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1 **Toward an AOP network-based tiered testing strategy for the assessment of**
2 **thyroid hormone disruption**

3

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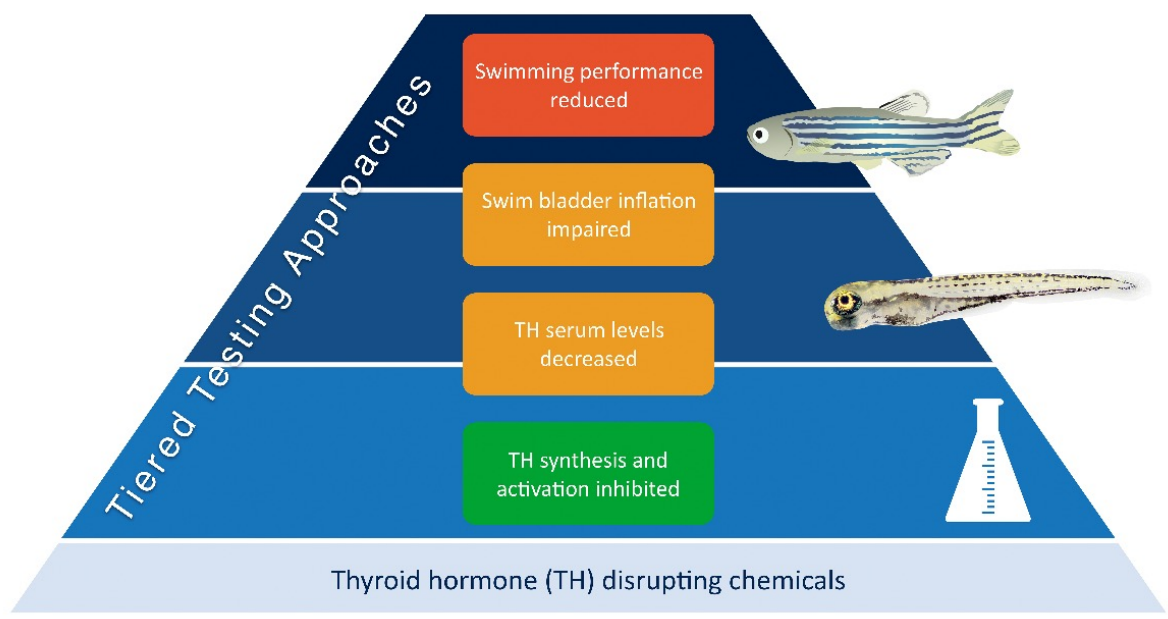
26 **Abstract**

27 A growing number of environmental pollutants are known to adversely affect the thyroid hormone
28 system, and major gaps have been identified in the tools available for the identification, and the
29 hazard and risk assessment of these thyroid hormone disrupting chemicals. We provide an example
30 of how the adverse outcome pathway (AOP) framework and associated data generation can address
31 current testing challenges in the context of fish early-life stage tests, and fish tests in general. We
32 demonstrate how a suite of assays covering biological processes involved in the underlying
33 toxicological pathways can be implemented in a tiered screening and testing approach for thyroid
34 hormone disruption, using the levels of assessment of the OECD's Conceptual Framework for the
35 Testing and Assessment of Endocrine Disrupting Chemicals as a guide.

36

37 **Keywords:** thyroid hormone disruption, tiered testing, adverse outcome pathway, fish, early-life
38 stages

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43 1. Background

44 Screening and testing programs for the assessment of endocrine-active chemicals are being
45 implemented throughout the world ¹. Endocrine disruption by chemicals is not restricted to the sex
46 hormone and reproductive systems, but also includes thyroid hormone disruption. Thyroid hormones
47 (TH) play a crucial role in the regulation of vertebrate development and homeostatic processes related
48 to growth and energy metabolism, and a growing number of high-profile environmental pollutants
49 has been shown to adversely affect the hypothalamic-pituitary-thyroid (HPT) axis ^{2,3}. While there are
50 many models and assays available for detecting chemicals that impact the hypothalamic-pituitary-
51 gonadal axis, such as estrogen and androgen receptor agonists and antagonists, major gaps have been
52 identified in the tools available for the hazard and risk assessment of HPT-active substances ^{4,5}. The
53 scientific community is therefore challenged with developing new or improved testing approaches to
54 evaluate TH disruption. A substance is considered as having endocrine-disrupting properties if (1) it
55 shows an adverse effect, (2) it has an endocrine mode of action, and (3) the adverse effect is a
56 consequence of the endocrine mode of action ⁶⁻⁸. A high level of uncertainty relative to the causal
57 relationship between mechanistic responses and apical, adverse outcomes is one of the main
58 limitations of the current test systems for the identification of endocrine-disrupting chemicals and for
59 evaluating endocrine hazard and risk ⁹. This is of particular importance in the case of TH disruption
60 since the adverse effects associated with disruption of the HPT-axis are often associated with general
61 biological processes (e.g., embryonic development, energy metabolism) that can be affected by many
62 different toxicological pathways, including mechanisms unrelated to the thyroid system. A second
63 limitation of current test methods is that they are costly, time-consuming, and animal intensive ¹⁰. To
64 address these various challenges, tiered testing approaches for the assessment of endocrine-active
65 chemicals have been developed by different countries and international organisations, in which lower
66 tier data (e.g., *in silico*, *in vitro* or *in vivo* data) are used to decide whether more elaborate, resource-
67 intensive higher tier *in vivo* tests are needed to demonstrate adverse apical effects. The U.S.
68 Environmental Protection Agency's (USEPA) Endocrine Disruptor Screening Program (EDSP) and the

69 Organisation for Economic Cooperation and Development (OECD) Conceptual Framework (CF) for the
70 Testing and Assessment of Endocrine Disrupting Chemicals ^{7, 11} are among the most important
71 examples of well-established tiered testing approaches ^{9,12}.

72 The adverse outcome pathway (AOP) framework ^{13,14} is, by design, well suited to directly support the
73 development of tiered testing approaches by providing evidence for the association between a
74 toxicological pathway perturbation and downstream responses ⁹. An AOP summarizes available
75 empirical evidence demonstrating the mechanistic, causal linkages leading from a molecular initiating
76 event (e.g., inhibition of an enzyme involved in TH synthesis) to an adverse apical outcome (e.g.,
77 reduced growth). Typically, an AOP is graphically depicted as a diagram which represents the assembly
78 of scientific evidence and mechanistic support underlying the toxicological pathway under
79 consideration. By integrating data across different levels of biological organization, the AOP
80 framework can thus provide support for the mechanistic link between an endocrine-active mechanism
81 detected using *in vitro* or lower tier *in vivo* assays, and potential apical effects measured in higher tier
82 *in vivo* tests ^{1,9}. The present paper provides an example of how the AOP framework and associated
83 data generation can address current TH disruption testing challenges in the context of fish early-life
84 stage assays, and fish assays in general. Although standardized and validated fish assays are routinely
85 used in environmental hazard and risk assessment, the current fish test guidelines lack endpoints that
86 are informative of TH disruption ⁷. Here, we build upon a recently developed AOP network linking
87 disruption of the HPT-axis in fish to impaired inflation of the swim bladder, leading to reduced
88 swimming performance and ultimately survival ^{15,16}. We demonstrate how assays covering essential
89 biological processes represented by the different key events of the AOP network can be implemented
90 in a tiered screening and testing approach for TH disruption in fish (see the caption of Figure 2 for
91 more information on the essentiality of key events). The levels of assessment as established by the
92 OECD CF are used as the primary guide for structuring our discussion.

93

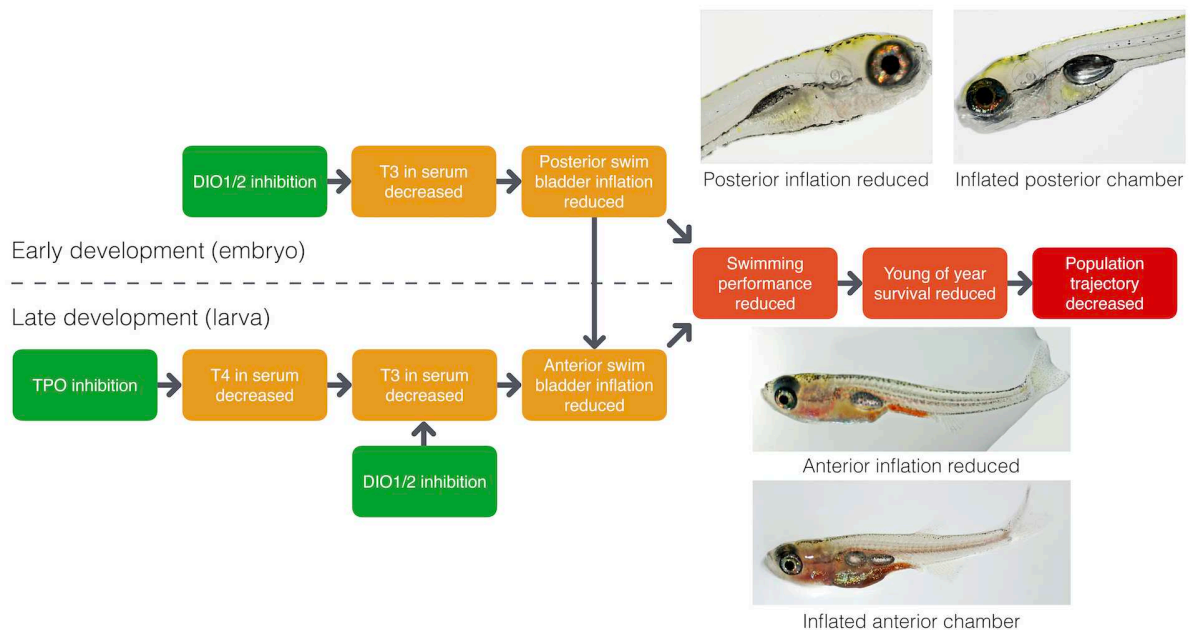
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95 2. Brief description of the AOP network

96 An AOP network is defined as an assembly of 2 or more AOPs that share one or more key events ¹⁵.

97 The AOP network used in this case example links TH disruption to impaired swim bladder inflation in
98 fish and is mainly based on experimental evidence from studies on zebrafish and fathead minnow
99 including chemical exposures, knockdowns, knockouts and rescue experiments ¹⁵⁻³². The swim bladder
100 is an internal gas-filled organ found in many bony fish species and typically consists of two gas-filled
101 chambers. The posterior chamber inflates during early development and contributes to the ability of
102 fish to control their buoyancy, while the anterior chamber inflates during late development and has
103 an additional role as a resonating chamber to produce or receive sound ³³. A large body of evidence is
104 available demonstrating the role of THs in swim bladder development and inflation. The AOP network
105 describes how decreased synthesis and/or decreased biological activation of THs leads to incomplete
106 or improper inflation of the swim bladder, leading to reduced swimming performance and ultimately
107 to reduced survival.

108 Specifically, the AOP network includes two distinct molecular initiating events, corresponding to the
109 inhibition of enzymes involved in the TH metabolism (Figure 1). Thyroperoxidase (Tpo) is the main
110 enzyme involved in TH synthesis in the thyroid gland, and deiodinase (Dio) 1 and 2 are mainly involved
111 in the activation of thyroxin (T4) to triiodothyronine (T3), the most biologically active form of TH.
112 Inhibition of Dio directly results in reduced serum T3 levels, while inhibition of Tpo leads to decreased
113 T4 levels and thus to lower availability of T4 for activation to T3, also resulting in decreased serum T3
114 levels. As such, reduced T3 levels are a point in the AOP network where different TH disrupting
115 mechanisms converge ¹⁵ and which is essential for the progression to different adverse outcomes,
116 depending on life-stage.



117

118 Figure 1. Graphical overview of an adverse outcome pathway (AOPs) network linking thyroperoxidase (TPO)
 119 inhibition and inhibition of deiodinase (DIO) 1/2 to reduced swim bladder inflation in fish and subsequent
 120 impacts on young of year survival. The AOPs relevant during different life stages are depicted above and below
 121 the dashed line ³².

122 Indeed, specific parts of the AOP network are relevant to different life stages (see Figure 1). The
 123 earliest life stages of teleost fish rely on maternally transferred THs to regulate certain developmental
 124 processes until embryonic TH synthesis is active ³⁴. As a result, early developmental processes that are
 125 dependent on THs, such as posterior swim bladder chamber inflation, appear to be less sensitive to
 126 inhibition of TH synthesis. On the other hand, when maternally derived THs are depleted during late
 127 development (larval stage), endogenous TH synthesis becomes more important and inhibition of Tpo
 128 interferes with proper inflation of the anterior swim bladder chamber ^{18, 19, 21, 28}. In all life stages
 129 however, the conversion of T4 into T3 is essential. Inhibition of Dio therefore impacts swim bladder
 130 inflation in both early and late developmental life stages ^{21-23, 28, 29}. The anterior chamber develops by
 131 budding out of the posterior chamber and thus failure to properly inflate the posterior chamber during
 132 early development directly impacts anterior chamber inflation during late development. Impaired
 133 swim bladder inflation results in reduced swimming performance ^{17, 18, 21, 22}, an adverse outcome that

134 can affect feeding behavior and predator avoidance, ultimately leading to lower survival probability
135 and population trajectory decline ²⁴.

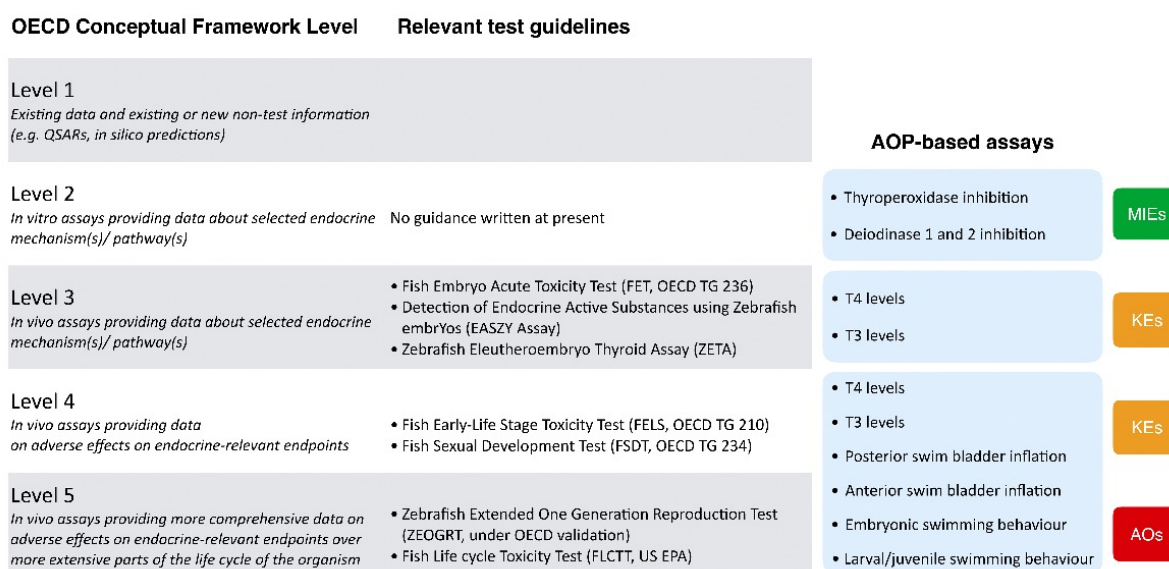
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137 3. Toward an AOP network-based tiered testing strategy

138 The OECD is an international organization promoting global cooperation to face modern day
139 challenges in various areas including human and environmental health. In 2002 (updated in 2012 and
140 2018), the OECD released the Conceptual Framework (CF) for Testing and Assessment of Endocrine
141 Disrupters that organizes current methods for screening and testing of endocrine-active substances
142 into 5 levels ¹¹. Level 1 of the CF relies on existing data and quantitative structure–activity relationship
143 (QSAR) or non-test information to predict the endocrine-active potential of chemicals (Figure 2). Level
144 2 (*in vitro*) and Level 3 (*in vivo*) assays inform whether a substance can interact with endocrine
145 pathways. These assays can be used to screen for possible endocrine activity but are typically limited
146 in their ability to capture all existing endocrine mechanisms and in the observation of adverse apical
147 effects. Level 4 is comprised of *in vivo* assays that provide data on endocrine-relevant adverse apical
148 effects and are typically responsive to more than one endocrine mode of action. Finally, Level 5 assays
149 include full life-cycle tests and multigenerational studies providing more comprehensive data on
150 adverse effects over more extensive parts of the life cycle. Level 4 and Level 5 assays are focused on
151 observing adverse effects and can be used for evaluating both the actual endocrine disrupting
152 properties of substances and their potential risk. It should be noted that within the context of the CF,
153 entering and exiting at all levels is possible and depends on the nature of existing information and
154 needs for testing and assessment ⁷. The USEPA EDSP uses a two-tiered approach in which Tier 1
155 screening data, corresponding to CF Levels 1-3, are used to identify substances that have the potential
156 to interact with endocrine systems and Tier 2 identifies and characterizes any adverse endocrine-
157 related apical effects, corresponding to CF Levels 4-5.

158 In 2018, the OECD published an updated version of Guidance Document 150, *Standardised Test*
159 *Guidelines for Evaluating Chemicals for Endocrine Disruption* ⁷. This document, originally published in

160 2012, is intended to provide guidance for evaluating chemicals using standardised test guidelines
 161 within the context of the OECD CF. The guidance document provides advice on how to use and
 162 interpret the outcome of individual tests/assays and attempts to address the need for a causal linkage
 163 between likely mechanisms of endocrine action and resulting apical effects. It also provides a list of
 164 assays, including those for the assessment of TH disruption, that could be valuable additions to
 165 existing test guidelines but for which currently no formal test guidelines are available. The AOP
 166 network described here provides a mechanistic basis for adding a suite of TH disruption-specific assays
 167 and relevant additional endpoints (see list of AOP-based assays in Figure 2) for a number of existing
 168 fish test guidelines.



169
 170 Figure 2. Overview of assays aligned with the thyroid hormone disruption AOP network and how they could be
 171 used in a tiered testing strategy based on the Organisation for Economic Cooperation and Development (OECD)
 172 Conceptual Framework ^{7, 11}. Only test guidelines that are directly relevant to zebrafish and/or fathead minnow
 173 early-life stages, on which the current AOP network is based, are mentioned. Level 1 is mentioned for
 174 completeness. MIE, KE and AO are AOP-specific terms ³⁵. MIE: molecular initiating event, the point where a
 175 chemical directly interacts with a biomolecule to create a perturbation, depicted in green. KE: key event, a
 176 measurable change in biological state that is essential, but not necessarily sufficient for the progression from a
 177 defined biological perturbation toward a specific adverse outcome, depicted in orange. AO: adverse outcome,

178 measured at a level of organization that corresponds with an established protection goal and/or is functionally
179 equivalent to an apical endpoint measured as part of an accepted guideline test, depicted in red.

180

181 3.1. *In vitro* assays for thyroid activity screening

182 There are currently no internationally validated test guidelines for *in vitro* assays to screen for thyroid-
183 active substances at Level 2 of the CF (Figure 2). Several international efforts have, however, assessed
184 the availability and readiness of *in vitro* screening assays for thyroid-active chemicals^{3,36}. Important
185 progress has recently been made on the development of assays to evaluate reduced TH synthesis via
186 inhibition of Tpo activity³⁷ and iodide uptake³⁸, reduced TH (in)activation by inhibition of deiodinase
187 activity³⁹, and inhibition of cellular TH uptake⁴⁰. Several of these assays have been applied to large
188 chemical libraries and are currently being added to the USEPA Toxicity Forecaster (ToxCast™)
189 program, a chemical prioritization effort that uses a suite of high-throughput screening assays to rank
190 and prioritize chemicals for future testing, thereby aiding in efficient management and regulation of
191 environmental contaminants. Recently, the extent to which available high throughput screening
192 assays cover the known molecular targets for TH disruption across vertebrates was evaluated. These
193 molecular interactions were then linked to downstream events and adverse outcomes based on a
194 cross-species TH disruption AOP network⁴¹. In July 2017, the Joint Research Centre EU Reference
195 Laboratory for alternatives to animal testing (JRC EURL ECVAM) launched a validation study to assess
196 a battery of 17 *in vitro* screening methods covering a series of TH disrupting modes of action.
197 Consequently, the scope of assays available for Level 2 of the CF is expected to continue to grow in
198 the near future.

199 The AOP network links molecular interactions measured in *in vitro* Tpo and Dio inhibition assays with
200 altered TH levels and downstream adverse *in vivo* effects in fish. Here, we use it in a tiered testing
201 strategy to guide the selection of suitable assays and endpoints for the evaluation of adverse *in vivo*
202 effects. Specifically, a positive result in the *in vitro* Tpo and/or the Dio inhibition assay could trigger

203 fish *in vivo* testing to confirm the occurrence of downstream events along the AOP network including
204 altered TH levels, impaired swim bladder inflation, and altered swimming performance (see sections
205 3.2 and 3.3). An initial validation case study showed that adverse swim bladder effects could be
206 predicted along the AOP network based on *in vitro* Dio inhibition data ²². The further development of
207 such predictive approaches, including expanding the quantitative understanding of the relationships
208 in the AOPs where possible ⁴², would significantly reduce the need for *in vivo* testing in the future.

209

210 3.2. *In vivo* assays for thyroid activity screening

211 Currently, the only non-mammalian *in vivo* assays assessing thyroid-specific endpoints at Level 3 of
212 the CF use amphibians. The Amphibian Metamorphosis Assay (AMA, OECD TG 231, US EPA OPPTS
213 890.1100) is the most widely-used assay for detecting HPT-active substances, but was recently
214 complemented with the *Xenopus* Eleutheroembryonic Thyroid Assay (XETA, TG 248). None of the
215 current CF Level 3 fish assays include thyroid-specific endpoints.

216 Fish and amphibian embryo assays have added value for screening purposes compared to *in vitro*
217 assays due to the increased biological relevance gained from using a model organism with an intact
218 HPT axis and ongoing, complex development. In this context, the Fish Embryo Acute Toxicity (FET) test
219 (OECD TG 236) with the addition of TH measurements as thyroid-specific endpoints could be a
220 valuable Level 3 screening assay for TH activity. It should be noted however that since collecting blood
221 from early life stages of fish is often not feasible, whole body TH measurements are typically used as
222 a proxy for serum TH levels ²¹. Similarly, TH measurements could be carried out as part of the “EASZY
223 Assay” (*Detection of Endocrine Active Substance, acting through estrogen receptors, using transgenic*
224 *Zebrafish embryos*), for which an OECD test guideline was recently drafted. The importance and
225 relevance of determining altered TH levels as an indicator of endocrine activity in *in vivo* assays for TH
226 disrupter screening and testing has already been acknowledged ^{4, 7}. The AOP network further
227 highlights the critical nature of altered TH levels as a point of convergence for several TH disruption

228 mechanisms and essential step in the progression towards an adverse outcome. The ZETA (Zebrafish
229 Eleutheroembryo Thyroid Assay) quantifies intrafollicular T4 content as an indirect measurement of
230 TH synthesis in 5 day old zebrafish embryos. It is a first example of a thyroid-specific fish test that has
231 been proposed and is currently being explored as part of the JRC EURL ECVAM validation effort ^{36, 43}.
232 Viable methods for directly measuring altered whole body TH levels (T4, T3) in fish embryos have
233 recently been developed ^{18, 19, 21, 23}. Today, the addition of TH measurements to the FET test, and
234 possibly the ZETA and EASZY Assay, for detecting TH disruption screening has therefore become both
235 sensible and achievable. An accurate assessment of posterior chamber inflation and swimming
236 performance however cannot be reliably carried out within the context of the FET test, which has a
237 duration of 96 hours, since the posterior chamber of zebrafish inflates around 120 hours post-
238 fertilisation. Also, many endocrine (e.g., delayed development) and non-endocrine or indirect
239 endocrine (e.g., altered feeding behavior, increased energy expenditure) mechanisms negatively
240 impact growth rate, thereby potentially further delaying posterior chamber inflation. Therefore, we
241 only suggest the addition of TH measurements, and not assessment of swim bladder inflation, to
242 existing fish embryo tests for TH activity screening.

243 Importantly, assays using fish or amphibian embryos are considered non-animal methods in many
244 parts of the world. For example, non-mammalian vertebrate embryos are not protected until the stage
245 of free-feeding under the current EU legislation on the use of laboratory animals ⁴⁴. In a tiered testing
246 approach, *in vitro* and non-animal assays (e.g., fish and amphibian embryo assays) could reduce the
247 need for *in vivo* testing. Naturally, the limitations that have been considered in the debate on the
248 regulatory acceptance of the FET test within the context of the REACH legislation should be taken into
249 account. These include the presence of a chorion during the first few days of the test which may
250 function as a barrier to some chemicals, and the limited xenobiotic metabolism capacity compared to
251 later life stages ⁴⁵.

252

253 3.3. *In vivo* assays for thyroid hormone disruption testing

254 There are two non-mammalian assays, one with an amphibian and one with an avian species, at Levels
255 4 and 5 of the CF and Tier 2 of the EDSP that have thyroid-specific endpoints (OECD TG 241, US EPA
256 OCSPP 890.2100). Several fish assays with zebrafish and/or fathead minnow early-life stages are also
257 listed as Level 4 and 5 tests in the CF (Figure 2): the Fish Early Life Stage Toxicity (FELS) Test (OECD TG
258 210, Level 4), Fish Sexual Development Test (FSDT, OECD TG 234, Level 4), Zebrafish Extended One-
259 Generation Reproduction Test (ZEOGRT, draft OECD TG, Level 5), and Fish Life Cycle Toxicity Test
260 (FLCTT, US EPA OPPTS 850.1500, Level 5). These assays all assess endpoints that are potentially
261 sensitive to, but not necessarily diagnostic of TH disruption (i.e., general adverse effects such as
262 reduced growth that might respond to TH disruption but can also be affected by other toxicological
263 pathways). It has been suggested that new, specific endpoints could be added to these existing test
264 guidelines to increase their diagnostic value for the assessment of TH disruption⁴. Recently, addition
265 of thyroid-related endpoints in OECD fish test guidelines such as the FET and FSDT was included in the
266 OECD's Work Plan for the Test Guidelines Programme (project 2.64).

267 Neither swim bladder inflation nor swimming performance are in themselves endpoints specific to TH
268 disruption since they can be affected through various mechanisms. The strength of an AOP-based
269 approach, however, lies in linking these adverse outcomes to an endocrine mechanism, providing
270 biologically plausible support that the adversity is effectively the consequence of the endocrine
271 mechanism. In the case of TH disruption in fish, the strong evidence for the relationship between
272 reduced TH levels and impaired swim bladder inflation is crucial in this respect^{18,21}. Measurements of
273 altered TH levels thus increase the diagnostic value of general endpoints such as growth and swim
274 bladder inflation by placing these endpoints in a TH disruption context based on the causal linkages in
275 the AOP network. Specifically, the combination of whole-body TH measurements (T4, T3) and the
276 assessment of swim bladder inflation (both chambers) and swimming performance could be included
277 as an AOP-based suite of endpoints in any test guideline using zebrafish or fathead minnow early-life
278 stages. This includes the FELS test, FSDT, ZEOGRT and FLCT. In the European Union, the FELS test is

279 the most important standard ecotoxicological data requirement for industrial chemicals (REACH), and
280 active substances in biocides (EU 528/2012 ⁴⁶) and plant protection products (EU 1107/2009 ⁴⁷).
281 Increasing the diagnostic value of the FELS test for the detection of TH disrupters may therefore
282 significantly increase the efficiency of chemical safety evaluation in terms of cost and use of animals.
283 Future development of new AOPs linking TH disruption to adverse effects that are already being
284 assessed as a part of these test guidelines (e.g., growth) may further improve the significance of these
285 endpoints.

286

287 4. Considerations for the further development and application of the AOP network

288 4.1. Expanding the domain of applicability

289 The TH disruption AOP network to which the assays discussed in this case example are aligned (Figure
290 2) is included in the OECD AOP development programme workplan as Project 1.35 (*The AOP on*
291 *thyroperoxidase and/or deiodinase inhibition leading to impaired swim bladder inflation in fish during*
292 *early-life stages*) and is mainly based on studies using zebrafish and fathead minnow. A first logical
293 step in expanding the applicability of the AOP network is to assess its relevance to other species that
294 are frequently used in existing fish test guidelines, such as the Japanese rice fish (also known as the
295 medaka), three-spined stickleback and rainbow trout. Second, since TH disruption can be caused
296 through many different mechanisms (e.g., iodine uptake inhibition, increased liver TH clearance), the
297 AOP network related to effects in fish could be expanded to include a larger variety of molecular
298 initiating events ⁴¹. Further, several other endpoints and biomarkers that have been shown to respond
299 to impaired thyroid function and/or altered TH levels could be added, including gene expression, eye
300 development (e.g., size, pigmentation, retina histology), skin pigmentation, scale development,
301 impaired fin development, and thyroid histopathology assessing thyroid follicle morphology e.g., using
302 staining techniques or transgenic fish ^{30, 48, 49}. The development of AOPs covering these adverse effects
303 would facilitate the assessment of their specificity and sensitivity in the context of TH disruption. In
304 addition, linking these AOPs to the existing AOP network would help expand the life stage applicability

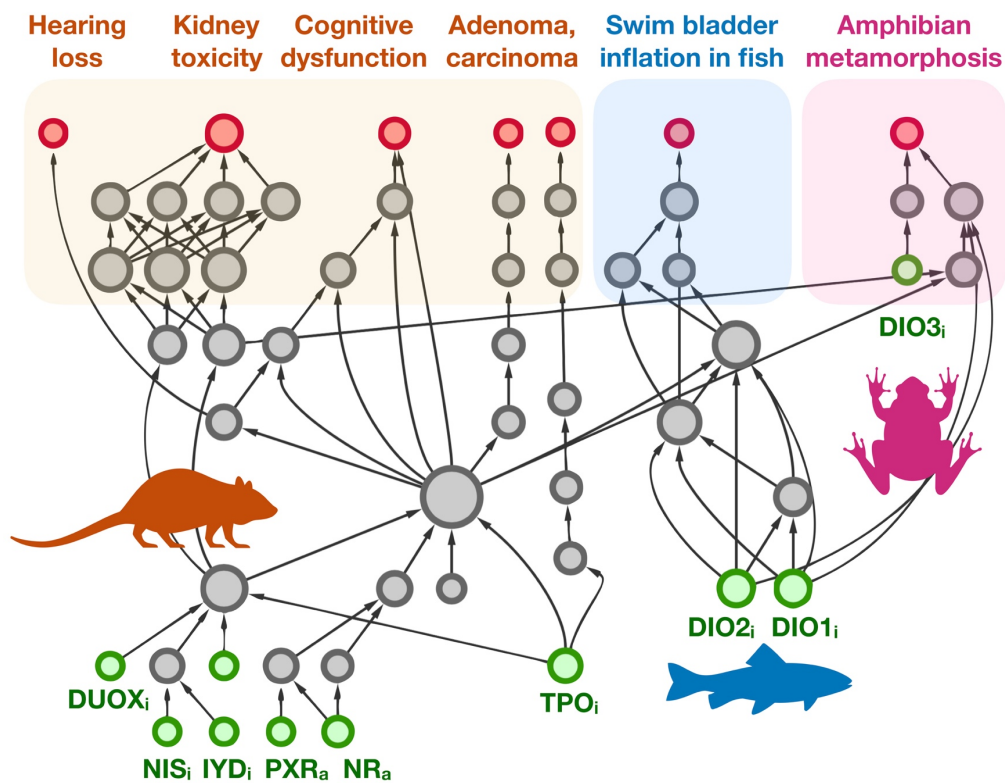
305 from early-life stages to juveniles and reproductively active, adult fish for a range of species. Such
306 efforts would make the AOP network relevant to a number of additional fish test guidelines, including
307 the fish short-term reproduction assay (OECD TG 229), the 21-day fish assay (OECD TG 230), the
308 androgenised female stickleback screen (OECD GD 148), the juvenile medaka anti-androgen screening
309 assay (draft OECD GD) and the rapid androgen disruption adverse outcome reporter assay (draft OECD
310 TG) at Level 3 of the CF, and the medaka extended one-generation reproduction test (OECD TG 240)
311 at Level 5.

312 Tiered testing strategies for the evaluation of TH disrupting properties are being developed in parallel
313 for human and environmental health^{3,7}. Evaluation of the hazards and risks of chemicals derived from
314 tests for human health effects and environmental effects are largely separate processes, and sharing
315 of data is uncommon. Human toxicology and ecotoxicology have historically used different models,
316 terminologies and interpretation approaches. The AOP framework facilitates the application of similar
317 strategies for developing assays and using them in a unified weight of evidence analysis. This provides
318 opportunities for effectively bridging the gap between these two disciplines⁵⁰⁻⁵². A relatively large
319 number of AOPs related to TH disruption is currently being developed in the AOP-Wiki⁵³, involving a
320 variety of species and taxonomic groups. Two AOPs focusing on TH disruption (leading from
321 thyroperoxidase and sodium iodine transporter inhibition to neural outcomes in rodents) have been
322 endorsed and published by the OECD so far^{54,55}. Based on the fact that well-known targets along the
323 HPT-axis are highly conserved among vertebrate classes^{56,57}, a cross-species TH disruption AOP
324 network covering mammals, fish and amphibians is emerging from these datasets (conceptually
325 visualized in Figure 3)^{15,41}. The underlying AOPs and their interrelationships were recently described
326 in detail to support the use of *in vitro* assays for the evaluation of TH disruption⁴¹. Further
327 development and biological validation of this larger AOP network can form the basis of a harmonized,
328 integrated approach to testing and assessment of TH disrupters addressing both human and
329 environmental health. Finally, while we presently focus on TH disrupting activity and fish, tiered
330 testing strategies for other modes of endocrine disruption can in principle also be informed by

331 emerging AOPs and AOP networks including adverse effects with complex and multifactorial origins

332 ⁵⁸.

333



334

335 Figure 3. Graphical representation of a cross-species AOP network, present in the AOP-Wiki (date accessed: June
336 3, 2020), that links molecular initiating events (green circles) through impacts on circulating thyroid hormone
337 levels, to adverse outcomes (red circles) in mammals, fish, and/or amphibians. Some of the AOPs in this AOP
338 network are supported by a large amount of data that have been published in the peer-reviewed literature,
339 while others are putative AOPs that are still under development. This figure therefore conceptually illustrates
340 an AOP network approach across taxonomic groups but does not make any assumptions about the biological
341 validity of the underlying AOPs. For that reason, the identity of intermediate key events has not been specified.
342 AOPs, and hence the depicted AOP network, may be subject to change before they are formally finalized. DUOX:
343 dual oxidase, NIS: sodium-iodide symporter, IYD: iodotyrosine deiodinase, PXR: pregnane X receptor, NR:
344 hepatic nuclear receptor, TPO: thyroperoxidase, DIO (1,2,3): iodothyronine deiodinase (1,2,3), i: inhibition, a:
345 activation. <https://aopwiki.org/aops/xxx> (xxx: AOP numbers 8, 42, 54, 119, 128, 134, 155, 156, 157, 158, 159,
346 162, 175, 176, 188, 189, 190, 191, 192, 193, 194).

347

348 4.2. Is the AOP network “Fit for Purpose”?

349 In the present paper we have illustrated how the AOP framework and associated data can be used to
350 address testing challenges in the context of the use of fish-based test guidelines to detect perturbation
351 of the thyroid hormone axis, an area of emphasis for multiple regulatory programs. A perceived
352 challenge to the use of AOPs and AOP networks for regulatory applications is that they are never
353 finished nor complete. Important additional molecular initiating events, key events, adverse effects,
354 and associated physiological processes, may not (yet) be captured by any given AOP (network). This
355 could potentially lead to a biased focus on specific pathways, mechanisms and processes, instead of
356 providing a broader and more holistic consideration of all of the available mechanistic evidence⁵⁹. In
357 the case of our thyroid AOP network, important and well-known mechanisms affecting TH
358 concentrations (e.g., iodine uptake inhibition, increased liver TH clearance) are indeed not yet
359 included.

360 The critical question is at what point an AOP conveys knowledge that can help to support the use of
361 available, or readily produced, data for decision-making. To the extent that the answer will vary with
362 the nature of the decision, the question is: when is an AOP (network) fit for a particular purpose?
363 Although they are indeed so-called “living documents” that can evolve over time, AOPs are
364 nonetheless useful at different stages of completeness depending on the intended application. For
365 example, if the purpose of a regulatory activity/program is prioritization, less evidence and less
366 confidence may be required than if the purpose is quantitative risk assessment, where a higher level
367 of scientific confidence or even sophisticated quantitative understanding may be required⁶⁰. Specific
368 criteria (e.g., the type and level of AOP complexity and confidence in the AOP, as well as external
369 review and assay validation) have recently been proposed to examine when AOPs, AOP networks, and
370 associated tools are fit for purpose in different regulatory and risk assessment contexts⁶¹. Ultimately,
371 although individual AOPs will often continue to be refined over time and associated AOP networks will

372 continue to broaden the toxicological space that can be addressed, even an initial AOP (network) can
373 be useful in a decision-making process, providing that it demonstrably increases confidence in a
374 decision ⁶⁰.

375 Although knowledge and data gaps most certainly remain in our current thyroid AOP network, the
376 current level of understanding is sufficient to support selection of assays for TH disruption, including
377 those useful for assessing important *in vivo* apical effects in fish early-life stages ²¹. Further expanding
378 toxicological space (in terms of initiating events) can certainly increase the domain of applicability of
379 this AOP network (see section 4.1). At the same time, there could be a concern that such an approach
380 could lead to an increasingly large number of assays, potentially complicating and even slowing down
381 risk assessments by introducing an ever-growing list of endpoints to evaluate. In most tiered testing
382 approaches however, data do not necessarily need to be collected at all tiers. Data requirements
383 depend on the availability and nature of existing information and the needs for testing and
384 assessment, not the list of all potentially relevant information. The addition of TH disruption
385 assays/endpoints to existing test guidelines significantly improves the capacity of these guidelines to
386 evaluate TH disruption by providing an improved level of flexibility in selecting assays corresponding
387 to specific information requirements, while at the same time reducing the need for additional testing.
388 Both in the US and the EU it is becoming increasingly evident that existence of such “fit for purpose”
389 AOPs accelerates the regulatory process through enabling use of alternative data sources such as
390 computational, molecular, and *in vitro* tools.

391 Finally, an important consideration in the context of assessing endocrine-active chemicals, is the
392 necessity of establishing a causal or plausible relationship between changes in endocrine signaling (a
393 molecular initiating event) and an adverse outcome for supporting regulatory decision-making. The
394 development of AOPs such as those in the thyroid AOP network explicitly addresses the biological
395 plausibility of the link between an adverse effect and endocrine activity. As such, this directly
396 addresses the scientific criteria for the identification of endocrine-disrupting chemicals as outlined in
397 for example the EU biocidal products (2017/2100 ⁶²) and plant protection products (2018/605 ⁶³)

398 regulations. Some legislative initiatives and risk assessment strategies, however, do not necessarily
399 require data at different levels of biological organization nor an explicit link between an adverse effect
400 and a specific endocrine disruption mechanism. In these instances, data documenting an adverse
401 endocrine specific effect, such as altered sex ratio, are sufficient for regulatory decision-making. This
402 approach is, however, not straightforward in the case of TH disruption since adverse outcomes are
403 often non-specific and could also be caused by other endocrine and non-endocrine mechanisms.
404 Hence, AOP-based approaches are helpful in such scenarios by placing the observed effects in a TH
405 disruption context based on the linkages in the AOP network.

406

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