0 (65.0 - 87.8)	87.5 (64.5 - 97.8)	100.0 (54.9 - 100.0)
Gasping	76.5 (52.5 - 92.0)	100.0 (22.4 - 100.0)	100.0 (22.4 - 100.0)

Table 7: Number of studies required to make a classification, and the associated number of animals.

No. studies to make a classification	FCP			ATC		LC ₅₀	
	No. animals involved	No. studies		No. animals involved	No. studies	No. animals involved	No. Studies
		FCP-F	FCP-M				
1 study	5	54	64	6	18	10	32
2 studies	10	46	41	12	37	20	41
3 studies	15	1	3	18	2	30	3
4 studies	20	0	1	24	0	40	1

Table 8: Classifications made by all three methods, showing the number of substances classified into each class and the number of substances where there was a disagreement between the three methods (which is expanded on in Table 9).

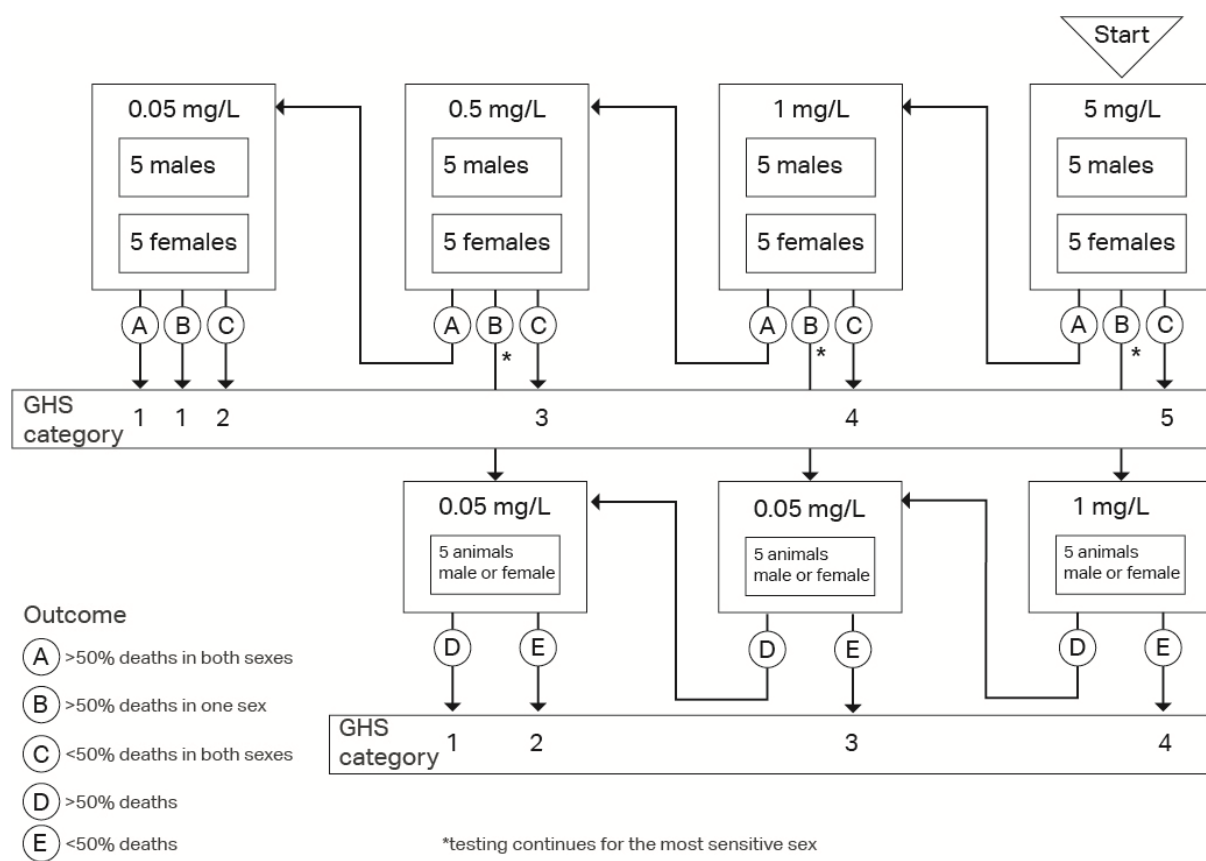
Classification	No. substances
Class 1	1
Class 2	11
Class 3	3
Class 4	14
Class 5	6
Disagreements	7

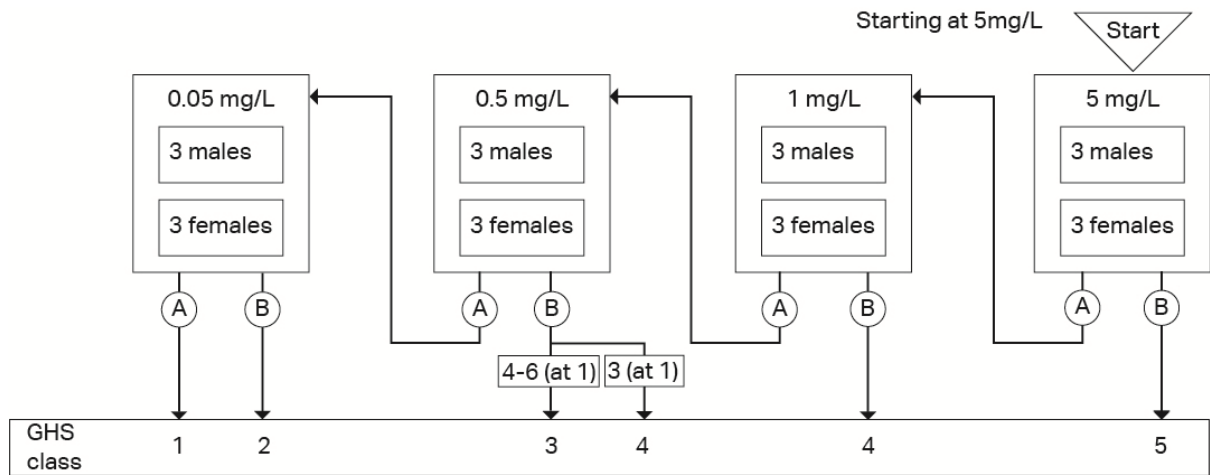
Table 9: Substances where there were differences in retrospective classifications made via the LC₅₀, ATC and FCP methods. FCP retrospective classifications were made for both females (F) and males (M) only. For each substance the concentrations tested, the number of deaths and/or animals with evident toxicity are indicated.

Substance	Concentrations tested	No. deaths		No. evident toxicity		Classification				
		F	M	F	M	LC ₅₀	ATC	FCP(F)	FCP(M)	
1	0.5mg/L	0	0	0	0	3	4	3	4	
	1 mg/L	4	1	1	0					
2	1 mg/L	0	0	4	4	5	5	4	5	
	5 mg/L	2	1	3	4					
3	1 mg/L – males	-	0	-	0	5	5	5	4	
	5 mg/L	0	2	5	3					
4	1 mg/L – males	-	0	-	5	4	5	5	4	
	5 mg/L	0	3	5	2					
5	0.05 mg/L	0	0	0	0	2	2	4	2	
	0.5 mg/L	3	4	0	0					
	1 mg/L	1	4	2	0					
6	1 mg/L	0	0	0	0	5	5	4	5	
	5 mg/L	2	0	3	5					
7	0.5 mg/L	0	0	0	0	3	4	4	3	
	1 mg/L	1	3	4	2					
	5 mg/L	5	5	-	-					

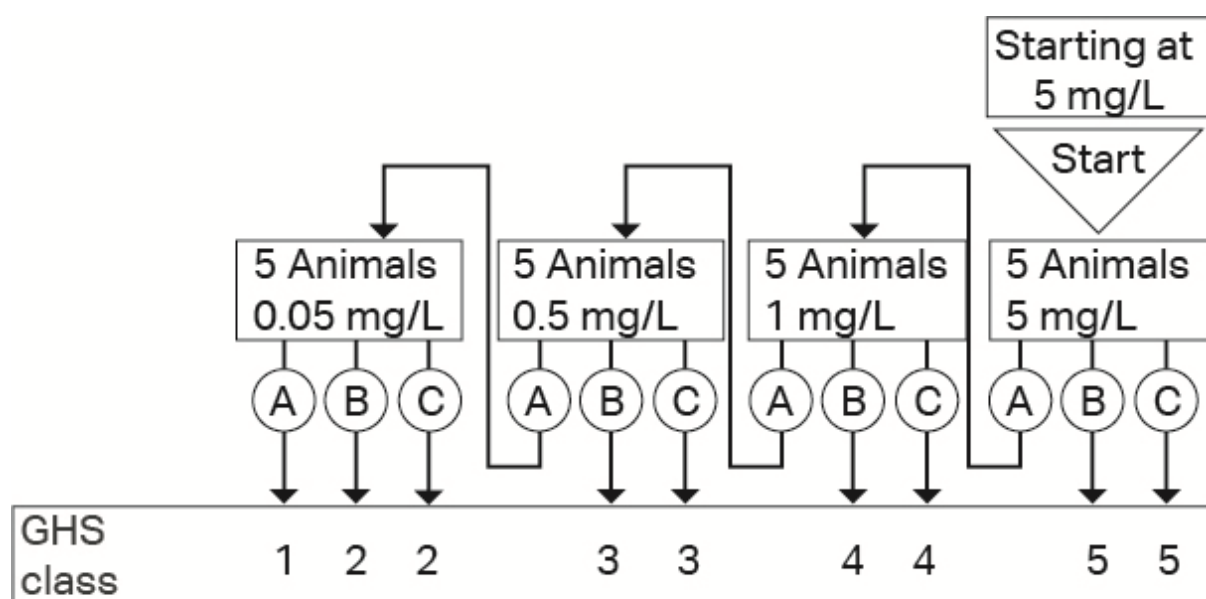
Table 10: Differences in classifications between the three methods, showing the numbers of substances for which pairwise comparisons were made, and the number for which there was agreement between the two methods.

Comparison	No. classified	No. substances in agreement	% agreement
FCP-M vs. FCP-F	85	65	76.5%
LC ₅₀ -M vs. LC ₅₀ -F	46	40	87.0%
ATC vs. FCP-F	46	42	91.3%
LC ₅₀ vs. FCP-F	43	40	93.0%
LC ₅₀ vs. FCP-M	44	41	93.2%
ATC vs. FCP-M	51	48	94.1%
LC ₅₀ vs. ATC	46	44	95.7%



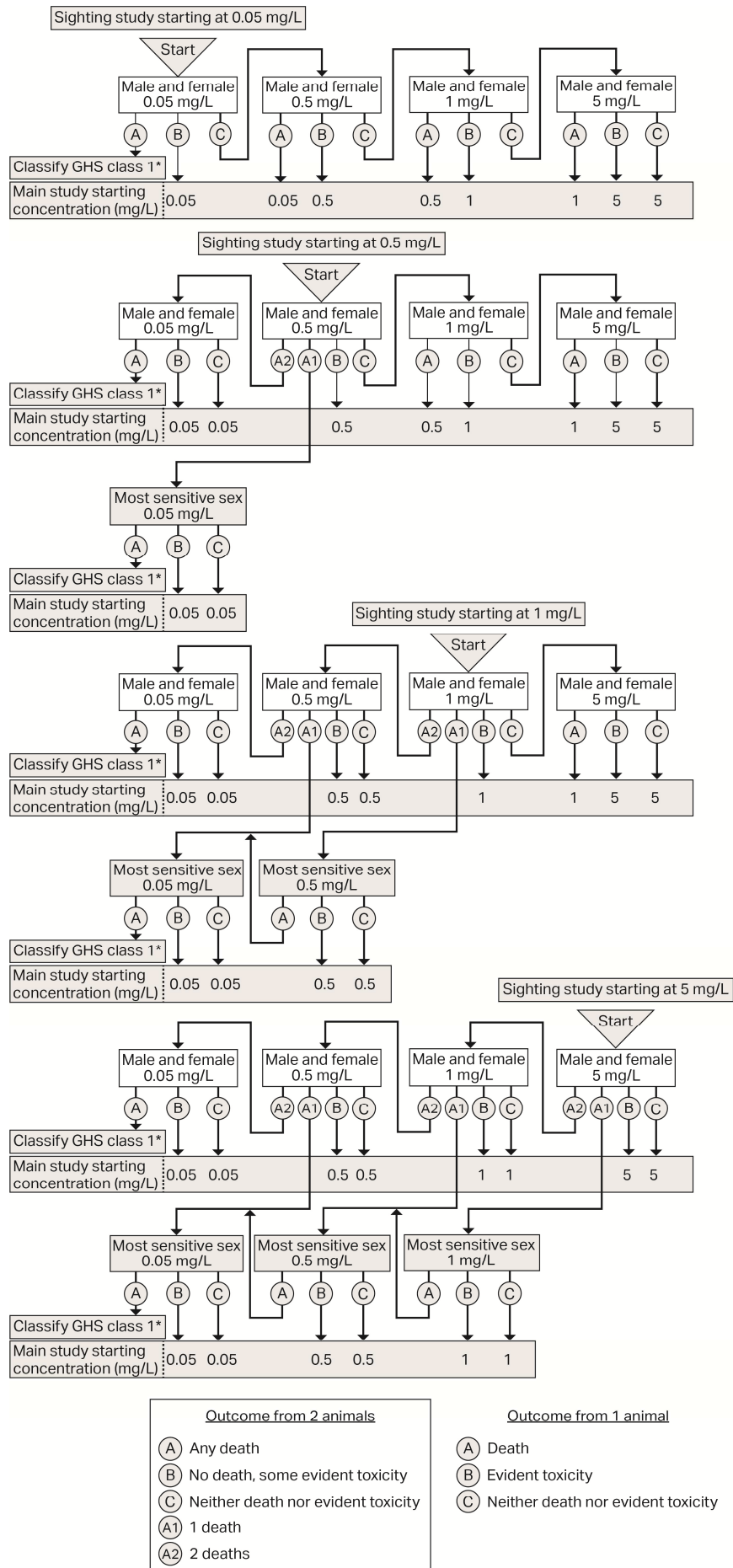


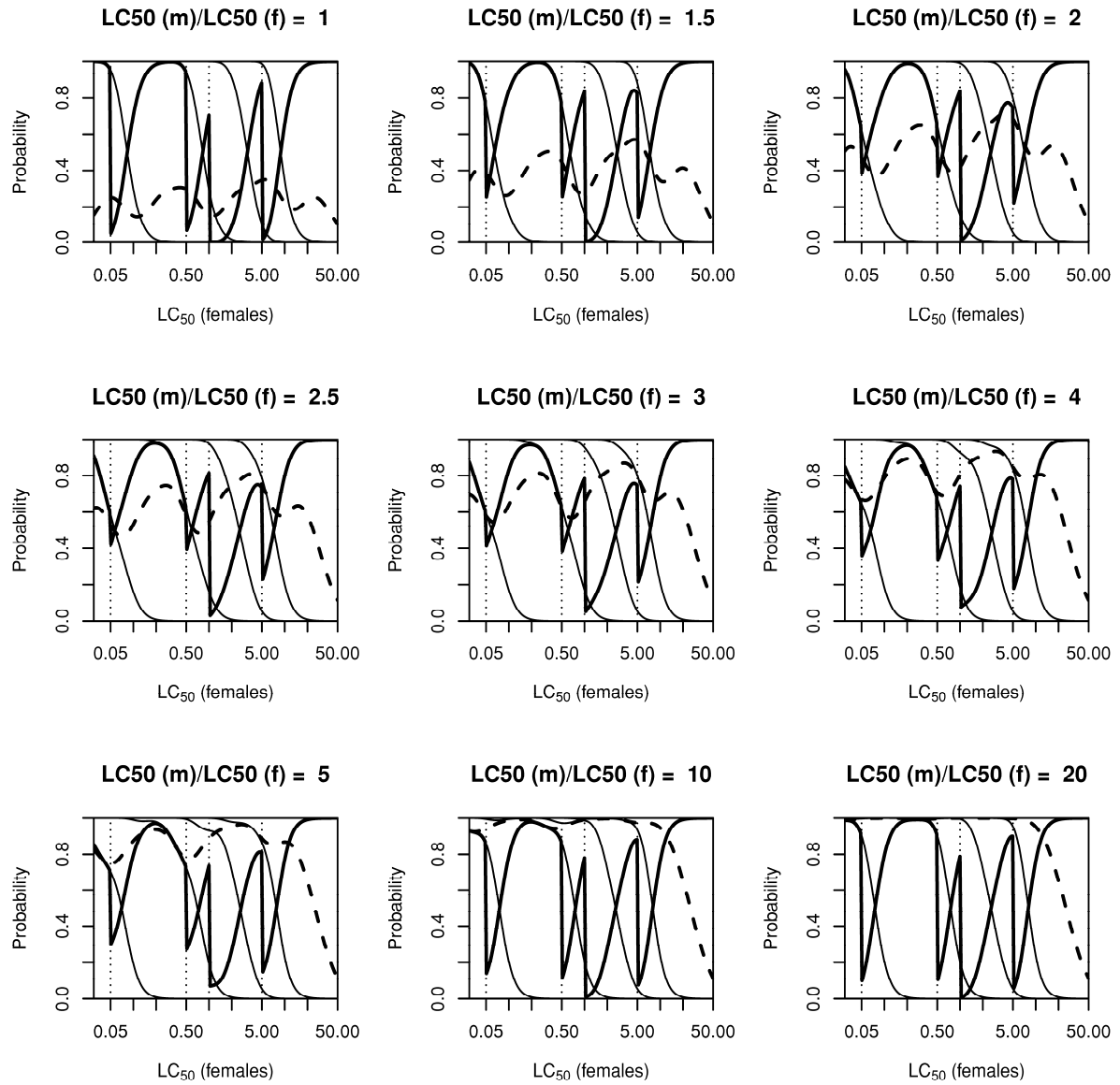
(A) $\geq 50\%$ deaths (3-6 animals) (B) $< 50\%$ deaths (0-2 animals)

**Outcome**

- (A) 2 or more deaths (B) 1 or more with evident toxicity and/or 1 death (C) Neither death nor evident toxicity

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Highlights:

The FCP for acute inhalation toxicity has been accepted by OECD as TG433.

TG433 uses evident toxicity while other approved methods use lethality.

A sighting study with 1 M and 1 F animal reliably identifies the more sensitive sex.

The three methods (LC₅₀, ATC, FCP) showed good agreement in a retrospective analysis.