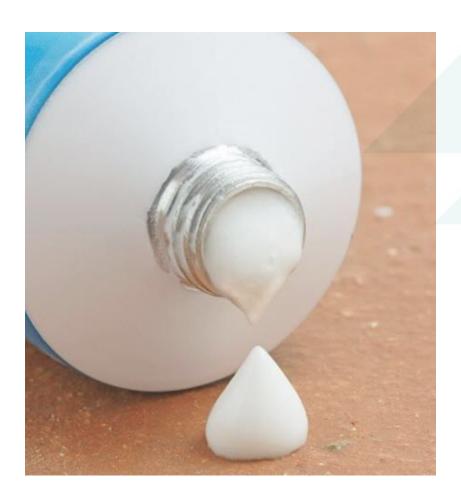






Topical Products General Considerations



- Targeted/ Locally acting
- Reduced/no systemic effects
- Vehicle effect > No true placebo
 - both in terms of efficacy as well as local tolerance
- Formulating challenges
 - Solubility/ Release
 - Delivery of actives into the skin
- Local tolerance
 - active & excipients!



Dermal Safety Testing Key Objectives

- Aid product development
 - Evaluating different formulas
 - Risk assessment under standardized/maximized exposure
- Regulatory requirements (Phase 1 profile for topical formulations)
 - Cumulative Irritation Potential
 - Sensitization Potential
 - Phototoxicity Potential*
 - Photosensitization Potential*

*If formulation absorbs in UV spectrum (molar extinction coefficient (MEC) greater than 1000 L mol-1 cm-1 (between 290 and 700 nm)

(S10 Photosafety Evaluation of Pharmaceuticals , Guidance for Industry -- U. S. FDA, January 2015 ICH)



Dermal Safety Testing General Notes/ Commonalities

- Internationally generally accepted standard study designs
 - Combination studies possible (but not necessarily advisable)
- Patch tests with maximized exposure conditions to detect specific responses
- Intraindividual within subject comparison (allowing to test >1 product/ subject)
- Visual scoring by expert graders (confirmed by dermatologists)
- Single center/ simultaneous inclusion of panel
- Poll 3: Prioritization/ Timing of Dermal Safety Testing in Clinical Development Plan



Patch Test Systems



Finn Chambers®

Hilltop Chambers®



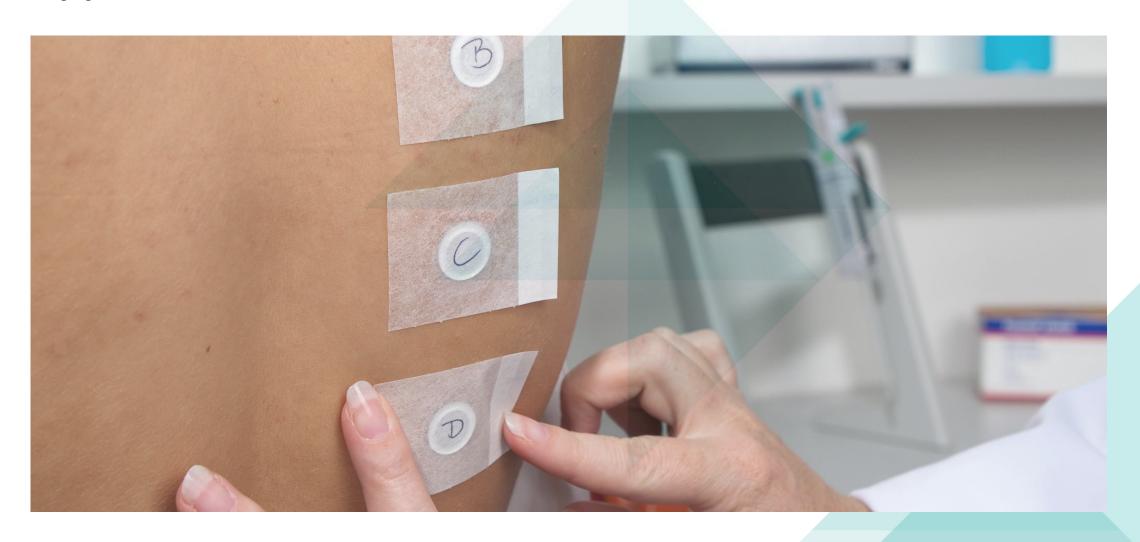
Application



- Preferably by Volume, typically 0.2 ml
- Custom tailored Eppendorf Research Pipettes



Application





Clinical Grading / Scoring Scoring Scales & Procedures

- Global assessment vs. separate grading of various attributes
- All scales are NON-linear (ordinal)
- If score > threshold: discontinued patching and LVCF (alt. max VCF)
- Inter-Grader reliability is paramount
 - Training & annual re-training by Dermatologist, Allergologist
 - Same grader should grade same subject throughout the course of the study (pre-defined backup)
 - Graders need to be blinded (observer-blind)



Clinical Grading / Scoring Principles & Considerations

- Standard ambient conditions (temperature & lightening)
- Acclimation (rest) period before grading
- Start with overview from slight distance (approx. 1 m) to get impression of general skin pattern
- Grade each site separately
- Palpate (touch) if dermal response (edema, papules are suspected/present)
- Beware of tape-reactions
- Dermatologist: Review of all 'above-threshold-reactions'/grading at select time-points
- Photo documentation of all 'above-threshold reactions' recommended



Phase 1 - Standard Protocols for Dermal Safety



- Cumulative Irritation
 (21 Day Irritation Test)
- Sensitization (HRIPT)
- Phototoxicity
- Photosensitization



Cumulative Irritation Potential 21-Day-Irritation Patch Test: Test Design

- Subjects: 35 (30 finishing) healthy volunteers
- Duration: 3 weeks
 21 applications for 23 h (alt. 3 x 5 applications for 23 h)
- Evaluations: Daily: 30-60 min after patch removal
- Exposure: Occluded patch or semi-occluded
- Test Products: max. 10: Active, Vehicle, positive & negative Controls, Reference(s) optional
- Variations
 14-day design
 Pre-damaged (tape stripped skin)



Clinical Grading / Scoring Cumulative Irritation

```
    no apparent cutaneous involvement
    equivocal reaction
    slight erythema with or without edema
    moderate erythema, edema with or without papules
    severe erythema, edema with or without papules
    severe erythema, edema with vesicles or blisters
```

^{*} discontinue patching: LVCF



Photographic Scale Cumulative Irritation Score



0 = No visible skin reaction



0.5 = Doubtful skin reaction



1 = Slight erythema



2 = Moderate erythema



3* = Severe erythema



4* = Severe erythema, edema



Sensitization Potential Human Repeat Insult/ Epicutaneous Patch Test (HRIPT/HREPT)

- Schwartz, 1941
- Repeat Insult Shelanski, 1951, 1953
- Repeat Insult Draize, 1944, 1951, 1953
- Modified Draize (Marzulli & Maibach), 1973, 1974



HRIPT Study Design

| Phases | Induction | | | | | Rest Challenge | | | | | | | | | |
|----------------------|----------------------------|--------------|----------------------------|---------------|----------------------------|----------------|---------------|----------|-------|--------------------|----|----------|----------|----------|----------|
| Week | 1 - 3 | | | | | 4 - 5 | | | | | | | | | |
| Days | 1 8 15 | 2 9 16 | 3 10 17 | 4 11 18 | 5 12 19 | 6 13 20 | 7 14 21 | 22 | 23-35 | 36 | 37 | 38 | 39 | 40 | 41 |
| Patch Application | > > > > | | · · · | | · · · | | | | | naive v site | | | | | |
| Patch Removal | - • | | > > > > | | > > > | | | ~ | | | | ~ | | | |
| Scoring | - * | | > > > > | | > > > > | | | ~ | | | | ~ | ~ | ~ | ~ |



Sensitization Potential HRIPT: Test Design

- Subjects: 230 (200 finishing) healthy volunteers
- Exposure: Occluded patch or semi-occluded
- Test Products: max. 4: Active, Vehicle, Reference(s) optional
- Duration: 6 weeks*

^{*}Re-Challenge as needed, > 4 weeks after Challenge



Clinical Grading / Scoring Sensitization

| Skin appearance (dermal response) | Other effects |
|--|---|
| 0 = no evidence of irritation 1 = minimal erythema, barely perceptible 2 = definite erythema, readily visible and minimal edema or minimal papular response 3 = erythema and papules 4 = definite edema 5 = erythema, edema and papules 6 = vesicular eruption 7 = strong reaction spreading beyond test site | N (0) = no other observations A (0) = slight glazed appearance B (1) = marked glazed appearance C (2) = glazing with peeling and cracking F (3) = glazing with fissures G (3) = film of dried serous exudate covering all or part of plaster application site H (3) = small petechial erosions and/or scabs |

FDA 2018 Guidance for Industry: Assessing the Irritation and Sensitization Potential of Transdermal and Topical Delivery Systems for ANDAs; Draft guidance

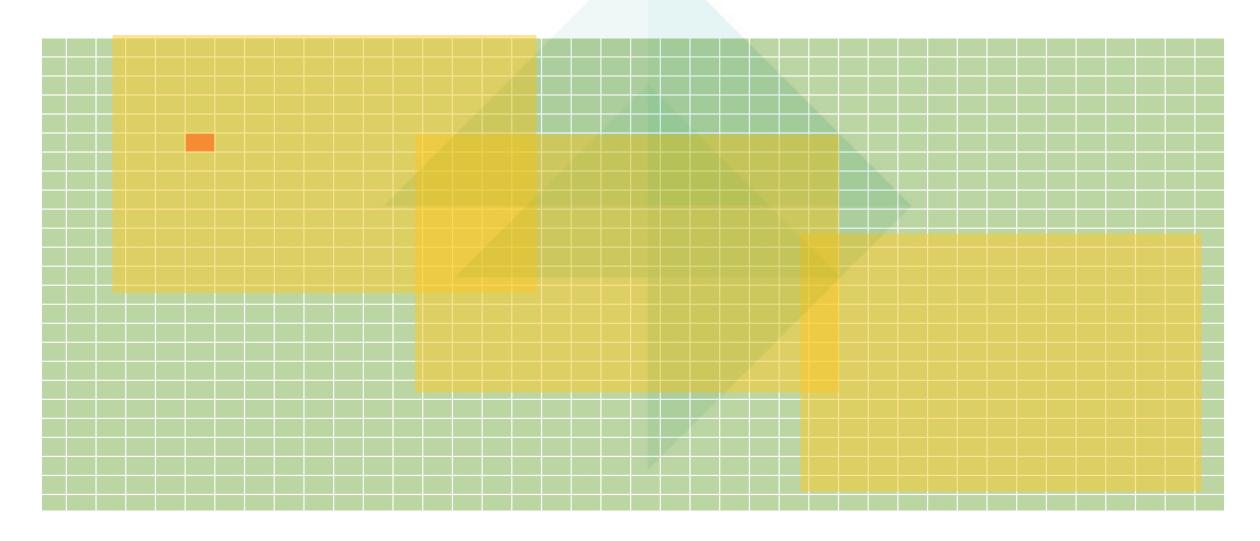


HRIPT: Statistical Considerations Why 200 Evaluable Subjects

- Only genetically predisposed individuals get sensitized
- Statistical Considerations
 - If an effect (sensitization) is not observed in a study population how certain is this effect absent in the general population?



HRIPT: Study Population vs. General Population





HRIPT: Statistical Considerations Why 200 Evaluable Subjects

- Only genetically predisposed individuals get sensitized
- Statistical Considerations
 - If an effect (sensitization) is **not observed** in a study population how certain is this effect **absent in the general population?**
- In the absence of sensitization in a test panel of 200 subjects the 95 % upper confidence boundary for sensitization in the general population would be 1.5 % (double the boundary for half the test panel size, i.e. 3 % !)



Interpretation of Data in a Sensitization Study Irritation or Sensitization

Klaus-Peter's Rule

- Challenge Score > Induction Score
- Challenge Score @72h ≥3 (papules) (spreading beyond test site)
- Challenge Score @72h (96, 120h) ≥ @48h, i.e. Crescendo reaction
- All of the above: indicative of Sensitization, i.e. no re-challenge necessary



Interpretation of Data in a Sensitization Study FDA Guidance

A subject should be considered potentially sensitized if all the following criteria are met

- Skin reactions that resolve before 48 hours are generally considered to be caused by irritation rather than by sensitization
- The subject has a combined irritation score of ≥ 2 at their last evaluation during the challenge phase
- The above two criteria were met during both the challenge phase (and – if performed – during the re-challenge phase)

FDA 2018 Guidance for Industry: Assessing the Irritation and Sensitization Potential of Transdermal and Topical Delivery Systems for ANDAs; Draft guidance



Reactions differ Photo documentation of positive reactions advisable!

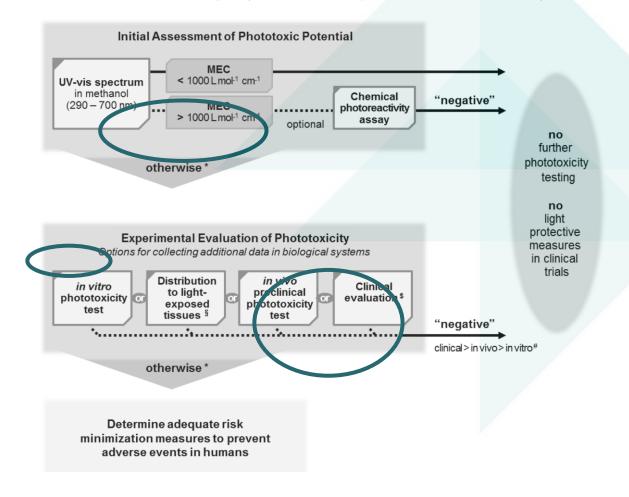








S10 Photosafety Evaluation of Pharmaceuticals Guidance for Industry (January 2015; ICH)





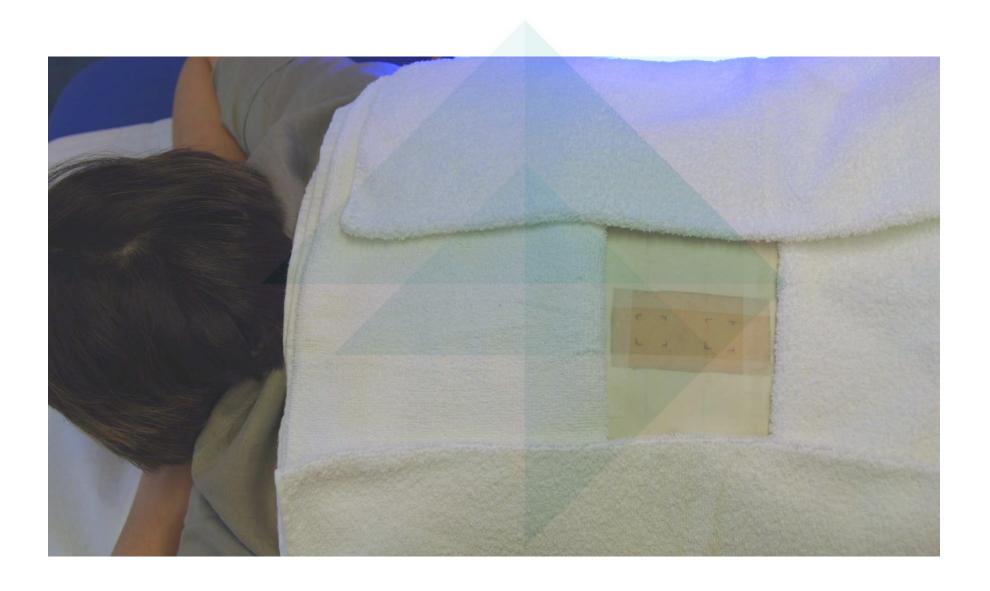
Phototoxicity Potential Test Design

- Subjects: 35 (30 finishing) healthy volunteers, Fitzpatrick skin photo types 1, 2 & 3
- Duration: 4 Days
 - Day 1: application in duplicate sets (irradiated & non-irradiated) for 24 h
 - Day 2: Irradiation with UV-light (0.5 MED + 5 J/cm2 UVA)
 - Evaluations: Daily: before and 24 and 48 h post irradiation
- Exposure: Occluded patch or semi-occluded
- Test Products: max. 10: Active, Vehicle, un-irradiated Controls, Reference(s) optional
- Note
 No positive control for ethical reasons















Photoallergy Potential Photosensitization: Test Design

- Subjects: 55 (50 finishing) healthy volunteers
 - 3 weeks induction
 - 6 applications in double sets (irradiated & non-irradiated) for 24 h; Irradiation with 0.5 2 MED (UVB+UVA following patch removal
- 2 weeks rest period
- 1 week challenge: 24 h application followed by 0.5 MED + 5 J/cm2 UVA exposure
- Evaluations:
 - Induction: Daily (24 hrs. post application & 24 and 48 hours post irradiation)
 - Challenge: Days 2, 3, 4, 5 / Re-Challenge as needed, > 4 weeks after Challenge
- Exposure: Occluded patch or semi-occluded
- Test Products: Active, Vehicle, un-irradiated Controls (No positive control for ethical reasons)



Special Case: Products for Skin with Impaired Barrier Wound Care, Products for Mucosae

Scratch Chamber Test ('Scarified' Chamber Test)

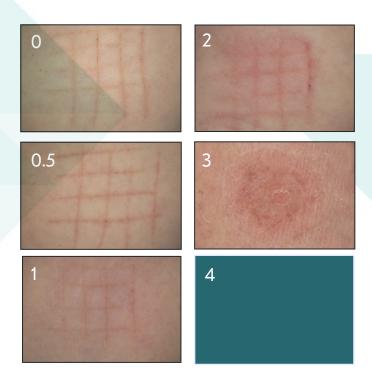
| Day | 1 | 2 | 3 | 4 |
|--|---|---|---|---|
| Scratching | × | | | |
| Application of test materials | × | × | × | |
| Patch removal (23 h after the last application of test materials by subjects) | | × | × | X |
| Visual evaluation (24 h after the last application of test materials by a trained evaluator or, 1 h after patch removal) | | x | X | X |





Scratch ("Scarified") Chamber Test

- 0 = No visible skin reaction
- 0.5 = Faint, definite or diffuse erythema (greater than 0, less than 1)
- 1 = Mild erythema in test area, maybe stronger within the scratched sites
- 2 = Moderate erythema in test area, maybe stronger near the scratched sites or broader bands of increased erythema with or without rows of vesicles, pustules or erosions
- 3* = Strong erythema in test area, maybe stronger around the scratched sites OR severe erythema with partial confluency with or without other lesions
- 4* = Confluent severe erythema sometimes associated with edema, necrosis and bulla formation
- * No further application of the product for the duration of the study. In that case the last value of the respective product(s) will be carried forward for the rest of the testing period.





Reproducibility of the chamber scarification test

KLAUS EJNER ANDERSEN

Department of Dermatology, Odense University Hospital, Denmark

| | Negative Control | Positive Control |
|-------------------------------|------------------|------------------|
| Median | 2.1 | 9.6 |
| 25 % CI | 1.9 | 9.0 |
| 75 % CI | 2.9 | 10.2 |
| Least/Most irritating product | 12/13 | 11/13 |



Cumulative Irritation Potential 21 Day Cumulative Irritation Test

Journal of Toxicology: Cutaneous and Ocular Toxicology

A Reappraisal of the 21-Day Cumulative Irritation Test in Man

S. Berger Richard & P. Bowman James

- The standard 21-day cumulative irritation test was re-examined to determine if it could be abbreviated
- The relative scores on 150 cosmetic-type products were compared at 14 and 21 days
- In more than 90 % of products studied, authors found that one would have made the same decision regarding the level of irritation and the relative ranking of the products at either 14 or 21 days.

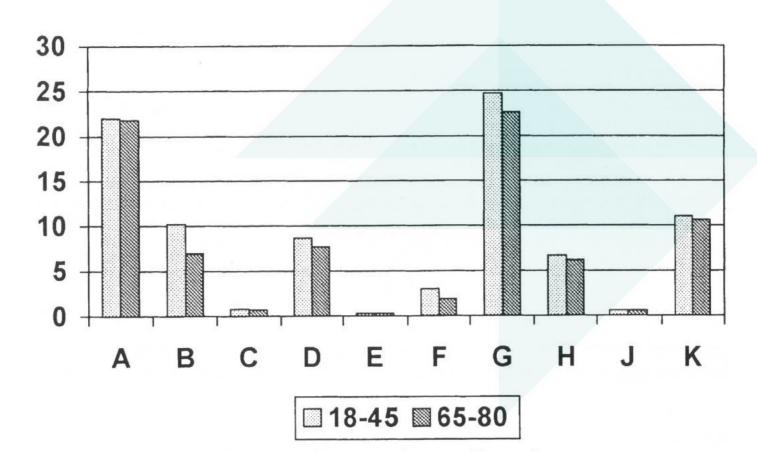


Cumulative Irritation Influence of Geographical Location

| | Arizona | Florida | Manitoba |
|----------------------------------|-------------|-------------|--------------|
| Cumulative irritation (0 1% SLS) | 30.3 ± 2.7 | 29.9 ± 1.0 | 29.9 ± 2.5 |
| Cumulative irritation (saline) | 1.2 ± 1.0 | 0.1 ± 0.1 | 1.2 ± 1.3 |
| Temperature (°C) | 24.1 ± 10.4 | 21.0 ± 5.52 | -2.4 ± 20.5 |
| Relative humidity (%) | 32.7 ± 17.8 | 71.7 ± 5.3 | 72 ± 10.7 |
| Dew point (°C) | 4.3 ± 4.4 | 15.5 ± 5.4 | -3.98 ± 19.2 |



Cumulative Irritation Influence of Age





Dermal Safety Testing Summary

- Timing: Prior to or in parallel with phase II / III
- Pilot Study ahead of main panel advisable if concerns re. tolerance present
- Single center, block enrollment, parallel execution enables expedient timelines
- Intraindividual comparison possible
- Vehicle Control mandatory, esp. with anti-inflammatory active
- Regular training and experience of graders necessary
- Specific dermatologic expertise for oversight & interpretation of results mandatory