

# The key characteristics (KCs) approach to hazard identification

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## Conflict of Interest Statement

- I am retained as a consultant and potential expert witness in U.S. litigation involving chemical exposures and disease outcomes, including cancer, on behalf of plaintiffs.
- I have no formal association with IARC, US EPA or CalEPA, but have an ongoing contract with OEHHA (Cal EPA) to further develop the key characteristics approach.
- The views expressed are solely my own.

## Summary of today's talk

- Scientific findings providing insights into mechanisms of toxicity play an increasingly important role in hazard identification
- The key characteristics (KCs) provide the basis for a knowledge-based, objective approach to evaluating mechanistic data in hazard evaluations that contrasts with and compliments the reductive MOA/AOP approach
- Recent IARC Monograph, EPA, CalEPA and NTP evaluations have illustrated the applicability of the KC approach
- Key characteristics for reproductive toxicants, endocrine disruptors, neurotoxicants, cardiotoxicants and hepatotoxicants have or are being developed
- A comprehensive set of biomarkers and assays are needed to measure the KCs

# Need KCs for Evidence Integration in Identifying Chemical Hazards

- Human studies epidemiology
- Animal studies usually in rodents –acute, subchronic and chronic studies
- In vitro studies e.g. HTS: Tox21/Toxcast
- Mechanistic data in humans (biomarkers), animals, in vitro and in silico – Provides biological plausibility, increasing in importance, and KCs could enlighten approaches to testing

## Mechanistic Data: Challenges



*IARC Monographs*Volume 100

- How to search systematically for relevant mechanisms?
- How to bring uniformity across assessments?
- How to analyze the voluminous mechanistic database efficiently?
- How to avoid bias towards favored mechanisms?

# The Classical Approach to Mechanistic Data has been Hypothesis Driven

Analysis of mechanistic data for hazard identification and risk assessment has typically involved developing a mode of action (MOA) or more recently an Adverse Outcome Pathway (AOP)

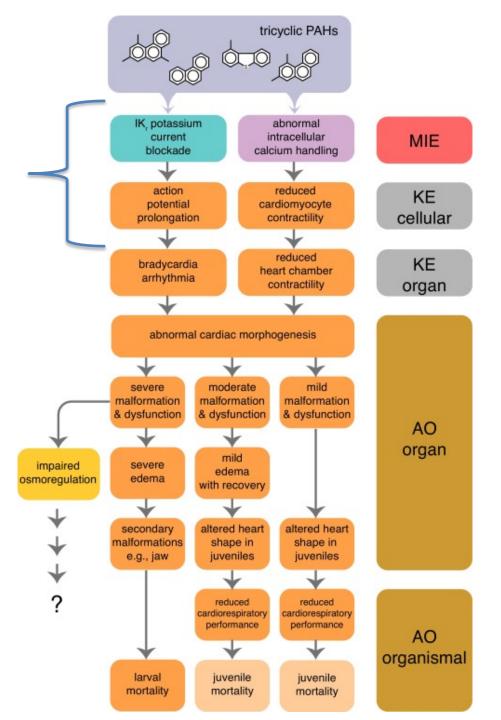
# Key characteristics don't require risk assessor to guess the mechanism

- Mechanistic hypotheses in science are beneficial because if you test it and are wrong then you modify the hypothesis and get closer to the truth
- Mechanistic hypotheses in risk assessment are problematic because if you are wrong you may have made a bad risk decision that cannot easily be changed and may have caused medical or economic harm

# Limitations of MOA/AOP Approach

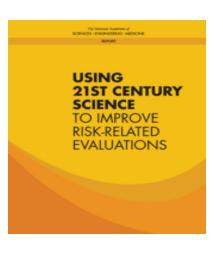
- Focus on 'favorite' mechanism may introduce bias, especially on committees and public databases
- MOA/AOP may be incomplete or wrong [e.g. DEHP Rusyn and Corton (2012)]
- How many 'validated' AOPs needed for 100K chemicals producing 100s of adverse outcomes in different ways?
- KCs can help build unbiased MOA/AOPs if they are needed

# Existing AOPs may also inform future KCs



JP Incardona, NL Scholz (2016) The influence of heart developmental anatomy on cardiotoxicity-based adverse outcome pathways in fish, Aquatic Toxicology, 177, 515-525

# National Academy of Sciences report released January 5, 2017



https://www.nap. edu/download/24 635

#### Using 21st Century Science to Improve Risk-Related Evaluations

260 pages | 6 x 9 | PAPERBACK ISBN 978-0-309-45348-6 | DOI: 10.17226/24635

#### **AUTHORS**

Committee on Incorporating 21st Century Science into Risk-Based Evaluations; Board on Environmental Studies and Toxicology; Division on Earth and Life Studies; National Academies of Sciences, Engineering, and Medicine

# 2017 NAS Report "Using 21st Century Science to Improve Risk-Related Evaluations" – Comments on the Key Characteristics Approach

- The "approach avoids a narrow focus on specific pathways and hypotheses and provides for a broad, holistic consideration of the mechanistic evidence." (p.144)
- "The committee notes that key characteristics for other hazards, such as cardiovascular and reproductive toxicity, could be developed as a guide for evaluating the relationship between perturbations observed in assays, their potential to pose a hazard, and their contribution to risk." (p.141)

## California's Hazard Traits

Toxicological 19 Traits

Exposure Potential 8 Traits

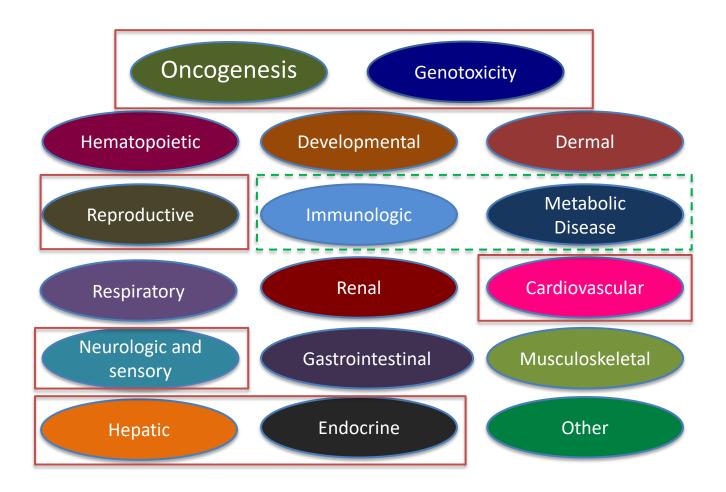
Environmental 9 Traits

Physical 3 Traits

#### **Hazard Traits**

- Term in California legislation
- Coverage: "All of the health end points that are relevant to the people of the state in the design and implementation of programs for toxic chemicals."
- Properties of chemicals

## **CA Toxicological Hazard Traits**



### **Key Characteristics of Human Carcinogens**

#### **Key characteristic:**

- 1. Is Electrophilic or can be metabolically activated
- 2. Is Genotoxic
- 3. Alters DNA repair or causes genomic instability
- 4. Induces Epigenetic Alterations
- 5. Induces Oxidative Stress
- 6. Induces chronic inflammation
- 7. Is Immunosuppressive
- 8. Modulates receptor-mediated effects
- 9. Causes Immortalization
- 10. Alters cell proliferation, cell death, or nutrient supply

Evidence that these characteristics are observed, especially in humans or as intermediate biomarkers in human specimens can provide biological plausibility for epidemiological findings and/or early warning if no epidemiology exists

Smith MT, Guyton KZ, Gibbons CF, Fritz JM, Portier CJ, Rusyn I, DeMarini DM, Caldwell JC, Kavlock RJ, Lambert PF, Hecht SS, Bucher JR, Stewart BW, Baan RA, Cogliano VJ and K Straif. *Env Health Persp.*, 124(6), 713, 2016.

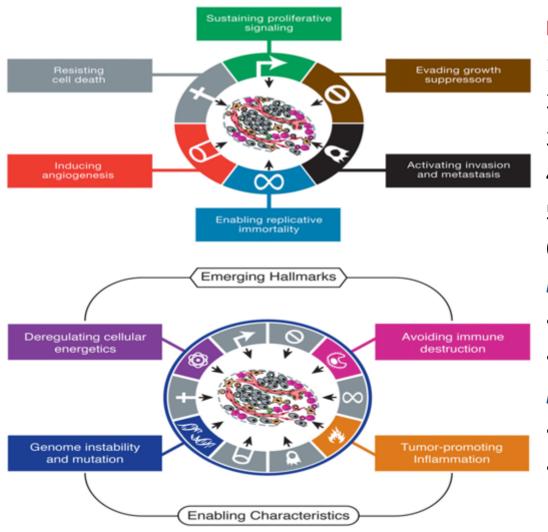
Characteristic	Examples of relevant evidence
1. Is Electrophilic or Can Be Metabolically Activated	Parent compound or metabolite with an electrophilic structure (e.g., epoxide, quinone, etc), formation of DNA and protein adducts.
2. Is Genotoxic	DNA damage (DNA strand breaks, DNA-protein cross-links, unscheduled DNA synthesis), intercalation, gene mutations, cytogenetic changes (e.g., chromosome aberrations, micronuclei).
3. Alters DNA repair or causes genomic instability	Alterations of DNA replication or repair (e.g., topoisomerase II, base-excision or double-strand break repair)
4. Induces Epigenetic Alterations	DNA methylation, histone modification, microRNA expression
5. Induces Oxidative Stress	Oxygen radicals, oxidative stress, oxidative damage to macromolecules (e.g., DNA, lipids)

Characteristic	Examples of relevant evidence
6. Induces chronic inflammation	Elevated white blood cells, myeloperoxidase activity, altered cytokine and/or chemokine production
7. Is Immunosuppressive	Decreased immunosurveillance, immune system dysfunction
8. Modulates receptor-mediated effects	Receptor in/activation (e.g., ER, PPAR, AhR) or modulation of endogenous ligands (including hormones)
9. Causes Immortalization	Inhibition of senescence, cell transformation, altered telomeres
10. Alters cell proliferation, cell death or nutrient supply	Increased proliferation, decreased apoptosis, changes in growth factors, energetics and signaling pathways related to cellular replication or cell cycle control, angiogenesis

## Published papers on KCs of carcinogens

- Smith MT, et al. (2016) "Key Characteristics of Carcinogens as a Basis for Organizing Data on Mechanisms of Carcinogenesis." <u>Environ Health</u> <u>Perspect</u>. 124(6): 713-721. PMCID: PMC4892922.
- Guyton, K Z et al. (2018) "Key Characteristics Approach to Carcinogenic Hazard Identification." <u>Chem Res</u> <u>Toxicol</u>. 31(12):1290-1292. PMID: 30521319
- Smith MT, et al. (2020) "The Key Characteristics of Carcinogens: Relationship to the Hallmarks of Cancer, Relevant Biomarkers and Assays to Measure Them." <u>Cancer Epidemiol Biomarkers Prev.</u> 2020 Mar 9. [Epubahead of print] PMID: 32152214

#### The KCs are not the same as the Hallmarks of cancer



#### HALLMARKS OF CANCER

- 1. Sustaining proliferative signaling
- 2. Evading growth suppressors
- 3. Resisting cell death
- 4. Enabling replicative immortality
- 5. Inducing aberrant angiogenesis
- 6. Activating invasion & metastasis

#### **Emerging Hallmarks**

- Reprogramming energy metabolism
- Evading immune destruction

#### **Enabling Characteristics**

- Genomic instability and mutation
- Inflammation

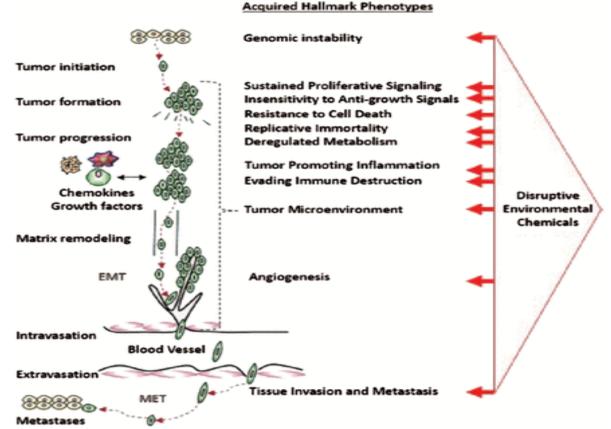
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## A Hallmark versus a Key Characteristic

A Hallmark describes what is (biology)

- A Key Characteristic (KC) of a chemical (agent) describes a property that makes the "what is" happen
- Key characteristics of a carcinogen are the properties that make it carcinogenic

#### Chemicals and other stressors act at different points on the disease continuum



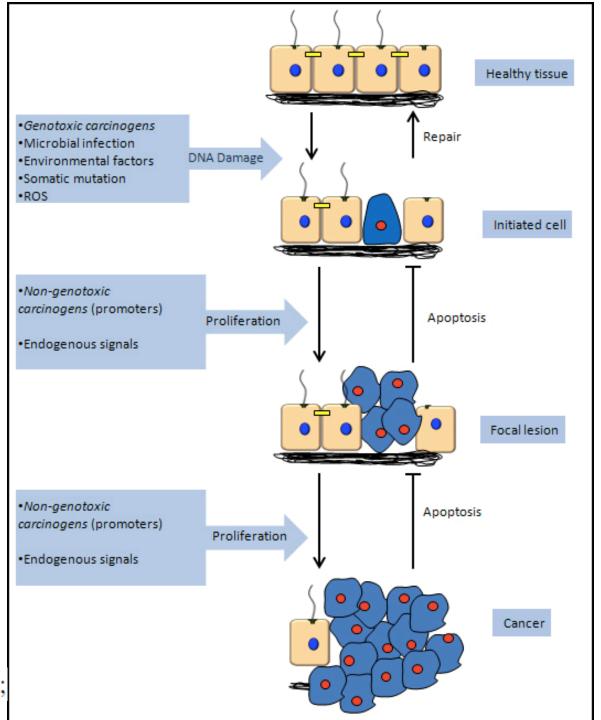
"Considering the multistep nature of cancer and the acquired capabilities implied by each of these hallmarks, it is therefore a very small step to envision how a series of complementary exposures acting in concert might prove to be far more carcinogenic than predictions related to any single exposure might suggest. Interacting contributors need not act simultaneously or continuously, they might act sequentially..."

Goodson et al. Carcinogenesis. 2015 Jun; 36(Suppl 1): S254-S296.

# Cancer arises from clonal evolution or selective expansion of cancer stem cells

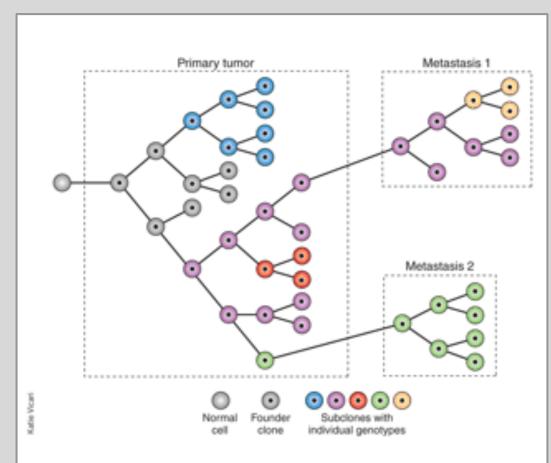
- Most of the key characteristics are unrelated to genotoxicity although some may also result in mutations e.g. inhibition of DNA repair, genomic instability, oxidative stress and inflammation
- Suggests genotoxic and non-genotoxic effects are important in cancer development
- Genotoxic and non-genotoxic carcinogens may act in concert

**Old-fashioned view** of carcinogenesis involving initiation through a genotoxic effect followed by promotion caused by non-genotoxic effects on cell proliferation and apoptosis



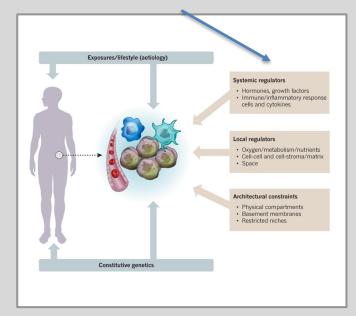
Int. J. Mol. Sci. 2013, 14, 19416-19433;

#### NON-GENOTOXIC EFFECTS IMPORTANT IN TUMOR DEVELOPMENT

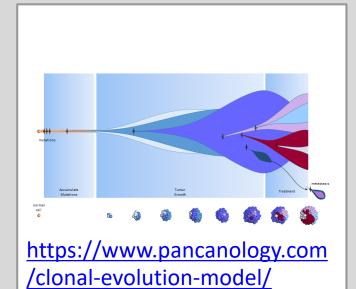


## MUTATIONS OCCUR THROUGHOUT CANCER DEVELOPMENT

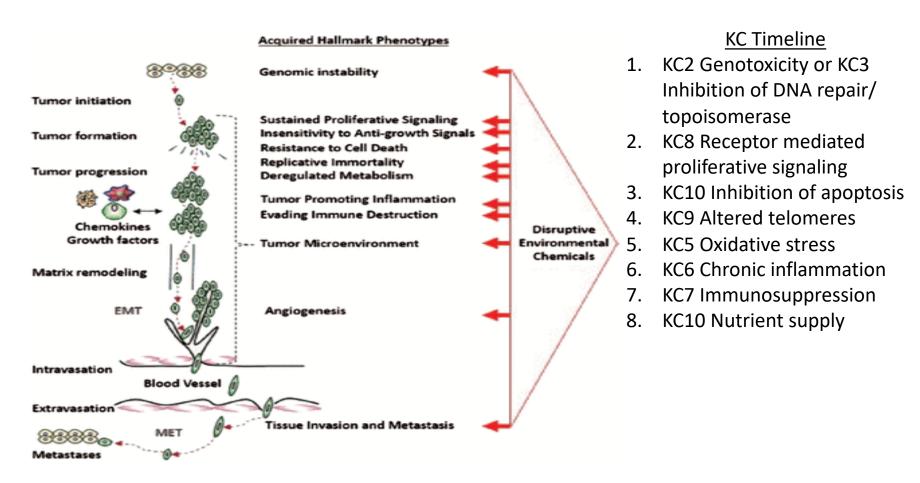
Caldas, C. Cancer sequencing unravels clonal evolution. *Nat Biotechnol* **30**, 408–410 (2012). https://doi.org/10.1038/nbt.2213



#### *Nature* **481,** 306–313 (2012)



# Chemicals and other stressors act through multiple key characteristics at different points on the disease continuum



Working Group on Using the Key Characteristics of Carcinogens to Develop Research on Environmental Mixtures and Cancer

Cynthia V. Rider, Thomas F. Webster, Leroy Lowe, William H. Goodson III, Michele A. La Merrill, Martyn T. Smith, Lauren Zeise, Luoping Zhang, Glenn Rice, Cliona M. McHale

### How do we measure the KC's and study mixtures?

- KC Working Group: Goal was to outline well established in vitro and in vivo assays/biomarkers to assess the KC's, and highlight the gaps in the toolbox
- To facilitate research in the advancement of tools to aid in cancer hazard identification
- Goal eventually will be to identify all useful assays and biomarkers



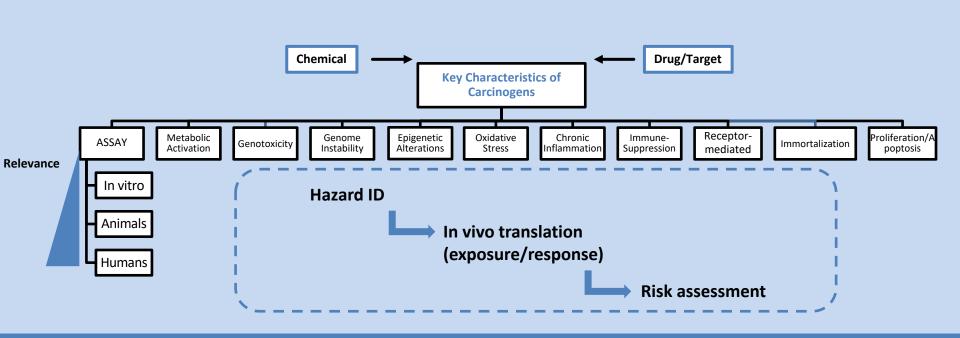
# Representative assays that measure the KCs

- Efforts
underway to
develop a
complete list of
assays and
biomarkers on
the web

Endpoint	In vivo assay in experimental animals	Biomarker assay in humans			
KC 1: Is Electrophilic					
	Protein adduct measurement by LC/Ma	ass spectrometry (PMID:27097313)			
	*Chemoproteomics (PMID:26647369)				
Protein adducts	Hemoglobin or albumin adducts in blood (PMID:12376136)				
	Protein adductomics* (PMID:30857166)				
	DNA adductomics (PMID:29084424, 24437709)				
DNA adducts	Nuclease P1-enhanced (32)P-postlabeling method (PMID:11559540)				
	Mass spectrometry (PMID: 29889312)				
KC 2: Is Genotoxic					
Mutation/single	Transgenic rodent assay (eg. Big	HPRT mutation assay (PMID:			
nucleotide variants	Blue®) (OECD 488)	8829195)			
nucleotide variants	Pig-a assay (PMID: 20857433)	0029193)			
Structural chromosome	some Alkaline comet assay (OECD 489; 16623855)				
alterations/DNA strand	Bone marrow micronucleus assay (OECD 474/487)				
breaks (clastogenicity,	Micronucleus assay in exfoliated cells (PMID: 29152700)				
aneugenicity)	Chromosome aberration (PMID: 21787692)				
	Interphase and metaphase FISH (PMID: 23179826)				

Smith MT, et al. (2020) "The Key Characteristics of Carcinogens: Relationship to the Hallmarks of Cancer, Relevant Biomarkers and Assays to Measure Them." Cancer Epidemiol Biomarkers Prev. 2020 Mar 9. [Epub ahead of print] PMID: 32152214

# How can the KC's be used? Toolbox to improve predictive toxicology and aid risk assessment



Key Characteristics of Carcinogens can be used to define a toolbox to assess new/untested chemicals or agents for carcinogenic hazards

From: Fielden MR, Ward LD, Minocherhomji S, Nioi P, Lebrec H, Jacobson-Kram D., Modernizing Human Cancer Risk Assessment of Therapeutics. *Trends Pharmacol Sci.* 2018; 39(3):232-247

# Working Group on KCs of Endocrine Disruptors and Reproductive Toxicants



# Three papers on KCs of reproductive toxicants and endocrine disruptors

1) Proposed Key Characteristics of Male Reproductive Toxicants as an Approach for Organizing and Evaluating Mechanistic Data in Hazard Assessment

Xabier Arzuaga, Martyn T. Smith... and Gail S. Prins, *Environ. Health Perspect.*, 127 (6), 65001, 2019

2) Proposed Key Characteristics of Female Reproductive Toxicants as an Approach for Organizing and Evaluating Mechanistic Data in Hazard Assessment

Ulrike Luderer, Brenda Eskenazi, Russ Hauser, et al. *Environ. Health Perspect*. 127 (7), 75001, 2019

3) Key Characteristics of Endocrine-Disrupting Chemicals as a Basis for Hazard Identification

Michele A. La Merrill, Laura N. Vandenberg, Martyn T. Smith, William Goodson, et al. *Nature Rev. Endocrinol.* 2020 Jan;16(1):45-57. doi: 10.1038/s41574-019-0273-8. PMID: 31719706

### Key Characteristics of Neurotoxicants and Developmental Neurotoxicants as a Basis for Organizing Data on Mechanisms of Neurotoxicity

#### **Neurotoxicants**

- Pamela Lein (UC Davis) (Chair)
- Aaron Bowman (Purdue)
- Zhengyu Cao (China Pharmaceutical University)
- Monica Carson (UC Riverside)
- Bill Slikker (US FDA NCTR)
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#### **DNTs**

- Thomas Hartung (Johns Hopkins) (Chair)
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- Ellen Fritsche (IUF, Düsseldorf)
- Jean Harry (NIEHS)
- Tim Shafer (USEPA)
- Patty Wong (CalEPA)

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Zeise, Lauren	ОЕННА		
Zhou, Changcheng	UC Riverside		
Contract support:			
Elmore, Sarah	ОЕННА		

## How are the KCs used?

Who is using them?

# Application of the KC approach by IARC, NTP, Toxstrategies & EWG

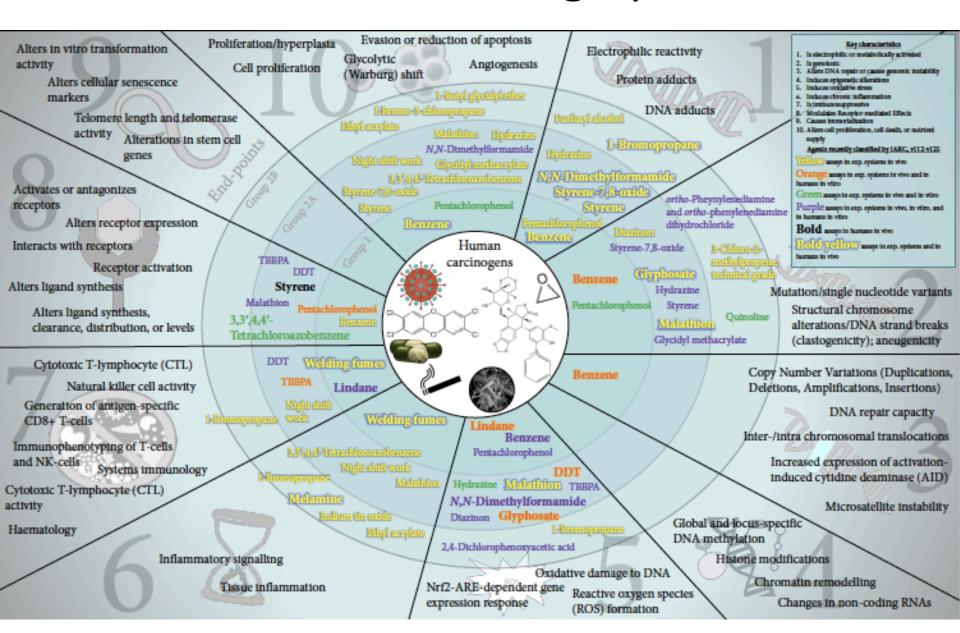
- Guyton, K. Z., et al. (2018). "Application of the key characteristics of carcinogens in cancer hazard identification." <u>Carcinogenesis</u> 39(4): 614-622. (see also IARC Preamble)
- Atwood, S. T., et al. (2019). "New Perspectives for Cancer Hazard Evaluation by the Report on Carcinogens: A Case Study Using Read-Across Methods in the Evaluation of Haloacetic Acids Found as Water Disinfection By-Products." <u>Environ Health Perspect</u> 127(12): 125003.
- Chappell, G. A., et al. (2019). "Lack of potential carcinogenicity for sucralose Systematic evaluation and integration of mechanistic data into the totality of the evidence." <u>Food Chem Toxicol</u>: 110898.
- Temkin, A.M. et al. (2020) "Application of the key characteristics of carcinogens to Per and Polyfluoroalkyl substances." Int J Environ Res Public Health. Mar 4;17(5). pii: E1668. PMID: 32143379

#### **Mechanistic Evidence in IARC Evaluations**

Evidence of Cancer in Humans	Evidence of Cancer in Experimental Animals	Mechanistic Evidence	Evaluation	
Sufficient			Carcinogenic	
	Sufficient	Strong (exposed humans)	(Group 1)	
Limited	Sufficient			
Limited		Strong	Probably carcinogenic	
	Sufficient	Strong (human cells or tissues)	(Group 2A)	
		Strong (mechanistic class)		
Limited	Limited			
	Sufficient		Possibly carcinogenic (Group 2B)	
		Strong (experimental systems)		
	Not classifiable			
	(Group 3)			

Preamble to the IARC Monographs (<u>amended January 2019</u>): https://monographs.iarc.fr/wp-content/uploads/2019/01/Preamble-2019.pdf

## KCs used in IARC Monographs 112-125



# OEHHA's use of the KCs for carcinogens to organize and evaluate mechanistic data

#### Coumarin

https://oehha.ca.gov/media/downloads/crnr/coumarinhid.pdf

Gentian violet

https://oehha.ca.gov/media/downloads/crnr/gentianviolethid 011719.pdf

N-Nitrosohexamethylemeimine

https://oehha.ca.gov/media/downloads/proposition-65/chemicals/nhexhid012519.pdf

Acetaminophen

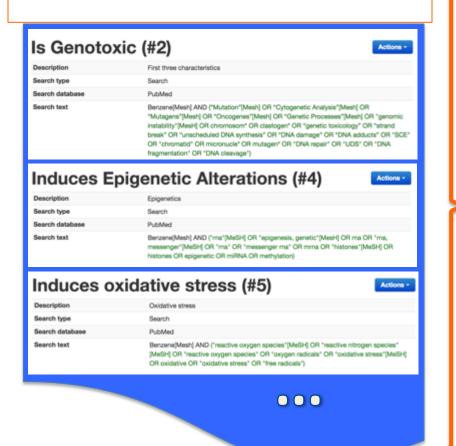
https://oehha.ca.gov/media/downloads/crnr/acetaminophenhid092019.pdf

## **Applications of the KCs**

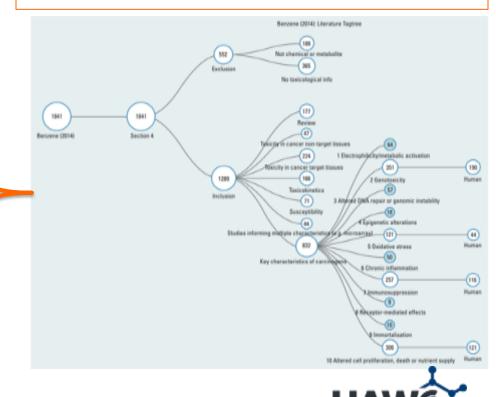
- Facilitate systematic review of mechanistic data and identify data gaps
- Assist in Development of MOA/AOPs or networks through unbiased review
- Improve predictive toxicology and molecular epidemiology for disease prevention

# Systematic Approach Using Key Characteristics of Carcinogens

Targeted searches for each key characteristic



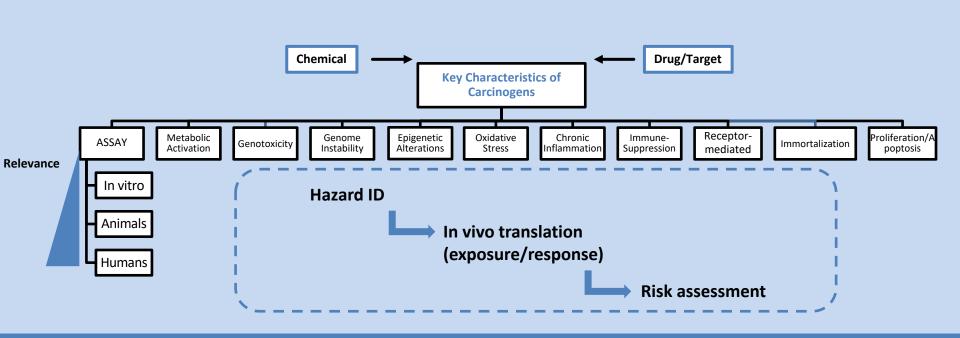
Organize results by key characteristics, species, etc



## **Applications of the KCs**

- Facilitate systematic review of mechanistic data and identify data gaps
- Replace or Assist in Development of MOA/AOPs or networks
- Improve predictive toxicology and molecular epidemiology for disease prevention

# How can the KC's be used? Toolbox to improve predictive toxicology and aid risk assessment



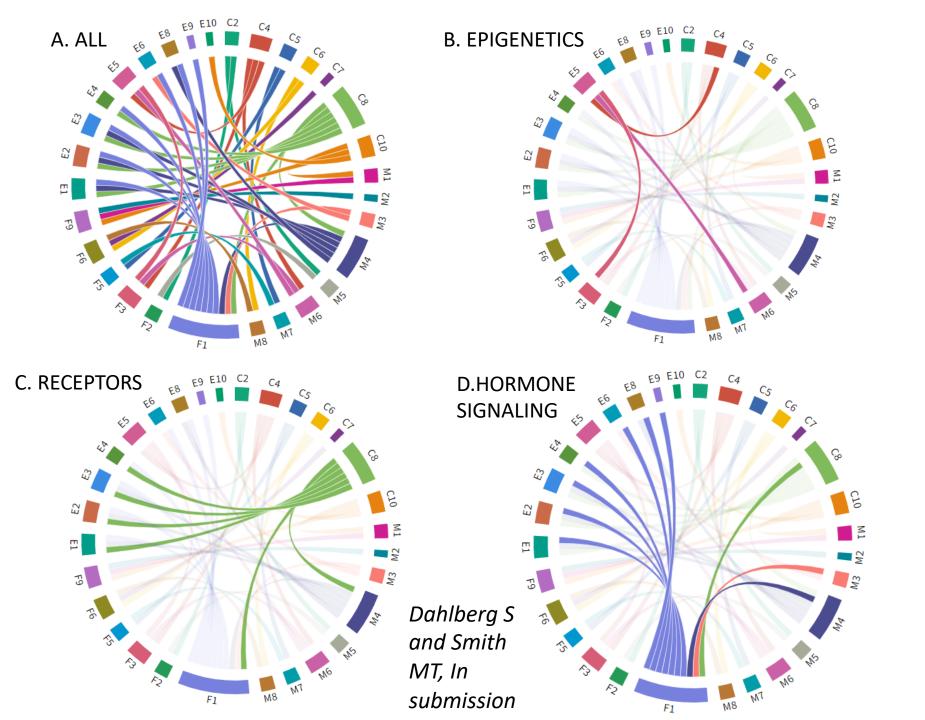
Key Characteristics of Carcinogens can be used to define a toolbox to assess new/untested chemicals or agents for carcinogenic hazards

From: Fielden MR, Ward LD, Minocherhomji S, Nioi P, Lebrec H, Jacobson-Kram D., Modernizing Human Cancer Risk Assessment of Therapeutics. *Trends Pharmacol Sci.* 2018; 39(3):232-247

#### Comparison of Key Characteristics for Different Toxicants

Key Characteristics - Carcinogens	Male Repro	Female Repro	EDC	Neurotox
1. Is electrophilic or metabolically activated	-	-	-	-
2. Is genotoxic	X (5)	X (2)	-	X (10)
<b>3.</b> Alters DNA repair or genomic instability	-	-	-	-
4. Induces epigenetic alterations	X (6)	X (3)	X (5)	X (10)
5. Induces oxidative stress	X (7)	X (5)		X (8)
6. Induces chronic inflammation	X (8)	X (6)	-	X (12)
7. Is immunosuppressive	-	X (6)	-	-
8. Modulates receptor-mediated effects	X (4)	X (1)	X (1, 2, 3, 4)	X (2)
9. Causes immortalization	-	-	-	-
<b>10.</b> Alters cell proliferation, cell death, or nutrient supply	X (1)	X (9)	X (10)	X (1)

There may be key characteristics of bioactive hazardous chemicals





Acknowledgements: Financial support from CalEPA OEHHA (Lauren Zeise, Director) and Research Translation Core of NIEHS SRP grant P42ES004705.

Thanks to the many scientists who have contributed their time and knowledge to KC development, especially Kathryn Guyton of IARC.

#### **Thanks to All the KC Working Group Participants**

#### 90 people; 43 Institutions; 11 Countries to date

Last Name	First Name	Institution	KC Group(s)	Last Name	First Name	Institution	KC Group(s)
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Baan	Robert	IARC (retired)	Carcinogens	Lebrec	Herve	Amgen	Assays & Hallmarks
Barchowsky	Aaron	Uni. Pittsburgh	Cardiotox	Lein	Pamela	UC Davis	Neurotox
Beland	Frederick	FDA (NCTR)	Carcinogens	Lind	Lars	Uni. Uppsala	Cardiotox
Belcher	Scott	N. Carolina State Uni.	Cardiotox	Lowe	Leroy	Getting to Know Cancer	Assays & Hallmarks
Berridge	Brian	NIEHS, NTP	Cardiotox	Luderer	Ulrike	UC Irvine	Female Repro
Beverly	Brandy	NIEHS, NTP	Malerepro	McHale	Cliona	UC Berkeley	Female Repro; Assays & Hallmarks
Borrel	Alexandre	NIEHS, NTP	Assays & Hallmarks	Meyer	Kathleen		Cardiotox
Bowman	Aaron	Purdue Uni.	Neurotox			· · ·	Assays & Hallmarks
Browne	Patience	OECD	EDCs	Moran	Pancho		Female Repro
Bucher	John	NIEHS, NTP	Carcinogens	Pagani	Rodrigo		Male repro
Caldwell	Jane	US EPA (retired)	Carcinogens	Patisaul	Heather		EDCs
Cao	Zhengyu	China Pharmaceutical Uni.	Neurotox	Portier	Christopher		Carcinogens
Cardenas	Andres	UC Berkeley	Assays & Hallmarks	Posnack	Nikki		Cardiotox
Carson	Monica	UC Riverside	Neurotox	Prins	Gail		Male repro
Chen	Tracy	FDA	Cardiotox	Rider	Cynthia		Assays & Hallmarks
Chiamvimonvat	Nipavan	UC Davis	Cardiotox	Rieswijk	Linda		Carcinogens; EDCs; Female Repro; Assays & Hallmarks
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Christiani	David	Harvard Uni.	Carcinogens				
Cogliano	Vincent	ОЕННА	Carcinogens; EDCs; Cardiotox	Rusyn	Ivan Martha	<u> </u>	Carcinogens Malo conces Accourt & Hallmarks
Cooper	Ralph	U.S. EPA (retired)	Female Repro	Sandy			Male repro; Assays & Hallmarks
Corpet	Denis	Université de Toulouse	Carcinogens	Schrader	Steve		Malerepro
DeMarini	David	U.S. EPA	Carcinogens	Shafer	Tim		Neurotox
Elmore	Sarah	ОЕННА	Cardiotox	Skakkebaek	Niels	· · ·	Male repro
Eskenazi	Brenda	UC Berkeley	Female Repro; Neurotox	Slikker	Bill	<u> </u>	Neurotox
Farraj	Aimen	U.S. EPA	Cardiotox	Smith	Martyn	UC Berkeley	Carcinogens; EDCs; Female Repro; Male Repro; Cardiotox; Neurotox; Assays
Felsher	Dean	Stanford Uni.	Assays & Hallmarks	C-laman	Cina		& Hallmarks
Fielden	Mark	Amgen	Assays & Hallmarks	Solomon	Gina		Female Repro
Fritsche	Ellen	IUC, Düsseldorf	Neurotox	Sone	Hideko	·	EDCs; Assays & Hallmarks
Fritz	Jason	U.S. EPA	Carcinogens	Stewart	Bernard		Carcinogens
Gibbons	Catherine	U.S. EPA	Carcinogens; Male repro; Assays & Hallmarks	Straif	Kurt		Carcinogens
Gomes	Aldrin	UC Davis	Cardiotox	Udagawa	Osamu	· · · · · · · · · · · · · · · · · · ·	Female Repro
Goodson	William	UCSF	EDCs; Assays & Hallmarks	van den Berg	Martin	<u> </u>	Carcinogens
Gore	Andrea	Uni. Texas, Austin	EDCs	Vandenberg	Laura	· · · · · · · · · · · · · · · · · · ·	EDCs
Guyton	Kathryn	IARC	Carcinogens; EDCs; Assays & Hallmarks	Vargas	Hugo	0-	Cardiotox
Harry	Jean	NIEHS	Neurotox	Wang	Amy	NIEHS, NTP	Carcinogens; Assays & Hallmarks
Hartung	Thomas	Johns Hopkins	Neurotox	Webster	Thomas	Boston Uni.	Assays & Hallmarks
Hauser	Russ	Harvard	Female Repro; Male Repro	Woodruff	Tracey	UCSF	EDCs
Hecht	Stephen	Uni. Minnesota	Carcinogens	Yang	Xi	FDA	Cardiotox
Hotchkiss	Andrew	U.S. EPA, NTP	Malerepro	Yost	Erin	NIEHS, NTP	Male repro
Houck	Keith	U.S. EPA		Zeise	Lauren	ОЕННА	EDCs; Female Repro; Male Repro; Cardiotox; Neurotox; Assays & Hallmarks
Kavlock	Robert	U.S. EPA	·	Zhang	Luoping	UC Berkeley	Female Repro; Assays & Hallmarks
Kleinstreuer	Nicole	U.S. EPA, NTP	_	Zhou	Changcheng	UC Riverside	Cardiotox
Korach	Kenneth	NIEHS	•	Zlatnik	Marya		Female Repro
Kortenkamp	Andreas	Brunel Uni. London		Zoeller	Thomas		EDCs
	7 11 11 11 11 11	Branci C 2525					<u>,                                    </u>