

# 1 Variability in cyanobacteria sensitivity 2 to antibiotics and implications for 3 Environmental Risk Assessment

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17 **Abstract**

18 Once released into the environment antibiotics can kill or inhibit the growth of  
19 bacteria, and in turn potentially have effects on bacterial community structure  
20 and ecosystem function. Environmental risk assessment (ERA) seeks to establish  
21 protection limits to minimise chemical impacts on the environment, but recent  
22 evidence suggests that the current regulatory approaches for ERA for antibiotics  
23 may not be adequate for protecting bacteria that have fundamental roles in  
24 ecosystem function. In this study we assess the differences in interspecies  
25 sensitivity of eight species of cyanobacteria to seven antibiotics (cefazolin,  
26 cefotaxime, ampicillin, sulfamethazine, sulfadiazine, azithromycin and  
27 erythromycin) with three different modes of action. We found that variability in  
28 the sensitivity to these antibiotics between species was dependent on the mode  
29 of action and varied by up to 70 times for  $\beta$ -lactams. Probabilistic analysis using  
30 species sensitivity distributions suggest that the current predicted no effect  
31 concentration PNEC for the antibiotics may be either over or under protective of  
32 cyanobacteria dependent on the species on which it is based and the mode of  
33 action of the antibiotic; the PNECs derived for the macrolide antibiotics were  
34 over protective but PNECs for  $\beta$ -lactams were generally under protective. For  
35 some geographical locations we identify a significant risk to cyanobacteria  
36 populations based upon measured environmental concentrations of selected  
37 antibiotics. We conclude that protection limits, as determined according to  
38 current regulatory guidance, may not always be protective and might be better  
39 derived using SSDs and that including toxicity data for a wider range of (cyano-)  
40 bacteria would improve confidence for the ERA of antibiotics.

41 **Keywords:**

42 Antibiotics; Antimicrobial resistance; Environmental risk assessment;

43 Pharmaceuticals; Species sensitivity distribution; Predicted No Effect

44 Concentration

## 45 **1. Introduction**

46 Antibiotics are designed to kill or inhibit the growth of bacteria and are  
47 fundamental in the treatment of pathogens in human and veterinary healthcare.  
48 Following their release into the environment however, non-target bacteria may  
49 be affected and the vital ecosystem services they facilitate may be disrupted as a  
50 consequence, which include primary productivity, nutrient cycling and  
51 contaminant degradation (Dopheide *et al.*, 2015; Grenni *et al.*, 2018; Kümmerer,  
52 2009). Aquatic ecosystems are especially at risk due to the concentrations of  
53 antibiotic inputs received from manufacturing plants and hospital effluents,  
54 wastewater treatment plants (WWTP), aquaculture, and run-off from agriculture  
55 (Batt *et al.*, 2007; Brown *et al.*, 2006; Cabello, 2006; Jaimes-Correa *et al.*, 2015;  
56 Larsson, 2014; Larsson *et al.*, 2007; Li *et al.*, 2008; Liu *et al.*, 2017; Watkinson *et*  
57 *al.*, 2009). The European regulatory environmental risk assessment (ERA) for  
58 antibiotics aims to establish protection limits that prevent “risk of undesirable  
59 effects on the environment” (EC, 2001), but the effectiveness of the current  
60 approach to do so has been questioned (Agerstrand *et al.*, 2015; Brandt *et al.*,  
61 2015; Le Page *et al.*, 2017). In addition, many antibiotics lack data for  
62 environmental bacteria due to the regulatory requirement for ERA testing only  
63 coming into force in 2006; before which most antibiotics had already been  
64 approved (Le Page *et al.* 2017). Consequently, there is an urgent need to assess  
65 whether the protection limits currently derived according to the current ERA  
66 guideline for antibiotics are able to protect against undesirable effects on the  
67 environment.

68

69 In the European ERA for human medicinal products and the VICH guidelines for  
70 veterinary antibiotics, protection limits for pharmaceuticals, including  
71 antibiotics, are represented by a predicted no effect concentration (PNEC). This  
72 is calculated by applying an assessment factor (AF) of 10 to the lowest no  
73 observed effect concentration (NOEC) following testing upon a cyanobacteria  
74 (green algae when not an antibiotic), invertebrate, fish and an activated sludge  
75 respiration inhibition test (ASRIT); i.e the PNEC is calculated by dividing the  
76 lowest NOEC by 10. The ASRIT however, is not sensitive to antibiotics  
77 (Kümmerer, 2009; Le Page *et al.*, 2017) and consequently only a single species of  
78 cyanobacteria represents all bacterial diversity in an antibiotic ERA that also  
79 measures a single functional endpoint: primary productivity. Additionally, most  
80 tests use either *Anabaena flos-aquae* (particularly in the case of regulatory  
81 studies) or *Microcystis aeruginosa*, providing a limited understanding of  
82 cyanobacteria interspecies sensitivity. In a revised version of the EMA guidance  
83 for ERA that is currently under consultation, however, it is advocated that two  
84 cyanobacteria species should be tested and fish are only tested when the  
85 pharmaceutical targets are present. The AF is applied to account for uncertainty  
86 due to interspecies variability and the extrapolation from controlled laboratory  
87 studies to the field. But the application of an AF of 10 for antibiotics is  
88 unsupported by experimental data and evidence shows that in some cases  
89 interspecies bacterial sensitivity may exceed this by several orders of magnitude  
90 (Chapman *et al.*, 1998; Le Page *et al.*, 2017). Consequently, there may be cases  
91 where the PNEC is not protective of all species in the environment. Moreover, a  
92 PNEC calculated this way has two potential drawbacks: firstly, the NOEC has  
93 been heavily criticised due to its dependence on the design of the experiment

94 conducted to derive it (Green *et al.*, 2013) and secondly, because it uses only a  
95 single effect value (the NOEC); quantification of the uncertainty around the PNEC  
96 is not determined (Chapman *et al.*, 1998).

97 A second approach for establishing protection limits that overcomes some of the  
98 problems associated with the current PNEC approach is through the  
99 construction of a species sensitivity distribution (SSD). A SSD is a probability  
100 model of interspecies variability across a toxicity endpoint following chemical  
101 exposure (e.g. NOEC or EC<sub>x</sub>) and it allows prediction of the proportion of species  
102 affected at any concentration for the species group modelled (Aldenberg *et al.*,  
103 2001; Belanger *et al.*, 2017; Wheeler *et al.*, 2002). SSDs are more commonly used  
104 for higher tier ERA in plant protection product regulations (EFSA, 2013) or in the  
105 Water Framework Directive (European Commission Joint Research Centre,  
106 2003). The protection limit most often derived from a SSD is the hazardous  
107 concentration that affects no more than 5% of species (HC5), although it has  
108 been suggested that the lower 95% confidence limit of the HC5 (HC5<sub>2.5%</sub>) should  
109 be used to ensure a truly protective limit (Verdonck *et al.*, 2001; Wheeler *et al.*,  
110 2002). This lower, more protective limit, however, will have more statistical  
111 uncertainty. An AF of less than 10 is sometimes applied depending on the  
112 specific regulations and quality/quantity of the data on which the SSD is based  
113 (EFSA, 2013).

114 In the past SSDs have been criticised for being ecologically unrealistic and for a  
115 lack of statistical robustness but recent advances allow for the mitigation of  
116 some of these concerns (Forbes and Calow, 2002; Kon Kam King *et al.*, 2015; Kon  
117 Kam King *et al.*, 2014). Importantly, SSDs are influenced by the quality and

118 number of data included, as well as the choice of taxa, their sensitivity to the  
119 mode of action and the even representation of the taxonomic groups of interest.  
120 Where previously a sample size of 10-15 species was required for a robust  
121 analysis (TGD, 2003), newer protocols that use bootstrap regression and the  
122 incorporation of censored data now allow for the computation of reliable  
123 statistics from a limited dataset (<10 data points) (Kon Kam King *et al.*, 2014;  
124 Wheeler *et al.*, 2002). Fewer species therefore are arguably required to reliably  
125 model the lower tail of the SSD (comprising the most sensitive species) from  
126 which a protection limit could be derived, providing they are all known to be  
127 sensitive to the mode of action (MoA) of the chemical. This is because the SSD  
128 focuses upon the species most at risk and the distribution will not be impacted  
129 by non-sensitive species or taxonomic clades (Schmitt-Jansen *et al.*, 2008;  
130 Segner, 2011).

131 It is not uncommon for the measured environmental concentrations (MECs) of  
132 antibiotics to exceed the PNEC in the environment, especially in WWTP, hospital  
133 and manufacturing effluents (Batt *et al.*, 2007; Brown *et al.*, 2006; Jaimes-Correa  
134 *et al.*, 2015; Larsson, 2014; Larsson *et al.*, 2007; Li *et al.*, 2008; Watkinson *et al.*,  
135 2009). In these cases it is likely that there is a risk to bacterial communities and  
136 the ecosystem functions that they provide. By considering these MECs in relation  
137 to a SSD it is possible to obtain an indication of the proportion of species that  
138 may be at risk.

139 In a recent meta-analysis of all publicly available literature we identified that  
140 cyanobacteria sensitivity to antibiotics may vary by up to 100,000 times (Le Page  
141 *et al.*, 2017). For some antibiotics a sensitivity difference exceeding the AF of 10

142 occurred between the most sensitive species, most commonly, *Microcystis*  
143 *aeruginosa*, and the two species recommended in the OECD 201 test guideline for  
144 establishing protection limits, namely *Anabaena flos-aquae* and *Synechococcus*  
145 *leopoliensis*. Although in some cases when *A. flos-aquae* was the most sensitive  
146 species the assessment factor of 10 did appear to be protective. The  
147 aforementioned meta-analysis was based on an assessment of published data  
148 and collated studies performed using different methodologies and test  
149 conditions in different laboratories by different researchers. Accurate  
150 numeration and confidence in relative sensitivities to antibiotic exposure in  
151 cyanobacteria species are best derived through comparative experiments  
152 conducted under the same test design without inter-laboratory variation.

153

154 To this end we optimised a microplate growth inhibition assay to assess the  
155 effects of antibiotic on population growth for eight species of phylogenetically  
156 diverse cyanobacteria (as assessed by their genome sequences (Shih *et al.*,  
157 2013)) culturable under laboratory conditions that are of environmental  
158 relevance (Le Page *et al.* under review). We focused on cyanobacteria due to  
159 their current key role within ERA and because they are a diverse bacterial clade  
160 of photoautotrophs that are ubiquitous in both aquatic and terrestrial  
161 environments, play key roles in many bacterial communities, and they have a  
162 range of important ecological functions such as primary production and nitrogen  
163 fixation (Falkowski, 1997).

164

165 Seven antibiotics were selected that spanned both a range of antibiotic classes  
166 and modes of action (MoA) in order to assess the impact MoA may have on the



167 degree of interspecies sensitivity observed. These included; i) three cell envelope  
168 synthesis inhibiting antibiotics,  $\beta$ -lactams, which target penicillin binding  
169 proteins (which catalyse the building of the peptidoglycan cell membrane of  
170 bacteria) namely, cefazolin and cefotaxime (1<sup>st</sup> and 3<sup>rd</sup> generation  
171 cephalosporins, respectively) and ampicillin (a penicillin); ii) two DNA synthesis  
172 inhibitors, sulfadiazine and sulfamethazine (sulfonamides) that prevent the  
173 production of folic acid, a key precursor in the DNA synthesis pathway; and iii)  
174 two protein synthesis inhibitors, erythromycin and azithromycin (macrolides),  
175 which inhibit the normal functioning of the bacterial ribosome. The macrolides,  
176 azithromycin and erythromycin are both candidates to be priority substances in  
177 the EU Water Framework Directive watch list (Carvalho *et al.*, 2015) and US EPA  
178 contaminate list 3 (US EPA, 2009). Cefazolin and sulfamethazine have no  
179 ecotoxicological data available for cyanobacteria in the open literature.  
180 Sulfadiazine, cefotaxime and azithromycin have very limited ERA relevant  
181 ecotoxicological data (Le Page *et al.*, 2017).

182

183 We addressed the hypothesis that current protection limits for antibiotics in  
184 surface water (PNEC<sub>sw</sub>) are not fully protective of all cyanobacteria populations.  
185 We first determined the interspecies sensitivity differences of eight species of  
186 cyanobacteria by performing growth inhibition assays. We then established SSDs  
187 and compared the PNEC calculated according to current guidance with the HC5  
188 and HC5<sub>2.5%</sub> to determine the proportion of species that would be affected  
189 following exposure to the PNEC determined from these results. Finally, based on  
190 our SSDs, we calculated the proportion of cyanobacteria likely to be affected  
191 using published MECs.

## 192 2. Materials and methods

### 193 2.1. Test organisms and maintenance

194 We selected eight cyanobacteria species: *Anabaena flos-aquae* (CCAP 1403/13A),  
195 *Synechococcus leopoliensis* (CCAP 1405/1), *Anabaena cylindrica* (PCC 7122),  
196 *Synechococcus elongatus* (PCC 6301), *Synechococcus sp* (PCC 6312), *Synechocystis*  
197 *sp* (PCC 6803), *Cyanobium gracile* (PCC 6307) and *Geminocystis herdmanii* (PCC  
198 6308). The basis for the selection of each species is given in Supplementary  
199 material A.

200

201 Continuous cultures of exponentially growing cyanobacteria were maintained in  
202 50mL BG-11 medium ((Rippka *et al.*, 1979); using laboratory grade constituents  
203 of >97% purity). Cultures were incubated in Multitron II incubators (Infors)  
204 under test conditions. Cultures were examined visually using an inverted light  
205 microscope to ensure cells appeared healthy before testing.

### 206 2.2. Antibiotics

207 Seven antibiotics were selected: cefozolin sodium salt (CAS: 27164-46-1; purity  
208 ≥98%; Tokyo Chemical Industry UK Ltd (TCI)), cefotaxime sodium salt (CAS:  
209 64485-93-4; purity ≥ 91.6%; Sigma-Aldrich), ampicillin trihydrate (CAS: 7177-  
210 48-2; purity ≥98%; TCI), sulfadiazine (CAS: 68-35-9; purity ≥99%; Sigma-  
211 Aldrich), sulfamethazine (CAS: 57-68-1; purity ≥98%; TCI), azithromycin  
212 dihydrate (CAS: 117772-70-0; purity ≥98%; TCI) and erythromycin (CAS: 114-  
213 07-8; purity ≥98%; TCI). These antibiotics span three MoAs that are detailed  
214 above in the introduction. Additional rationale for their choice was based upon

215 one or a combination of the following; i) being a compound of regulatory concern  
216 (Carvalho *et al.*, 2015; US EPA, 2009), ii) having suitable solubility in the test  
217 media, and iii) having limited or no cyanobacteria data available in the literature.  
218 A summary of the chemical properties is given in table 1.

### 219 **2.3. Growth inhibition assays**

220 Growth rate inhibition assays were performed in 96 well microplates that  
221 followed a procedure adapted from the (Environment Canada, 2007) and (OECD,  
222 2011) test guidelines which was developed as a medium throughput test and  
223 aims to identify which species are susceptible than others and of which the  
224 development and validation is documented in (Le Page *et al.*, under review).  
225 Biomass was measured using phycocyanin fluorescence as a surrogate  
226 (excitation = 590 nm, emission = 650 nm, cut-off = 635 nm; bottom read mode;  
227 Spectromax M5 with Softmax® Pro software (Molecular Devices)). This has been  
228 previously demonstrated to have a linear relationship with cell density for all  
229 species except *A. flos-aquae* that had a shallower gradient at cell densities below  
230 eight artificial fluorescence units (AFU, Le Page *et al.*, under review).

231

232 A pre-culture for each species was prepared between three and four days prior  
233 to the start of the test in 50 mL of BG-11 under the experimental exposure  
234 conditions (but in the absence of the antibiotic) in order to obtain exponentially  
235 growing cells. A cyanobacteria inoculum was prepared in BG-11 medium at a  
236 phycocyanin fluorescence of 4 AFU (twice the nominal starting inoculum).  
237 Following this a geometric series of stock solutions for each test concentration  
238 were prepared in BG-11 medium at double the nominal test concentrations.

239 100µL of test solution was added to 100 µL of cyanobacteria inoculum to achieve  
240 a final cyanobacteria density at 2 AFU at the nominal test concentration in each  
241 well. Assays were conducted in non-transparent, 96 well plates (Greiner Bio-one  
242 item no. 650201), sealed with AMPLIseal™ sealer (Greiner Bio-one item no.  
243 676040) to prevent water loss due to evaporation over the test period. The plate  
244 layout for the incubations described is provided in Supplementary material A.

245

246 The assays were run in Multitron II incubators (Infors) under the following test  
247 conditions: light intensity = 4000 lux, temperature = 28 +/- 1°C and shaking =  
248 140 rpm. The test lengths were optimised to ensure toxicity testing was carried  
249 out, as best as possible, during exponential growth for each species, and these  
250 were: i) 24 hours for the fastest growing species, *S. leopoliensis*, *S. elongates* and  
251 *Synechococcus sp.*; ii) 48 hours for *A. flos-aque* and *Synechocystis sp.* The  
252 exception here was for the exposure of the *Synechocystis sp.* to sulfadiazine  
253 where due to a slower growth rate than expected, an exposure period of 72  
254 hours was adopted; iii) 72 hours for the slower growing species, *A. cylindrical*, *C.*  
255 *gracile* and *G. herdmanii*. (Le Page *et al.*, under review) provides further  
256 discussion around the selection of exposure times and the potential  
257 consequences for their extension or reduction, although we highlight that with  
258 the current set up we cannot discern the magnitude of effect of the technical  
259 uncertainty caused by comparing several species and how this may impact on  
260 the biological differences observed.

261

262 Daily cell density determinations were made for each well via measurement of  
263 phycocyanin fluorescence. pH was measured in the stocks and in a replicate of

264 each test concentration for each species at the end of the test using micro pH  
265 meter (Jenco 6230N; pH probe: Hanna instruments HI1083) to ensure  
266 fluctuations did not exceed the acceptable limits of  $\pm 0.2$  as defined by most  
267 standardised test guidelines (OECD, 2011).

268

269 For the azithromycin exposure, dimethyl sulfoxide (DMSO) was used as a solvent  
270 carrier at a concentration of 10  $\mu\text{l/L}$ . Ten solvent control replicates were  
271 employed and comparisons of the dilution water control and solvent control  
272 replicates for all species are provided in Supplementary material A. Growth rate  
273 was found not to be significantly different from the dilution water control for any  
274 cyanobacteria with exception of *A. flos-aquae* and *S. elongates* where small but  
275 significant decreases in growth rate ( $p < 0.01$ ) were observed in the solvent  
276 control (two tailed t.test in R, version 3.3.0; R Project for Statistical Computing,  
277 Vienna, Austria). All dose-response curves and subsequent statistical  
278 comparisons with antibiotic exposures were performed using the solvent control  
279 data.

Antibiotic	Primary pharmacological Target <sup>a</sup>	Log Kow <sup>b</sup>	pKa <sup>b</sup>	Log Dow (pH 8) <sup>b</sup>	Solubility at pH 8.0 <sup>b</sup> (g/L)
Cefazolin	Penicillin binding protein	-1.52	2.84 (acid) 0.26 (base)	-5.04	454.5
Cefotaxime	Penicillin binding protein	-1.49	2.73 (acid) 3.58 (base)	-4.24	455.5
Ampicillin	Penicillin binding protein	-2	3.24 (acid) 7.23 (base)	-2.72	0.04
Sulfadiazine	Dihydropteroate synthetase	-0.39	6.99 (acid) 2.01 (base)	-0.33	8.91
Sulfamethazine	Dihydropteroate synthetase	0.65	6.99 (acid) 2.00 (base)	-0.06	4.72
Azithromycin	Bacterial ribosome	2.44	12.43 (acid) 9.57 (base)	-0.08	1810
Erythromycin	Bacterial ribosome	2.6	12.45 (acid) 9 (base)	1.55	43.3

281 Table 1 – Chemical properties of antibiotics.<sup>a</sup> according to drugbank ([www.drugbank.ca](http://www.drugbank.ca)).

282 <sup>b</sup> predicted by ChemAxon ([www.chemicalize.org](http://www.chemicalize.org))

## 283 2.4. Chemical analysis

284 The concentrations of antibiotics in the stocks and in three exposure replicates  
 285 for all concentrations and in each species at the end of the tests were measured  
 286 using liquid chromatography-mass spectrometry (method supplied in  
 287 Supplementary material A). Following the final cell density determination of the  
 288 assay, microplates were centrifuged at 4000 rpm for 30 minutes. 150µL of  
 289 supernatant was carefully removed and transferred to a deep well microplate  
 290 (96-well, 2ml; Porvair Sciences) with acetonitrile (50% volume). Where  
 291 necessary samples were further diluted to within the calibration range. All  
 292 chemical concentrations are reported as free acids and bases.

293 In the instances where analytical data was <LOQ or where an extraction error  
 294 occurred (see Supplementary material B and Table S.B1) these

295 samples/replicates were excluded from further analysis (detailed in Table S.B1)  
296 Limits of quantification (LOQ) for each antibiotic are given in Table S.B2.

## 297 **2.5. Measured environmental concentrations**

298 The MECs for each antibiotic were obtained from Umweltbundesamt's (UBA)  
299 'Pharmaceuticals in the environment' database (Umwelt bundesamt, 2018).  
300 MECs from all matrices that were measured in, or able to be converted into µg/L  
301 were extracted for use. Measurements of 0 µg/L were removed as they represent  
302 either the absence of the antibiotic or presence below the limit of detection,  
303 which make this analysis assume a worst-case scenario by moving the median to  
304 higher concentrations. MECs from matrixes such as inflows to WWTP, sewage  
305 sludge or untreated hospital and industrial effluents were also removed from the  
306 analysis to leave only environmentally relevant MECs.

## 307 **2.6. Statistical analysis**

### 308 **2.6.1. Growth rate calculations**

309 Growth rate of cyanobacteria was calculated according to equation below based  
310 on the phycocyanin fluorescence at the start and the end of the assay.

311

$$312 \text{ Growth Rate} = \frac{\ln X_j - \ln X_i}{t_j - t_i}$$

313 where

314  $X_i$  = cell density at time  $t_i$

315  $t_i$  =  $i$ 'th time point

316 **2.6.2. Dose-response modelling and EC<sub>x</sub> determination**

317 Dose-response curves were fitted in R (version 3.3.0; R Project for Statistical  
318 Computing, Vienna, Austria) using the drc package (Ritz *et al.*, 2015). For all  
319 pairs of bacterial species and antibiotics, growth rate data were fitted to log-  
320 logistic (3, 4 and 5 parameters) and Weibull distributions (4 and 5 parameters).  
321 Of these, the optimal distribution was selected based of the log-likelihood score  
322 to represent the data. From this fitted distribution estimates of the 10 and 50%  
323 effective concentrations (EC<sub>x</sub>) and associated confidence limits were determined.  
324 Data handling for the growth rate determinants for each species are provided in  
325 Supplementary material A.

326 **2.6.3. Species Sensitivity Distributions**

327 SSDs were constructed in R (version 3.3.0; R Project for Statistical Computing,  
328 Vienna, Austria) using the fitdistrplus package (Delignette-Muller and Dutang,  
329 2015) following procedure outlined in the MOSAIC SSD platform (Kon Kam King  
330 *et al.*, 2014). The 95% confidence intervals of the EC<sub>10</sub> for each species were used  
331 as interval-censored data (i.e. not a single fixed value but a range between the  
332 95% confidence limits). This allowed for the incorporation of the uncertainty  
333 around the EC<sub>10</sub> into the SSD and this increases confidence in the SSD output  
334 (Kon Kam King *et al.*, 2014). Six parametric distributions were fitted to the data:  
335 i) normal, ii) log-normal, iii) Weibull, iv) log-logistic, v) gamma and vi)  
336 exponential. The best fitting distribution was selected based upon a combination  
337 of the Akaike Information Criterion (AIC) score.

338 The HC<sub>5</sub> and associated confidence intervals were determined from  
339 bootstrapping of the data (5000 iterations) based on the parameters of the fitted



340 distribution. A similar protocol was followed to derive the SSD, HC5 and  
341 confidence intervals from the NOEC data but for this the NOEC values were used  
342 as non-censored data.

### 343 **3. Results**

#### 344 **3.1. Antibiotic exposure concentrations**

345 The measured concentrations of the antibiotics in each microplate assay,  
346 calculated using a geometric mean of the concentrations at the start (stocks) and  
347 end (exposure replicates) of the test, are provided in the Supplementary material  
348 B (figures S.B1 – S.B14). Overall concentrations of the antibiotics in the test  
349 media varied with losses due, in part, to the presence of the bacteria. These  
350 losses differed across the various antibiotics tested and species (graphs S.B15 –  
351 S.B21; determined as the difference between concentrations in the wells  
352 containing cyanobacteria and blank replicates (without cyanobacteria)).

353

354 For cefazolin, mean measured concentrations in the exposure replicates ranged  
355 between 14 to 32 % of the nominal concentrations (Fig S.B1). The greatest losses  
356 of cefazolin occurred in the exposures to *S. elongates* and *Synechococcus sp.*

357

358 Mean measured concentrations of cefotaxime in the exposure replicates ranged  
359 between 18 and 44% of nominal (Fig S.B3). The greatest reductions in the  
360 exposure replicates compared with replicates without cyanobacteria were for  
361 the *Synechococcus* genus (Fig S.B16).

362

363 Mean measured concentrations of ampicillin in the exposure replicates ranged  
364 between 44 and 95% of nominal (Fig S.B5). In the presence of the cyanobacteria  
365 there were generally between 10 and 30% additional reductions compared with  
366 the replicates without bacteria, but was most pronounced in the *A. cylindrical*  
367 exposure replicates (S.B17).

368

369 Mean measured concentrations of sulfadiazine in the exposure replicates were  
370 between 101 and 142% of nominal (Fig S.B7). The high measured concentrations  
371 of up to 142% of nominal occurred in the nominal 2.36, 145 and 1140 µg/L test  
372 concentrations and they would increase the uncertainty around toxicity  
373 estimates calculated. However, due to the lack of sensitivity of the cyanobacteria  
374 to sulfadiazine (see below) this doesn't affect any conclusions drawn. Reductions  
375 in sulfadiazine concentrations due to the presence of the cyanobacteria varied  
376 across tests concentrations (S.B18).

377

378 Mean measured concentrations of sulfamethazine in the exposure replicates  
379 ranged between 87 to and 134% of nominal (Fig S.B9). Extraction errors for  
380 nominal concentrations 907 and 1633 µg/L in the *S. elongates* exposure meant  
381 that these had to be excluded for the analyses.

382

383 Mean measured concentrations of erythromycin in the exposure replicates were  
384 between 71 and 100% of nominal (Fig S.B11) with exception of the nominal  
385 3.77 µg/L test concentration (53% of nominal). Erythromycin concentrations  
386 were lowered by up to 50% over the exposure period and the presence of the  
387 cyanobacteria in the exposure replicates caused additional erythromycin losses

388 of on average of 10 and 20% (but up to 60%) compared to replicates without  
389 cyanobacteria present (Fig S.B20).

390

391 Mean measured concentrations of azithromycin in the exposure replicates  
392 ranged between 23 and 79% of nominal (Fig S.B13). Azithromycin  
393 concentrations in the exposure and blank replicates at the end of the exposures  
394 were considerably lower, by up to 96%. The presence of all species of  
395 cyanobacteria had an effect of reducing the test concentrations further by  
396 between 10 and 15% (Fig S.B21).

### 397 **3.2. Growth inhibition, species sensitivity distributions and protection**

#### 398 **limit analysis:**

399 The dose-response curves for growth inhibition of the eight cyanobacteria for  
400 each antibiotic tested are presented in Figure 1. The EC10s, EC50s and NOECs for  
401 the experimental data are given in Table 2 (raw data are provided, and shown  
402 graphically in Supplementary material C, figures S.C1 – S.C7). All dose-response  
403 analyses are based upon geometric mean measured test concentrations. The pHs  
404 at the start and at the end of the tests are provided in Supplementary material D.

405

406 The data in Figure 2 presents the SSDs, based upon cyanobacteria EC<sub>10</sub>s for each  
407 antibiotic, together with PNECs based upon the NOEC of the most sensitive  
408 species tested (PNEC<sub>lowest</sub>) and the PNECs, based upon the two Organisation for  
409 Economic Co-operation and Development (OECD) test guideline recommended  
410 species (from which all PNECs derived for regulatory purposes are likely derived  
411 from) *A. flos-aquae* (PNEC<sub>A. flos-aquae</sub>) and *S. leopoldensis* (PNEC<sub>S.leopoldensis</sub>). SSDs

412 based upon cyanobacteria NOECs are provided in Supplementary material C  
413 (figure S.C8). It was not possible to establish the SSDs for sulfamethazine or for  
414 sulfadiazine as neither produced a full dose response curve from which to  
415 calculate an EC<sub>10</sub>.

416 The data in Table 2 provide values for the HC5, PNECs and the proportion of  
417 cyanobacteria affected at these concentrations, predicted from the SSD (based on  
418 the EC<sub>10s</sub>). Table 3 gives the highest and median MECs and the proportion of  
419 cyanobacteria affected at these concentrations predicted from the SSD (based on  
420 the EC<sub>10s</sub>). The same information as Tables 2 and 3 are provided in Tables S.C1  
421 and S.C2 but here using the SSD based upon NOEC data. Table SC.3 provides the  
422 best fitting distributions used for establishing the SSD.

423 EC<sub>10s</sub> for the different cyanobacteria exposure for cefazolin ranged between 2.4  
424 and 124 µg/L and the EC<sub>50s</sub> ranged between 4.1 to 283 µg/L (Figure 1 and Table  
425 1). Based upon both EC<sub>10</sub> and EC<sub>50</sub> *A. flos-aquae* and *G. herdmanii* were the most  
426 sensitive species to cefazolin. Species in the *Synechococcus* genera (*S. leopoliensis*,  
427 *S. elongates* and *Synechococcus sp.*) along with *Synechocystis sp.* were the least  
428 sensitive. *Synechococcus sp.* was up to 70 times less sensitive than the most  
429 sensitive species based on the EC<sub>50</sub>. The HC5 for cefazolin, based on EC<sub>10s</sub>, was  
430 1.13 µg/L, which was 7.5 times higher than the lowest PNEC (for *A. flos-aquae*)  
431 but 4 times lower than that based on *S. leopoldensis* (Figure 2 and Table 2). The  
432 predicted proportion of cyanobacteria affected at the PNECs ranged between  
433 0.95 and 13.3% depending on which species was used to derive the PNEC (Table  
434 2). The HC5 based on the NOEC data was 5 µg/L, 4 times higher than when based  
435 on the EC<sub>10</sub> (Table SC.1). The median MEC was predicted to affect a small fraction

436 of cyanobacteria (<1%) based on the SSD. The highest recorded MEC (42.9 µg/L;  
437 the maximum concentration observed in a range of effluents in Taiwan, including  
438 manufacturing and hospital effluents (Lin *et al.*, 2008)) was predicted to affect  
439 60.2% of cyanobacteria (Table 3) with the second highest MEC of 6.2 µg/L  
440 affecting 16.2% of cyanobacteria. The median MEC of 6 hospital effluents in the  
441 same study, of 6.2 µg/L (Lin *et al.*, 2008), would affect 17.3% of cyanobacteria  
442 based on the SSD.

443

444 EC<sub>10s</sub> for the different cyanobacteria exposure to cefotaxime ranged between 1.2  
445 and 39.8 µg/L and EC<sub>50s</sub> ranged between 2.2 and 98 µg/L (Figure 1 and Table 1).  
446 The maximum difference in sensitivity (45 times) occurred between *A. flos-aquae*  
447 (the most sensitive) and *Synechococcus sp* (the least sensitive). The four least  
448 sensitive species, *S. leopoliensis*, *Synechocystis sp.*, *S. elongates* and  
449 *Synechococcus sp.*, were also the least sensitive species to cefazolin, the other  
450 cephalosporin tested, with the same order of relative sensitivity. The HC5 for  
451 cefotaxime, based upon EC<sub>10s</sub>, was 0.67 µg/L, which was 4 times higher than the  
452 lowest PNEC (for *A. cylindrica*) and approximately the same value as for the  
453 PNEC based upon *S. leopoldensis* (Figure 2 and Table 2). The predicted  
454 proportion of cyanobacteria affected at the PNECs ranged between 1.3 and 5.2%  
455 depending on which species was used to derive the PNEC (Table 2). The HC5  
456 based upon the NOEC data was approximately the same as when based on the  
457 EC<sub>10</sub> (Table SC.1). The median MEC had little effect upon cyanobacteria based on  
458 the SSD. The highest recorded MEC (41.9 µg/L; the maximum concentration  
459 observed in a range of effluents in Taiwan, including manufacturing and hospital  
460 effluents (Lin *et al.*, 2008)) was predicted to affect 95.9% of cyanobacteria (Table

461 3). The median MEC of 6 hospital effluents in the same study, of 0.413 µg/L (Lin  
462 *et al.*, 2008), would affect 3.1% of cyanobacteria based on the SSD.

463

464 EC<sub>10</sub>s for the different cyanobacteria exposure to ampicillin ranged between 5.9  
465 and 44.6 µg/L and EC<sub>50</sub>s ranged between 8.4 and 81.4 µg/L (Figure 1 and Table  
466 1). Based on the EC<sub>50</sub>, there was a difference in sensitivity of approximately 10  
467 times (9.7) between the most sensitive (*C. gracile*) and least sensitive species  
468 (*A. cylindrical*). *C. gracile* was 3 times more sensitive than the next most sensitive  
469 species, *S. leopoliensis*. The remaining cyanobacteria all had similar sensitivities  
470 with EC<sub>50</sub>s of between 52 and 81.4 µg/L. The HC5 for ampicillin, based on EC<sub>10</sub>s,  
471 was 8.6 µg/L, which was 17.5 times higher than the lowest PNEC (for *C. gracile*)  
472 and 2.9 and 7.4 times higher than the PNECs based on *A. flos-aquae* and  
473 *S. leopoldensis*, respectively (Figure 2 and Table 2). The predicted proportion of  
474 cyanobacteria affected at the PNECs ranged between 0.9 and 1.6% depending on  
475 which species was used to derive the PNEC (Table 2). The HC5 based upon the  
476 NOEC data was approximately the same as those based on the EC<sub>10</sub> (Table SC.1).  
477 The median MEC indicated little effect upon cyanobacteria based on the SSD. The  
478 highest recorded MEC of 27.1 µg/L (WWTP effluent in India (Mutiyaar and Mittal,  
479 2013)) was predicted to affect 44.3% of the cyanobacteria (Table 3).

480

481 Exposure to sulfadiazine only caused partial inhibition of growth of the  
482 cyanobacteria tested (Figure 1). It was possible to fit log-logistic or Weibull  
483 distributions to the growth data but as growth inhibition ceased before the point  
484 of 50% growth inhibition EC<sub>10</sub> or EC<sub>50</sub> values (and therefore SSDs) could not be

485 calculated. The highest recorded MEC was 30.5 µg/L; treated WWTP effluent in  
486 east China (Chen *et al.*, 2012), whilst the median MEC was 0.019 µg/L.

487

488 As for sulfadiazine, sulfamethazine did not induce full growth inhibition for any  
489 of the cyanobacteria tested (Figure 1) preventing the ability to calculate EC<sub>10</sub> or  
490 EC<sub>50</sub> values (or SSDs). *C. gracile* was the most sensitive species to the growth  
491 inhibition effects of sulfamethazine (a 50% reduction in growth rate was  
492 observed at an exposure concentration of 1465 µg/L). At the highest tested  
493 exposure concentration (10,000 µg/L) there was between a 30% and 40%  
494 decrease in growth rate in *A. flos-aquae*, *A. cylindrical*, *S. leopoliensis*, *S. elongates*,  
495 *Synechococcus sp.*, and *G. herdmanii*. *Synechocystis sp* was far less affected with  
496 only a 4% inhibition of growth at the highest tested concentration. The highest  
497 recorded MEC was 25.4 µg/L; treated WWTP effluent in Korea (Sim *et al.*, 2011),  
498 whilst the median MEC was 0.015 µg/L.

499

500 EC<sub>10s</sub> for the different cyanobacteria exposure to erythromycin ranged between  
501 21.1 and 58.8 µg/L and the EC<sub>50s</sub> were between 43.4 and 135.1 µg/L (Figure 1  
502 and Table 1). Based upon the EC<sub>50</sub>, there was only a small interspecies difference  
503 in sensitivity; 3.1 times, between the most sensitive (*A. cylindrical*) and least  
504 sensitive species (*A. flos-aquae*). The HC5 for erythromycin, based upon EC<sub>10s</sub>,  
505 was 21.3 µg/L, which was 34.4 times higher than the lowest PNEC (for  
506 *S. elongatus*) and 7.3 and 6.9 times higher than the PNECs for *A. flos-aquae* and  
507 *S. leopoldensis*, respectively (Figure 2 and Table 2). The proportion of  
508 cyanobacteria affected at the PNECs was <1% for all PNECs irrespective of which  
509 species was used to derive it (Table 2). The HC5 based upon the NOEC data was

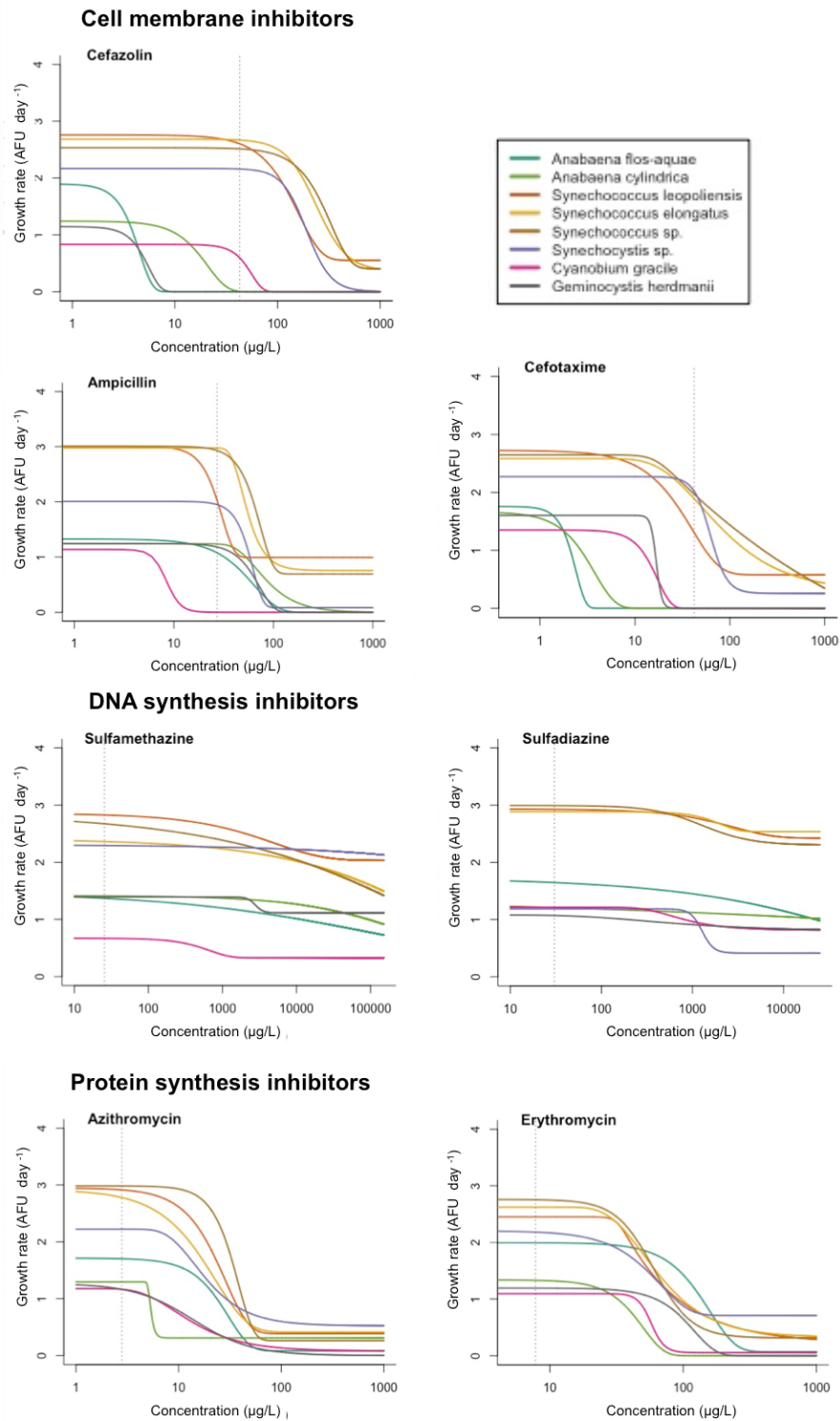
510 3.5 times lower than when based on the EC<sub>10</sub> (Table SC.2). No species of  
511 cyanobacteria are predicted to be affected by the MECs based on the SSD  
512 (highest MEC was 7.8 µg/L; untreated manufacturing discharge in China (Lin and  
513 Tsai, 2009)) (Table 3). The HC5 in this study was 107 times higher (HC<sub>52.5</sub> was  
514 81 times higher) than the PNEC in the European Unions watch list of priority  
515 substances for erythromycin is 0.2 µg/L (Loos *et al.*, 2018), but a PNEC based  
516 upon the lowest NOEC, based on *S. elongates*, would have been only <3 times  
517 higher (NOEC <0.62 µg/L).

518

519 EC<sub>10</sub>s for the different cyanobacteria exposure to azithromycin ranged between  
520 3.2 and 17.7 µg/L and EC<sub>50</sub>s ranged between 5.4 and 33.8 µg/L (Figure 1 and  
521 Table 1). Based upon the EC<sub>50</sub>, there was difference in sensitivity of 6.3 times  
522 only between the most sensitive (*A. cylindrical*) and least sensitive species  
523 (*Synechococcus sp.*). The HC5 for azithromycin, based on EC<sub>10</sub>s, was 3.2 µg/L,  
524 which was 21 times higher than the lowest PNEC (for *G. herdmanii*) and 3.1 and  
525 16.6 times higher than the PNECs for *A. flos-aquae* and *S. leopoldensis*,  
526 respectively (Figure 2 and Table 2). The predicted proportion of cyanobacteria  
527 affected at the PNECs was <1% for all PNECs irrespective of which species was  
528 used to derive it (Table 2). The HC5 based upon the NOEC data was  
529 approximately half as much as when based on the EC<sub>10</sub> (Table SC.2). The median  
530 MEC had no effect upon cyanobacteria based on the SSD, whilst the highest  
531 recorded MEC of 2.8 µg/L (from a WWTP in Las Vegas; (Jones-Lepp *et al.*, 2012))  
532 was predicted to affect 3% of cyanobacteria (Table 3). The HC5 in this study was  
533 166 times higher (HC<sub>52.5</sub> was 111 times higher) than the PNEC in the European  
534 Unions watch list of priority substances for azithromycin, 0.019 µg/L (Loos *et al.*,



535 2018), but a PNEC based upon the lowest NOEC, based on *G. herdmenii*, would  
536 have been only <8 times higher (NOEC = 0.15 µg/L).



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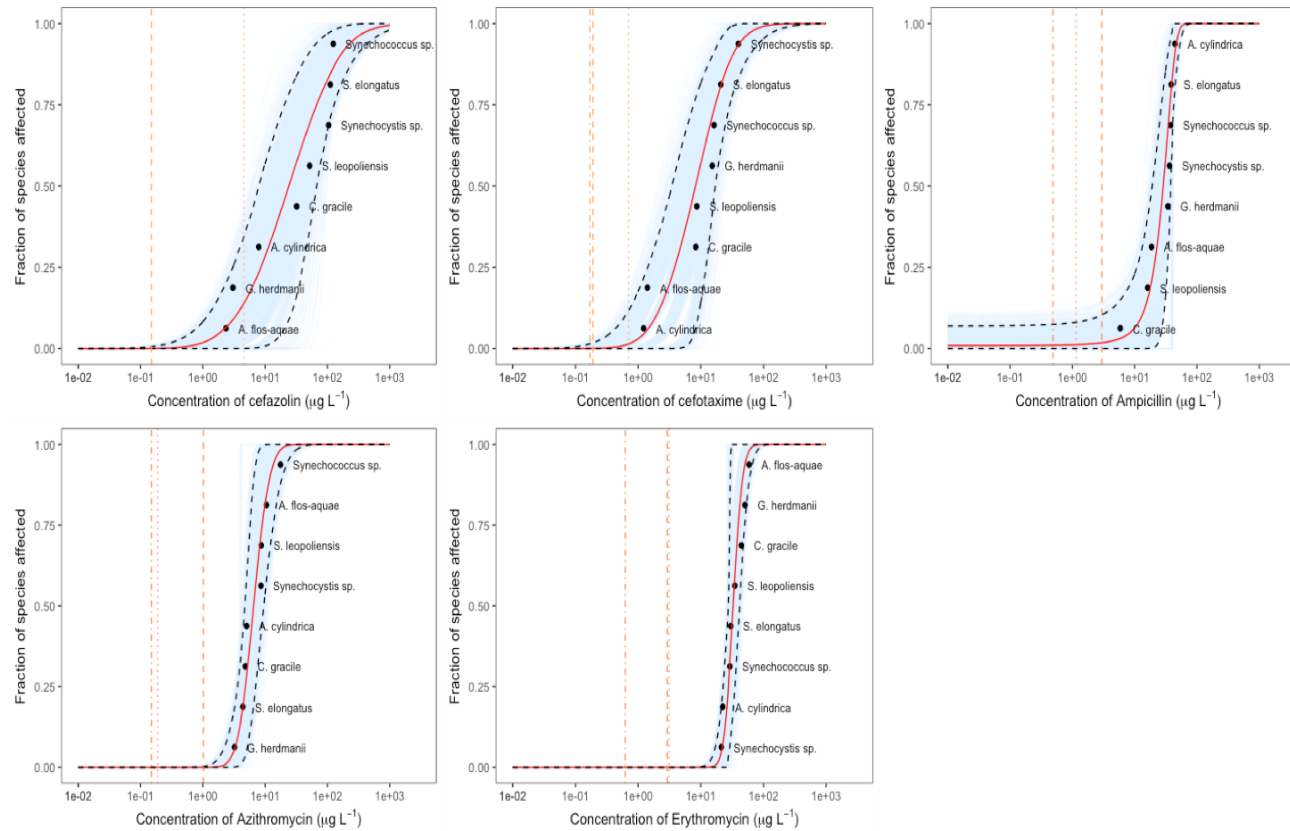
Figure 1 – Fitted concentration - response curves showing the effects of antibiotics on the growth rate of cyanobacteria. Curves are based upon 10 exposure concentrations. Antibiotics are arranged (vertical panels) according to their mode of action. Red dotted line indicates the highest measured environmental concentration (MEC) in UBA database (Umwelt bundesamt, 2018). Raw data plots are presented in Supplementary material C. In some cases the number of concentrations tested falling on the slope of the dose response curve may be low (< 3) and this may influence the confidence (robustness) of the toxicity estimation.

Antibiotic	Species	EC <sub>10</sub> estimate (µg/L)	EC <sub>10</sub> Low CL (µg/L)	EC <sub>10</sub> High CL (µg/L)	EC <sub>50</sub> estimate (µg/L)	EC <sub>50</sub> Low CL (µg/L)	EC <sub>50</sub> High CL (µg/L)	NOEC (µg/L)	Difference in sensitivity <sup>a</sup>
Cefazolin	<i>A. flos-aquae</i>	2.4	1.7	3.0	4.1	3.7	4.5	1.5	70
	<i>A. cylindrical</i>	7.9	2.9	12.8	17.8	15.4	20.2	6.4	
	<i>C. gracile</i>	32.2	24.8	39.5	51.3	47.5	55.1	44.0	
	<i>G. herdmanii</i>	3.1	2.6	3.5	5.1	4.8	5.3	4.5	
	<i>S. elongates</i>	111.3	97.3	125.3	238.0	217.6	258.3	66.4	
	<i>S. leopoliensis</i>	51.6	41.4	61.9	134.1	122.5	145.6	45.3	
	<i>Synechococcus sp</i>	124.1	101.5	146.8	283.2	263.6	302.8	93.4	
<i>Synechocystis sp</i>	104.5	80.9	128.1	191.3	170.0	212.5	157.0		
Cefotaxime	<i>A. flos-aquae</i>	1.4	1.0	1.8	2.2	2.0	2.4	1.9	45
	<i>A. cylindrical</i>	1.2	0.3	2.2	3.1	2.2	4.1	1.7	
	<i>C. gracile</i>	8.3	7.5	9.2	15.4	14.8	16.0	9.6	
	<i>G. herdmanii</i>	15.1	8.9	21.4	17.7	14.7	20.6	9.9	
	<i>S. elongates</i>	20.8	16.2	25.4	75.4	56.3	94.4	12.7	
	<i>S. leopoliensis</i>	8.7	7.0	10.3	31.0	28.7	33.3	7.0	
	<i>Synechococcus sp</i>	16.2	11.5	20.8	97.9	74.2	121.6	12.1	
<i>Synechocystis sp</i>	39.8	28.3	51.3	62.3	53.7	71.0	46.3		
Ampicillin	<i>A. flos-aquae</i>	18.7	11.6	25.9	52.4	45.2	59.7	30.2	9.7
	<i>A. cylindrical</i>	44.6	40.0	49.3	81.4	73.5	89.2	37.1	
	<i>C. gracile</i>	5.9	5.1	6.7	8.4	7.4	9.4	4.9	
	<i>G. herdmanii</i>	34.3	27.2	41.4	64.4	60.5	68.3	12.2	
	<i>S. elongates</i>	38.8	35.0	42.7	54.0	50.4	57.6	36.4	

Antibiotic	Species	EC <sub>10</sub> estimate (µg/L)	EC <sub>10</sub> Low CL (µg/L)	EC <sub>10</sub> High CL (µg/L)	EC <sub>50</sub> estimate (µg/L)	EC <sub>50</sub> Low CL (µg/L)	EC <sub>50</sub> High CL (µg/L)	NOEC (µg/L)	Difference in sensitivity <sup>a</sup>
	<i>S. leopoliensis</i>	16.2	11.8	20.6	27.5	25.1	29.9	11.5	
	<i>Synechococcus sp</i>	38.0	30.1	45.9	66.6	63.0	70.1	31.5	
	<i>Synechocystis sp</i>	36.5	25.8	47.2	57.1	50.7	63.5	34.2	
Sufadiazine	<i>A. flos-aquae</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<i>A. cylindrical</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>C. gracile</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>G. herdmannii</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>S. elongates</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>S. leopoliensis</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>Synechococcus sp</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<i>Synechocystis sp</i>	N/A	N/A	N/A	1275	1058	1493	380		
Sulfamethazine	<i>A. flos-aquae</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<i>A. cylindrical</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>C. gracile</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>G. herdmannii</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>S. elongates</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>S. leopoliensis</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	<i>Synechococcus sp</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<i>Synechocystis sp</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Azithromycin	<i>A. flos-aquae</i>	10.5	7.1	14.0	25.8	22.4	29.3	10.2	6.3
	<i>A. cylindrical</i>	5.0	3.8	6.2	5.4	0.6	10.1	4.9	
	<i>C. gracile</i>	4.8	3.8	5.7	12.5	10.3	14.6	9.5	

Antibiotic	Species	EC <sub>10</sub> estimate (µg/L)	EC <sub>10</sub> Low CL (µg/L)	EC <sub>10</sub> High CL (µg/L)	EC <sub>50</sub> estimate (µg/L)	EC <sub>50</sub> Low CL (µg/L)	EC <sub>50</sub> High CL (µg/L)	NOEC (µg/L)	Difference in sensitivity <sup>a</sup>
	<i>G. herdmanii</i>	3.2	2.2	4.3	13.8	11.8	15.8	1.5	
	<i>S. elongates</i>	4.4	2.7	6.0	17.4	14.9	19.9	3.3	
	<i>S. leopoliensis</i>	8.7	6.7	10.6	23.5	21.6	25.4	1.9	
	<i>Synechococcus sp</i>	17.7	13.5	21.9	33.8	31.5	36.1	2.6	
	<i>Synechocystis sp</i>	8.6	5.7	11.4	18.1	12.9	23.4	9.6	
Erythromycin	<i>A. flos-aquae</i>	58.8	41.5	76.1	135.1	121.9	148.3	28.8	3.1
	<i>A. cylindrical</i>	22.3	16.5	28.2	43.9	40.2	47.6	12.2	
	<i>C. gracile</i>	44.5	15.5	73.5	57.3	56.0	58.6	31.2	
	<i>G. herdmanii</i>	50.7	42.6	58.7	104.8	98.1	111.5	11.5	
	<i>S. elongates</i>	30.1	26.4	33.9	63.3	57.7	68.9	<6.2	
	<i>S. leopoliensis</i>	35.0	28.6	41.3	63.9	53.6	74.1	31	
	<i>Synechococcus sp</i>	29.1	23.8	34.4	59.8	55.6	64.0	13.4	
	<i>Synechocystis sp</i>	21.2	12.3	30.1	55.7	49.5	61.8	<7.2	

546 Table 2 – Antibiotic 10% and 50% effective concentrations (EC<sub>x</sub>) and no observed effect concentrations (NOEC) for growth inhibition of eight cyanobacteria  
547 species. All concentrations are reported in µg/L. CL = Confidence Limit. <sup>a</sup> Times difference calculated by largest EC<sub>x</sub>/smallest EC<sub>x</sub> – reported value is based on  
548 largest range of EC<sub>10</sub> and EC<sub>50</sub>. Mode of Actions: cefazolin , cefotaxime amd ampicillin are cell membrane synthesis inhibitors; sufadiazine and sulfamethazine are  
549 DNA synthesis inhibitors (Anti-folates); Azithromycin and Erythromycin are Protein synthesis inhibitors.



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Figure 2. Species sensitivity distributions of cyanobacteria exposed to five antibiotics; cefazolin and cefotaxime (cephalosporins), ampicillin (penicillin), azithromycin and erythromycin (macrolides). Red line indicates the modelled species sensitivity distribution. Dashed black lines represent upper and lower 95% confidence limits. Blue shaded area indicates results of bootstrapped distributions. Orange coloured vertical lines indicate predicted no effect concentrations (PNEC): Dot-dash orange line= PNEC<sub>lowest</sub>; Dashed orange line = PNEC<sub>A. flos-aquae</sub>; Dotted orange line = PNEC<sub>S. leopoldensis</sub>.

Antibiotic	Protection limit	Concentration (µg/L)	Lower 95% CI	Higher 95% CI	Proportion of cyanobacteria affected (%)
Cefazolin	HC5	1.13	0.13	19.88	5
	PNEC <sub>Lowest</sub>	0.15	-	-	0.95
	PNEC <sub>A. flos-aquae</sub>	0.15	-	-	0.95
	PNEC <sub>S. leopoldensis</sub>	4.53	-	-	13.26
Cefotaxime	HC5	0.67	0.32	1.13	5
	PNEC <sub>Lowest</sub>	0.17	-	-	1.29
	PNEC <sub>A. flos-aquae</sub>	0.19	-	-	1.44
	PNEC <sub>S. leopoldensis</sub>	0.7	-	-	5.2
Ampicillin	HC5	8.56	0**	26.47	5
	PNEC <sub>Lowest</sub>	0.49	-	-	0.91
	PNEC <sub>A. flos-aquae</sub>	3	-	-	1.56
	PNEC <sub>S. leopoldensis</sub>	1.15	-	-	1.05
Erythromycin	HC5	21.3	16.18	28.76	5
	PNEC <sub>Lowest</sub>	0.62 *	-	-	0
	PNEC <sub>A. flos-aquae</sub>	2.9	-	-	0
	PNEC <sub>S. leopoldensis</sub>	3.1	-	-	0
Azithromycin	HC5	3.15	2.11	5.03	5
	PNEC <sub>Lowest</sub>	0.15 *	-	-	0
	PNEC <sub>A. flos-aquae</sub>	1.02	-	-	0
	PNEC <sub>S. leopoldensis</sub>	0.19	-	-	0

555 Table 2. Protection limits; 5% hazardous concentration (HC5) based upon a species sensitivity  
556 distribution (SSD) using 10% effective concentrations (EC<sub>10</sub>), predicted no effect concentrations  
557 (PNECs) and the proportion of cyanobacteria affected based upon the SSD. PNECs determined as  
558 specified in current environmental risk assessment. PNEC<sub>Lowest</sub> represents the PNEC based on the  
559 most sensitive cyanobacteria in the conducted assays. PNEC<sub>A. flos-aquae</sub> and PNEC<sub>S. leopoldensis</sub> are  
560 based on the data of species recommended in the OECD 201 test guideline (OECD, 2011).  
561 \* PNEC<sub>Lowest</sub> for erythromycin is < 0.62 and < 0.15 for azithromycin. \*\* CI was determined to be  
562 <0.

Antibiotic	Measured concentration	Concentration ( $\mu\text{g/L}$ )	Proportion of cyanobacteria affected (%)
Cefazolin	Median	0.15 (10)	0.95
	Highest	42.9 (Lin <i>et al.</i> , 2008)	60
Cefotaxime	Median	0.033 (16)	0.25
	Highest	41.9 (Lin <i>et al.</i> , 2008)	96
Ampicillin	Median	0.021 (15)	0.85
	Highest	27.1 (Mutiyar and Mittal, 2013)	44
Erythromycin	Median	0.050 (533)	0
	Highest	7.8 (Lin and Tsai, 2009)	0
Azithromycin	Median	0.054 (255)	0
	Highest	2.8 (Jones-Lepp <i>et al.</i> , 2012)	3

564 Table 3. Proportion (%) of cyanobacteria affected at median and highest measured environmental  
565 concentrations (MECs) based on the cyanobacteria species sensitivity distributions using 10%  
566 effective concentrations and MECs obtained from Umweltbundesamt's 'Pharmaceuticals in the  
567 environment' database (Umwelt bundesamt, 2018). Bracketed numbers indicate number of MECs  
568 in median calculation.

## 569 4. Discussion

570 We show that for eight species of cyanobacteria the sensitivity for growth  
571 inhibition for antibiotic exposure can vary widely and is influenced by the  
572 antibiotic MoA. For the  $\beta$ -lactam antibiotics in particular, the interspecies  
573 sensitivity varied by up to 70 times, far exceeding the AF of 10 currently applied  
574 to the NOEC to establish the PNEC in ERA (based on a single species of  
575 cyanobacteria). The SSD analysis indicated however that the current regulatory  
576 approach to ERA in Europe was generally protective of >98% of cyanobacteria  
577 populations when the reference test species employed for this was *A. flos-aque*.  
578 In contrast, the PNECs derived for cefazolin and cefotaxime when testing was  
579 based upon *S. leopoldensis* (another OECD recommended species) would result in  
580 growth inhibition for 13% and 5% of the tested cyanobacteria, respectively. In



581 the case of macrolides, the SSDs showed that an AF of 10 might be at a level that  
582 is suitable for the adequate population protection of cyanobacteria. We show  
583 that in some of the more polluted environments with antibiotics, based on the  
584 highest published MECs in the literature, up to 60% of cyanobacteria populations  
585 may be affected in these specific environments.

#### 586 **4.1. Chemical analysis, fate and behavior in the cultures**

587 Our analytical results showed considerable variation in the fate of the antibiotics  
588 in our assays. Generally speaking, reductions in the measured concentrations  
589 over the exposure period were high for the  $\beta$ -lactams, likely due to  
590 photodegradation (Wang and Lin, 2012 {Arsand, 2018 #177}), and for  
591 azithromycin possibly due to adsorption to the culture vessel materials and  
592 cellular or extracellular matter given its high partition-coefficient (LogP, 4.02)  
593 and adsorption coefficient ( $K_d$ , 3100) (National Center for Biotechnology  
594 Information, 2018). Erythromycin and the sulfonamides were more stable in the  
595 assay system.

596

597 Generally, the presence of the cyanobacteria resulted in a reduced amount of  
598 antibiotic in the culture medium (measured at the end of the exposure) likely as  
599 a consequence of adsorption and/or uptake into the bacterial cells and/or  
600 biodegradation by the cyanobacteria. Biodegradation is considered the most  
601 likely factor influencing the measured levels between the species studied for any  
602 one antibiotic, particularly notable in the  $\beta$ -lactams, as differences in surface  
603 binding of the antibiotic alone are very unlikely to account for this variation.

604 Further discussion on the fate of the antibiotics tested in the assays can be found  
605 in Supplementary material B.

#### 606 **4.2. Cyanobacteria sensitivity**

607 ***β-lactams***: There was a major difference (up to 70 times) in sensitivity to  $\beta$ -  
608 lactams (and in particular the cephalosporins) between the different species of  
609 cyanobacteria in our study. The reason for this is unknown but it may reflect  
610 differences in uptake rates caused by the quantity and type of porins in the outer  
611 membrane (Li *et al.*, 2015; Sugawara *et al.*, 2016). The bilayered outer  
612 membrane of cyanobacteria (and Gram-negative bacteria) is comprised of a  
613 hydrophobic lipopolysaccharide and acts as an effective barrier to most drugs.  
614 Antibiotics must therefore permeate through the membrane or use porin  
615 channels to enter the periplasm. Porins tend to let small and non-lipophilic  
616 molecules pass through with ease, which includes the  $\beta$ -lactams (as well as  
617 fluoroquinolones, tetracycline, chloramphenicol, cycloserine, and  
618 aminoglycosides antibiotics) (Delcour, 2009; Li *et al.*, 2015). For the relatively  
619 small molecules of cefazolin and ampicillin, we might thus expect that porin  
620 channels to be the uptake main route. For the larger antibiotic cefotaxime  
621 however, diffusion through the outer membrane may be more important in  
622 cellular uptake as it may be too large to easily pass through porins. Indeed, the  
623 susceptibility of the Gram-negative bacteria, *K. pneumonia*, was 4-8 times higher  
624 to cefotaxime when the strain expressed a larger porin channel (García-Sureda *et*  
625 *al.*, 2011).

626

627 Porins differ between bacterial clades and cyanobacteria specifically do not  
628 appear to have the same porin families as those typically found in other bacteria  
629 (Flores *et al.*, 2006). Gram-negative bacteria, for example, generally have smaller  
630 outer membrane porins but with higher channel conductance than cyanobacteria  
631 allowing more molecules to enter into the cell (Hoiczyk and Hansel, 2000). It is  
632 hypothesised that, as autotrophs, cyanobacteria synthesise the large organic  
633 molecules they require (Hoiczyk and Hansel, 2000; Kowata *et al.*, 2017), whilst  
634 non-autotrophic bacteria need to uptake more (and larger) molecule types from  
635 outside of the cell. It is therefore reasonable to hypothesise that cyanobacteria  
636 may not be as susceptible as Gram-negative bacteria to larger antibiotics that  
637 require larger porin channels. Since ERA only uses one species of cyanobacteria  
638 to represent all primary producer diversity, if sensitivity is, at least in part,  
639 driven by uptake due to their outer membrane porins, other bacterial clades  
640 such as Gram-negative bacteria that differ in their membrane structure and  
641 porins may not be well represented.

642

643 In addition to uptake, efflux and  $\beta$ -lactamase enzymes may have key roles in  
644 determining the sensitivity of bacteria to antibiotics. Efflux rates of the  
645 antibiotics in cyanobacteria studied are not known and thus conclusions cannot  
646 be drawn, but our data do indicate the possibility of biodegradation for all the  $\beta$ -  
647 lactams tested. For cefazolin this (potential) biodegradation was greatest for  
648 *S. elongates* and *Synechococcus sp.*, which were also the least sensitive species  
649 tested based on growth inhibition. This is in accordance with findings that the  
650 Gram-negative *Enterobacteriaceae* family showed interspecies variability in  
651 sensitivity to  $\beta$ -lactams, ranging by between one and two orders of magnitude,

652 which were attributed to differences in chromosomal  $\beta$ -lactamases (Stock,  
653 2005).

654

655 ***Sulphonamides:*** Growth inhibition of cyanobacteria following exposure to  
656 sulfonamides was generally limited and in some species the inhibitory effect  
657 plateaued with increasing antibiotic concentration, which may suggest the  
658 initiation of a possible resistance mechanism. The results are in accordance with  
659 a recent meta-analysis where cyanobacteria were found to be less sensitive to  
660 sulfonamides compared to microalgae and macrophytes (Le Page *et al.*, 2017). A  
661 possible explanation for their insensitivity could be that cyanobacteria contain a  
662 protein (*slr0642* identified in *Synechocystis*) that may act as a folate transporter  
663 and which allows the uptake of folates from the environment. This in turn  
664 overcomes the effect of the targeting of this drug on the folate synthesis pathway  
665 (de Crécy-Lagard *et al.*, 2007; Klaus *et al.*, 2005). It should be highlighted that the  
666 growth rate was lower than the controls and thus there appears to be some  
667 fitness consequence to this resistance mechanism.

668

669 ***Macrolides:*** Responses to the macrolides were more consistent across the  
670 cyanobacteria compared with the  $\beta$ -lactam antibiotics; the EC10s and EC50s for  
671 the eight species differed by less than an order of magnitude. Uptake and efflux  
672 may also influence the differences in cyanobacteria sensitivity to macrolides.  
673 Indeed, (Stock, 2005) hypothesized that Gram-negative bacteria species specific  
674 differences are, at least in part, driven by differences in outer membrane  
675 hydrophobicity. Due to macrolides large size, uptake is generally thought to be  
676 restricted by the outer membrane (Delcour, 2009; Stock, 2005), although there is

677 some evidence that porin-like uptake may be present (Hahn *et al.*, 2012).  
678 Azithromycin is dicationic and less hydrophobic than erythromycin and may  
679 therefore pass through the outer membrane more easily (Farmer *et al.*, 1992;  
680 Stock, 2005).

681

682 The similar levels of efficacy of the macrolides across the different cyanobacteria  
683 species may, in part, be explained by the highly conserved ribosome drug target  
684 (Lecompte *et al.*, 2002; Yutin *et al.*, 2012). R-proteins however, which make up  
685 the ribosome, do vary between broader bacterial taxonomic clades and because  
686 the MoA of macrolide antibiotics is highly dependent on the positioning and  
687 interaction with the ribosome, differences in r-proteins between bacterial taxa  
688 could feasibly affect antibiotic efficacy/action. Based on the literature, therefore,  
689 the differences in cyanobacterial sensitivity to macrolides are more likely to  
690 driven by differences in uptake or efflux than differences in the drug target given  
691 that their ribosomes are likely evolutionarily well conserved. In addition to  
692 decreased uptake/increased efflux, other mechanisms of resistance to  
693 macrolides in Gram-negative bacteria comprise target mutations, methylation,  
694 pseudouridylation and modification of the macrolide (Gomes *et al.*, 2017), but  
695 such resistance mechanisms have not yet been considered in cyanobacteria.

696

697 In our assays azithromycin had a greater potency than erythromycin across all  
698 cyanobacteria species. Interestingly, azithromycin is reported to have modes of  
699 action in addition to the ribosomal drug target that may help to explain this  
700 enhanced potency. It is dicationic and it may disrupt the outer bacterial  
701 membrane through the displacement of divalent cations from their binding sites

702 on adjacent lipopolysaccharide molecules in Gram-negative bacteria (Farmer *et*  
703 *al.*, 1992; Imamura *et al.*, 2005).

#### 704 **4.3. Sensitivity comparisons with other bacteria**

705 Due to the limited data available for environmental bacteria we have compared  
706 the MIC for clinically relevant bacteria with the data obtained in our assays, but  
707 these values represent different parts of the dose-response curve (the MIC  
708 represents the concentration with complete inhibition and the EC<sub>10</sub> the  
709 concentration that inhibits growth rate by 10%) (Bengtsson-Palme and Larsson,  
710 2018; Le Page *et al.*, 2018). Additionally, the EUCAST data is not based on  
711 measured concentrations and since the tests are conducted in the dark, we might  
712 thus expect less degradation via photolysis than observed in our assays.

713

714 When comparing the effects of  $\beta$ -lactams in this study with the MICs of clinically  
715 relevant bacteria in the EUCAST database, the most sensitive cyanobacteria in  
716 our study were 3-6 times more sensitive to ceftazidime. In accordance with our  
717 hypothesis above that cyanobacteria may be less sensitive to the larger  
718 antibiotics as they do not have porins that enable their uptake, several of the  
719 clinically relevant bacteria appeared to be more sensitive to cefotaxime than  
720 cyanobacteria (EUCAST). The effects of ampicillin on the cyanobacteria were  
721 similar to those observed on cyanobacteria by (Ando *et al.*, 2007) and within the  
722 ranges seen in clinically relevant bacteria in the EUCAST database (EUCAST).

723

724 There are limited published data available for sulfadiazine and sulfamethazine.  
725 They are both veterinary antibiotics and so neither have EUCAST data and their

726 ecotoxicological profiles are rather poorly understood. Investigators have found  
727 however that the MICs for sulfamethazine tend to be relatively high (>512 mg/L  
728 for both Gram-negative and Gram positive bacterial strains) compared with  
729 other antibiotics (Salmon and Watts, 2000; Salmon *et al.*, 1995).

730

731 Data on azithromycin is limited for ecotoxicologically relevant species but our  
732 results are in accordance with those reported in (Vestel *et al.*, 2015) where  
733 cyanobacteria (species not provided) had a EC<sub>50</sub> of 1.8 µg/L. The MICs of  
734 clinically relevant bacteria in the EUCAST database suggest that growth in the  
735 most sensitive bacteria is inhibited completely at 16 µg/L, which is consistent  
736 with that for the more sensitive cyanobacteria in this study. For erythromycin,  
737 EC<sub>50</sub>s were generally similar to those obtained for eight species of cyanobacteria  
738 by (Ando *et al.*, 2007). They similarly found, *A. cylindrical*, to be the most  
739 sensitive species but calculated the EC<sub>50</sub>s to be over an order of magnitude lower  
740 than in this study (3.5 compared to 44 µg/L respectively), albeit their tests  
741 exposure period was twice that of in this study (6 days) (Ando *et al.*, 2007)). The  
742 most sensitive clinically relevant bacteria to erythromycin in the EUCAST  
743 database have MICs from 8 µg/L (EUCAST), suggesting that for this antibiotic  
744 that clinically relevant bacteria may be more sensitive than cyanobacteria.

#### 745 **4.4. Implications for ERA**

##### 746 **4.4.1. PNECs with an assessment factor of 10 are not always protective**

747 Our data suggest that for the β-lactams, depending on which species the PNEC  
748 was derived from, protection of >95% of cyanobacteria species was not be  
749 predicted by our SSDs, even with an assessment factor of 10 applied to account

750 for such interspecies sensitivity differences. For the two macrolides however, the  
751 PNEC was protective of all cyanobacteria regardless of the species from which  
752 the PNEC was derived. These data indicate that under current ERA procedures  
753 (of using a single test species) the choice of species is critical in establishing a  
754 protection limit and the MoA can be an important factor in this consideration.

755 The large interspecies variability observed between cyanobacteria exposed to  
756 cell membrane synthesis inhibitors causes the PNEC to have a higher probability  
757 of being under protective because the assessment factor of 10 is likely  
758 inadequate as highlighted in our previous meta-analysis (Le Page *et al.*, 2017).  
759 For other MoAs, such as the macrolides, the smaller interspecies variability  
760 means an assessment factor of 10 is sufficient to cover the entire SSD no matter  
761 which species is selected on which to base the PNEC.

762 The limited sensitivity of cyanobacteria to sulfonamide antibiotics confirmed the  
763 findings from the previous meta-analysis (Le Page *et al.*, 2017) expressing  
764 concern that cyanobacteria may not be suitable for the estimation of  
765 environmental protection limits. Furthermore, in some cases microalgae and  
766 macrophytes may be more sensitive than cyanobacteria to this class of  
767 antibiotics (Le Page *et al.*, 2017) but under current ERA framework for  
768 pharmaceuticals neither microalgae nor macrophytes would be tested, although  
769 the revised ERA currently under consultation for the European Medicine Agency  
770 does require a microalgae in addition to two cyanobacteria species and an  
771 invertebrate (EMA, 2018).

772



#### 4.4.2. The HC5 may provide a better protection limit than the traditional

#### PNEC

Results from this analysis suggest that an approach using a SSD with eight cyanobacteria to derive an HC5 or HC5<sub>(2.5)</sub> with a small assessment factor (of less than 10) may be more suitable for the determination of protection limits for cyanobacteria populations than the traditional PNEC. But additional testing on other bacterial classes is required to ensure protection of bacteria more generally. We emphasise that a PNEC based on the NOEC and AF of 10 was generally adequately protective providing the species on which it was based was sensitive. If we consider the two species recommended in the OECD 201 test guideline, a PNEC based upon *A. flos-aquae* was protective but a PNEC based upon *S. leopoldensis* was under protective for both cefazolin and cefotaxime. Furthermore, for some MoAs such as sulphonamides, its possible that a PNEC using an AF of 10 will be under protective of bacteria more generally regardless of which cyanobacteria species is used.

For the cephalosporins, the HC5 was generally 4 - 8 times higher than the PNEC<sub>lowest</sub> but the HC5<sub>(2.5%)</sub> was more similar at 0.9 - 2 times higher. For the macrolides the HC5 far exceeded this and was up to 34 times higher than the PNEC<sub>lowest</sub>, further highlighting how the PNEC and assessment factor of 10 might be highly conservative as a protective factor for this antibiotic class/MoA. These results therefore support the suggestion that the HC5<sub>(2.5%)</sub> could be used to ensure an empirically based protection limit that is a more accurate and is protective of 95% of cyanobacteria (Wheeler *et al.*, 2002) without being over protective in for some MoAs as appears to be the case for the PNECs for

797 macrolides. The HC5 95% confidence intervals suggest some uncertainty  
798 (although this is relatively small) but given that these estimates incorporate the  
799 error around the original EC<sub>10</sub>s via the use of the 95% confidence limits as  
800 censored data, this might be expected. The wider HC5 95% confidence limits for  
801 cefazolin may be due to higher variability observed between replicates in the  
802 microplate assay.

803 The HC5 has been suggested as a protection limit under the premise that  
804 functional redundancy (where multiple species are capable of performing the  
805 same ecological functions) in the ecosystem will compensate for some small  
806 effects on the most sensitive species (Solomon and Sibley, 2002). However, the  
807 magnitude of functional redundancy is not clear, especially in bacterial  
808 communities (Antwis *et al.*, 2017). Further investigation is required to explore  
809 the hypothesis that 5% of species can be affected beyond their EC<sub>10</sub> without  
810 adverse effects upon environmental communities and ecosystem function. Such  
811 studies are best undertaken using semi-field test designs, as conducted, for  
812 example, by (Rico *et al.*, 2014). These authors found disruptions to the nitrogen  
813 cycle occurred in mesocosms exposed to enrofloxacin that resulted from reduced  
814 numbers of ammonia-oxidising bacteria and archaea leading to higher ammonia  
815 and lower nitrate concentrations. In order to better estimate the effects of  
816 antibiotics on ecosystem functioning, additional endpoints that better represent  
817 functions of interest might usefully be included, for example oxygen evolution  
818 (as a proxy for photosynthetic rate) and pigment content (Guo *et al.*, 2016b).

819 The selection of species for use in an SSD is important (Verdonck *et al.*, 2003).  
820 Our analysis reflects only cyanobacteria sensitivity, and even here we studied

821 only a small selection of classes of cyanobacteria that grew adequately in the  
822 assay method adopted. Thus, a more diverse range of bacteria should be  
823 included since sensitivity differences between taxonomic clades could be large,  
824 even spanning several orders of magnitude. Furthermore, it should be  
825 emphasised that non-bacterial taxa including certain macrophytes (Le Page et al.,  
826 2017) and diatoms (Guo et al., 2016a) have been shown to be more sensitive to  
827 some antibiotics (e.g. sulphonamides and trimethoprim) than cyanobacteria. It is  
828 likely that some other bacterial taxa (i.e. not cyanobacteria) could be equally or  
829 more sensitive than all eukaryotes and thus it should be possible to select an  
830 appropriate diversity of bacteria for ERA testing of antibiotics that provide  
831 appropriate limits for the protection of all prokaryotes and eukaryotes.

832 A protection limit also needs to consider the extrapolation from the laboratory to  
833 the field. Previous authors have concluded that large safety factors are not  
834 considered necessary for extrapolation between the laboratory and field  
835 (Chapman *et al.*, 1998). Indeed, biofilms in the field may provide resilience to  
836 chemical toxicity due to the protective nature of complex biofilm communities  
837 and extracellular substances (Harrison *et al.*, 2007) and interspecies competition  
838 for resources may lower sensitivity to chemical contaminants (Rico et al., 2018).  
839 On the other hand, environmental conditions could significantly increase the  
840 sensitivity of bacteria to antibiotics due to chemical mixtures or as a result of  
841 different biotic and abiotic factors (e.g. competition, predation, temperature, pH  
842 (Rohr *et al.*, 2016)). As such, in the absence of conclusive evidence  
843 demonstrating the safe concentrations in mixtures or in a variety of  
844 environmental conditions, it may be prudent to take a protective approach and

845 continue to include an assessment factor to compensate for this, as is required in  
846 some regulatory guidance (EFSA, 2013; TGD, 2003). Using an assessment factor  
847 with the HC5 or HC5<sub>(2.5)</sub> to establish a protection limit may appear to undermine  
848 the benefits of conducting a more accurate, reliable and robust SSD but more  
849 confidence can be applied to an empirically derived HC5/HC5<sub>(2.5)</sub> with a smaller  
850 assessment factor (of less than 10, although further investigation is required as  
851 these are still largely arbitrary) and for which error can be quantified.  
852 Furthermore, a HC5 has greater certainty compared with the current PNEC and  
853 thus a reduced likelihood of underestimating the PNEC where interspecies  
854 variability is high and overestimating the PNEC where interspecies variability is  
855 low. Finally, a SSD based on an EC<sub>x</sub> avoids the criticisms of the NOEC that is  
856 flawed and dependent of experimental design.

857 The SSDs highlight that for the majority of MECs there is a limited general effect  
858 on cyanobacteria in the natural systems (potentially affected proportions of  
859 <1%) from all antibiotics based on the median MEC, which was based on data  
860 where the non-detects were excluded and thus a worse case scenario. However,  
861 60, 96 and 44% of cyanobacteria may be affected when exposed to the highest  
862 cefazolin, cefotaxime and ampicillin environmentally relevant MECs recorded in  
863 the UBA database (Umwelt bundesamt, 2018). Our analysis therefore suggests  
864 that there are some cyanobacterial communities that may be severely affected by  
865 antibiotic pollution with potential consequences on the ecosystem functions that  
866 they provide. Equally, however, our data suggests that these effects are likely to  
867 be restricted to a small number of highly contaminated locations. In order to  
868 better estimate the risk of antibiotics in the environment, there is an urgent need

869 for more quantitative data on antibiotics in freshwater systems allowing for a  
870 better understanding of the distribution of MECs and more accurate estimations  
871 on possible associated risks.

872 Our results also show that a more comprehensive understanding of the effects of  
873 antibiotics upon prokaryotic diversity is needed for appropriate environmental  
874 protection. We argue that an ERA should include consideration of microbes that  
875 are known to play key roles in ecosystems function/services, such as nitrifying  
876 bacteria or sulphate-reducing bacteria as some of the organisms we may wish  
877 most to protect. Additionally, the effects on community structure and diversity  
878 should also be considered given that if a specific group of bacteria in a  
879 community increased or decreased in abundance due to antibiotic exposure,  
880 there may be significant consequences for the normal functioning of that  
881 community.

## 882 **5. Conclusions**

883 In this study we have used a microplate assay to assess the relative interspecies  
884 sensitivity of a range of cyanobacteria to the effects of seven antibiotics spanning  
885 three general MoAs. Our experimental data verify the findings of a meta-analysis  
886 of published literature (Le Page *et al.*, 2017) where large interspecies sensitivity  
887 is observed and is influenced by the MoA. To our knowledge, we present the first  
888 environmentally relevant bacterial data for cefazolin and sulfamethazine.  
889 Although a PNEC established using an assessment factor of 10 on a NOEC  
890 appears to generally be protective when a sensitive species for that antibiotic is  
891 tested, it may cause protection limits to be either over- or under-protective

892 depending on the MoA. This approach may also result in an increased level of  
893 uncertainty around the PNEC estimated. We conclude a probabilistic approach  
894 using an SSD and several bacterial assays that cover a wider range of bacterial  
895 diversity would better protect against the detrimental effects of antibiotics on  
896 the environment. These results therefore support previous recommendations by  
897 Le Page *et al.* (2017) and Brandt *et al* (2016) to widen the number of bacterial  
898 and cyanobacteria species tested. The data presented also suggest that  
899 cyanobacteria may not be a suitable group of bacteria for determining  
900 environmental risk to sulfonamides due to their insensitivity relative to other  
901 environmentally important taxa (e.g. other bacterial clades or macrophytes (Le  
902 Page *et al.*, 2017)). Finally, we show that the highest recorded MECs in the  
903 literature may pose a significant threat to cyanobacteria populations.

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908 GLP is a former employee and current shareholder of AstraZeneca PLC. JRS is an  
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