

Federal Institute for Drugs and Medical Devices HESI GTTC Potsdam March 22/23 2018 Applied Genetic Toxicity for Regulatory Decision Making: The Road Ahead



Incorporating Mode of Action into Genetic Toxicity Assessment

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Contents

- 1. Purpose of and basic test battery in genetic toxicity
- 2. Example for standard battery positive compound
- 3. Mode of action determination for risk assessment
- 4. Novel techniques for MoA determination to get to an AOP
- 5. Incorporation into risk assessment
- 6. Conclusions



Current Gentox Test Strategy for Pharmaceuticals CHMP/ICH/126642/08 ICH S2 (R1)



Frötschl | MoA in GTx RA | HESI GTTC March 22nd 2018 | Page 4



and Medical Devices

Aim of the basic test strategy

- Identify mutagenic substances
 - Considered to be potentially carcinogenic
 - cause inheritable DNA-alteration which potenially lead to genetic diseases
- Protect consumers/patients from any inacceptable risk for
 - developing cancer or acquiring genetic diseases
- Protect populations from any inacceptable risk for
 - Increase of genetic diseases
 - Increase in predisposition for cancer
- Standard battery is focused on the detection of inheritable DNA alterations
 - Gens mutation, chromosome mutations, genome mutations





Consequences of basic test battery results

- Fine as long as test results are negative and no hazard is identified
- Problems start with positive test results and the question
 - Is the hazard a risk?
 - Generally additional testing for MoA are required for the risk assessment of a genotoxic compound
 - Exclusion of direct reaction with the DNA and a dose response with a clear NOEL is required



MLA/Cab positive?!

lamaged base

No mutation

single-strand





intra-strand

inter-strand

double-strand crosslink



Limitations of the standard battery

- with current standard genotoxicity test battery models
 - prediction of the real risk of genotoxic compounds for mutagenicity in humans is difficult or nearly impossible, guidance for MoA clarification is very limited
- What we do is to assume a worst case and get to the safe side of it

• This is very conservative and overestimates the real risk (in most cases)





Informed risk assessment improves safety assessment in genotoxicity

- This needs data on
 - Mode of action
 - Dose response and point of departure for relevant effects
 - Transspecies relevance
 - Exposure assessment
 - Environmental/human relevance



Basic quatitative risk assessment for threshold (PoD) related mechanisms

- Currently a quantitative risk assessment is only accepted for compounds
 - not directly interacting with DNA (not-DNA-reactive)
- Compounds interacting directly with DNA (e.g. alkylating agents) are still in most cases regulated conservative with a yes/no risk assessment
 - Yes means there is no PoD, any dose is considered to pose a mutagenic risk
 - Acceptability is considered only for doses with a theoretical cancer risk of 1:100,000 for pharmaceuticals or 1:1,000,000 for food additives



Determine the mode of (genotoxic)-action

- Mode of action determination needs to explain the mode of genotoxic activity
- this means practically the determination of the key activity of a molecule that leads to the final adverse outcome
- We need to know the
 - determinative molecular event (MIE molecular initiating event)
 - the dose response of the final adverse effect (gene, chromosome, genome mutations)



MoA in risk assessment Fluoroquinolones



Figure 1. Complex of DNA linked to GyrA-Tyr₁₂₂ and docked quinolones: COOH-moeities of ligands point out of (left) and into plane (right); enzyme shown in grey, QRDR in lightblue, Ser₈₃, Ala₈₄ and Asp₈₇ in α_4 helix in yellow, orange and magenta, resp.; G in green, C in yellow, T in blue and A in red.

from Lenz et al. NIC Series, Vol. 40, ISBN 978-3-9810843-6-8, pp. 289-292, 2008



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Mode of Action (MoA)

• Pharmacological (antibacterial) activity is inhibition of bacterial gyrase and topo IV inhibitor

• MoA for adverse genotoxic reactions in mammals is considered to be the inhibition of mammalian topo II





Genetic Toxicity Assessment 1

- Standard battery test data
 - AMES
 - In vitro chromosome damage/MLA
 - In vivo chromosome damage/MN





Mutations in *Salmonella typh TA102* by Ciprofloxacin

Revertants in TA 102



Data from Clerch et al. 1996, Env Mol Mutag 27:110-115





Ciprofloxacin MN induction in vitro

Lynch et al. 2003, Mutagenesis 18:345-353



Micronucleus Test in Mouse Lymphoma Cells





MN in vivo in NMRI mice in PCEs by Ciprofloxacin

Micronuclei formation



Data from Herbolt et al. 2001, Mut Res 498:193-205





Standard battery result for ciprofloxacin

The standard battery result

bacterial mutagenicity

MN in vitro mammalian cells

MN in vivo rodent BM

positive

positive

negative



Frötschl | MoA in GTx RA | HESI GTTC March 22nd 2018 | Page 17

Standard battery positive Knowledge on Mode of Action nessecary for risk assessment

Mode of Action determination

- We need data to demonstrate
 - The lack of direct DNA reactivity
 - The mode of action leading to mutations
 - The target molecule/enzyme
 - The target molecule to be the key driver of mutation induction
 - The dose response to demonstrate a PoD (threshold)



Selectivity on target enzymes

Minimal Concentration to induce DNA-strandbreaks (cell-free assay)

	CC ₁₀ (µg/ml)		
Fluoroquinolone	Gyrase	Topoisomerase II	Factor
Pradofloxacin*	0.005	4	800
Enrofloxacin*	0.005	6	1200
Marbofloxacin*	0.005	10	2000
Danofloxacin*	0.005	25	5000
Orbifloxacin*	0.005	25	5000
Ciprofloxacin*	0.005	10	2000
Moxifloxacin*	0.01	6	600
Gemifloxacin*	0.01	1	100

* Data from Koerber-Irrgang B, Dissertation, University Hamburg 2005



Specific functional complex induction



Fig. 1. TARDIS assay results in L5178Y mouse lymphoma cells. (A) Concentration-dependent increase in SCC formation with etoposide. (B) Time-dependent reversal of SCC formation following removal of etoposide (60 μ g/ml). (C) SCC formation by known mammalian topoisomerase II poisons [doxorubicin (3 μ g/ml), genistein (27 μ g/ml), mitoxantrone (2.6 μ g/ml) and ellipticine (1.2 μ g/ml)] and two mammalian non-topoisomerase II poisons [aclarubicin (2 μ g/ml) and

Lynch et al. 2003, Mutagenesis 18:345-353



Induction of yH2AX as measurement for DSB





Frötschl | MoA in GTx RA | HESI GTTC March 22nd 2018 | Page 22

Summary of ciprofloxacin

- Biochemical target is not DNA
- Hugh difference between effect on bacterial and mammalian target enzym
- Dose response of all assays show effects at high doses only
- Sufficient difference between human exposure and rodent exposure at doses with no genotoxic effect



Adverse outcome pathways – AOP – moving forward in MoA determination

- The MIE is the start of the an AOP
 - Knowledge of the dose response of the MIE
- The key events in the AOP
 - The more of the key events we know following the MIE
 - The more precise we may be to determine the complete dose response relationship between exposure and apical outcome
- This however is not possible with classical standard test systems:



Potential AOP for catalytic topo II inhibition





1 / 1 5

Dose response relationship between key events



Risk assessment using dose response of AOP

Clinical exposure, single dose



Acceptability of this will depend on the level of uncertainty in the model





Conclusions

- Mode of action determination is crucial for genetic toxicity assessment of compounds positive in the standard battery
- Sufficient data on dose response relationship of genetic toxicity endpoints is needed for margin of exposure determination and acceptability of risk
- More informed MoA determination would potentially improve genetic toxicity assessment and also improve risk assessment
- AOPs for genetic toxicity pathways will provide guidance for MoA determinantion and help to improve experimental strategies in genetic toxicity testing
- Quantitative data on MIE and KCE in AOPs will support approaches in quantitative risk assessment in genetic toxicity





Thank you very much for your attention!

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