



30 proteins resulting in cellular apoptosis and/or necrosis. The main route of exposure for  $\beta$ -olefinic  
31 alcohols is oral with direct absorption from the upper gastrointestinal tract. They are distributed  
32 unbound in the blood and are subsequently readily enzymatically oxidised, especially in the liver,  
33 to form reactive metabolites.

34 The category considered in this case study was confined to selected subclasses of  $\beta$ -olefinic  
35 alcohols from C3 to C6. In addition to the structurally unique 2-propen-1-ol (i.e., 1-propen-3-ol;  
36 allyl alcohol), the category included: straight-chain primary alcohols (e.g., 2-alken-1-ols),  
37 straight-chain secondary alcohols (e.g., 1-alken-3-ols and 3-alken-2-ols), branched primary  
38 alcohols (e.g., 2-methyl-2-alken-1-ols and 3-methyl-2-alken-1-ols) and branched secondary  
39 alcohols (e.g., 3-methyl-3-alken-2-ols and 4-methyl-3-alken-2-ols). There were only 90 day  
40 repeated-dose toxicity test results for 2-propen-1-ol and 3-methyl-2-buten-1-ol. The reported 90-  
41 day oral repeated dose toxicity No Observed Adverse Effect Levels (NOAELs) in rats for 2-  
42 propen-1-ol were 6 mg/kg body weight (bw)/d in males based on increase in relative weight of  
43 liver and 25 mg/kg bw/d in females based on bile duct hyperplasia and periportal hepatocyte  
44 hypertrophy in the liver. The 90-day oral repeated dose NOAELs for 3-methyl 2-buten-1-ol in rat  
45 were reported based on the decreased food and water consumption: 65.4 mg/kg bw/day in males  
46 and 82.1 mg/kg bw/day in females.

47 Compounds representing each of five sub-structural groups of  $\beta$ -olefinic alcohols were tested in  
48 an *ex vivo* model, the 2-hr rat isolated perfused liver assay, are consistent with metabolic  
49 activation to soft electrophiles. Specifically, all tested primary and secondary  $\beta$ -olefinic alcohols  
50 exhibit a dramatic reduction (90-99%) in glutathione (GSH) as compared to controls. *In chemico*  
51 reactivity data, in the form of the concentration eliciting a 50% reduction in free GSH after 2  
52 hours exposure for selected  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds (i.e., potential reactive  
53 metabolites of  $\beta$ -olefinic alcohols) also support the applicability domain of this chemical  
54 category. All olefinic  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds such as those derived from hepatic  
55 metabolism of primary and secondary olefinic  $\beta$ -unsaturated alcohols readily react with GSH.  
56 Specifically,  $\alpha$ ,  $\beta$ -unsaturated carbonyl derivatives of straight-chain alcohols: 1-alken-3-ols, 2-  
57 alken-1-ols exhibit 2-hour  $RC_{50}$  values between 0.05 and 0.40 mM, while those of branched  
58 alcohols: 2-methyl-2-alken-1-ols, 3-methyl-2-alken-1-ols, 3-methyl-3-alken-2-ols and 4-methyl-  
59 3-alken-2-ols exhibit  $RC_{50}$  values between 12-22 mM.

60 A human cell-based hepatic organoid *in vitro* model was used to assess fibrosis of selected  $\beta$ -  
61 unsaturated alcohols. 2-propen-1-ol, 2-buten-1-ol, 1-buten-3-ol, 3-methyl-2-buten-1-ol, as well  
62 as the  $\beta$ -acetylenic alcohols 2-methyl-3-butyn-2-ol and 2-propyn-1-ol were evaluated. Briefly,  
63 mRNA expression of the hepatic stellate cells (HSC) activation markers COL1A1, COL3A1 and  
64 LOXL2 were checked in the hepatic organoids upon exposure to the different alcohols. Strong  
65 induce (i.e., >3-4 fold up-regulation) of at least two out of three HSC markers was observed with  
66 the four olefinic alcohols. This pattern was not observed with the two  $\beta$ -acetylenic alcohols.

67

68 The *in vivo*, *ex vivo*, *in vitro* and *in chemico* data support the read-across premise. Specifically,  
69 all the category members are highly likely 1) transformed to metabolites having the same  
70 mechanism of electrophilic reactivity (i.e., Michael acceptors), 2) metabolized via the same  
71 pathway (i.e., ADH-mediated), and 3) to have rates of transformation sufficient so the reactive  
72 metabolites are the definitive toxicant for repeated-dose. However, the category members have  
73 metabolites with different reactive potencies (i.e., GSH RC50 values). In order to reduce the  
74 uncertainty associated with reactivity, the category is sub-categorised into straight-chained and  
75 branched derivatives. With acceptable uncertainty, the rat oral 90-day repeated-dose toxicity data  
76 for 2-propen-1-ol may be read across to fill data gaps for straight-chained analogues and the rat  
77 oral 90-day repeated-dose toxicity data for 3-methyl-2-buten-1-ol may be read across to fill data  
78 gaps for branched analogues.

79

## 80 **Introduction**

81 The basis for a toxicological read-across are chemicals which are similar in molecular structure,  
82 display similar chemical properties and in so doing have similar toxicokinetic and toxicodynamic  
83 properties. As a consequence, experimentally-derived properties from one compound, the source  
84 chemical, can be read across to fill the data gap for a second compound, the target chemical,  
85 which has been shown to be similar. This case study has been designed to illustrate specific  
86 issues associated with the read-across approach and stimulate discussion on how to best address  
87 them. It is not intended to be related to any regulatory discussions on this group of chemicals.

88 One of the crucial issues in toxicological read-across is addressing substances that are altered  
89 metabolically to more toxic species (Berggren et al., 2015). The toxic metabolites of these

90 indirect acting toxicants may be identical or different in structure within a group. In the former  
91 case, after *in vivo* dosing the various organs and systems of the animal are exposed to the same  
92 metabolite, thus toxicodynamic similarity may be assumed. In the latter case, after dosing the  
93 various organs and systems are exposed to metabolites with minor differences in chemical  
94 structure which may or may not elicit the same toxicological effects. This second situation adds  
95 complexity to the read-across justification because of the burden of establishing both  
96 toxicokinetic and toxicodynamic similarity.

97 In the present study, the “Strategy for Structuring and Reporting a Read-Across” (Schultz et al.,  
98 2015) was applied to undertake this proof-of-concept study. The read-across scenario is chemical  
99 similarity as a result of metabolism to the same toxic metabolite. Therefore, the parent  
100 compounds are not the ultimate toxicants; rather, the metabolite(s) which acting by a common  
101 mode of toxic action are considered as the definitive toxicants.

102 The present case study is for olefinic  $\beta$ -unsaturated alcohols where the read-across based on *in*  
103 *vivo* data was supplemented by appropriate *ex vivo*, *in vitro*, *in chemico* and classic structure-  
104 activity relationship information. The goal was to reduce uncertainty associated with the *in vivo*  
105 prediction by the increased weight-of-evidence provided by the alternative methods data, which  
106 make reduce uncertainty and hence potentially make the prediction more acceptable in the  
107 regulatory context.

108 Olefinic  $\beta$ -unsaturated alcohols vary in molecular structure with these structural variations  
109 impacting on reactivity and toxicity. While all olefinic alcohols contain a C=C moiety, they can  
110 be sub-divided further according to whether the olefinic alcohol is beta-, or non-beta- oriented to  
111 the hydroxyl group. Additionally, they can be subdivided based on whether the hydrocarbon  
112 moiety is straight-chain or branched and whether the alcohol is primary, secondary or tertiary.  
113 These subdivisions are important for the toxicity effect as the overall structure of the parent  
114 alcohol determines the metabolic pathway and the specific metabolite formed. Only primary and  
115 secondary  $\beta$ -olefinic alcohols can undergo first step oxidation to  $\alpha$ ,  $\beta$ -unsaturated aldehydes or  $\alpha$ ,  
116  $\beta$ -unsaturated ketones, respectively (Bradbury and Christensen, 1991; Schwöbel et al., 2011).  
117 While all of these oxidative metabolites have the capability to be reactive with biological  
118 macromolecules as Michael acceptors, they exhibit different levels of reactivity and toxicity  
119 (Mekenyan et al., 1993; Schultz et al., 2007; Yarbrough and Schultz, 2008).

120 Among the  $\beta$ -olefinic alcohols, 2-propen-1-ol (1-propen-3-ol; allyl alcohol) is the best studied  
121 chemical with the greatest quantity of toxicological data and information. There is strong  
122 evidence that the mode of toxic action for 2-propen-1-ol involves metabolism via cytosolic  
123 alcohol dehydrogenase (ADH) to acrolein, an electrophile which elicits covalent cellular effects  
124 (Badr et al., 1986). Overall, currently available data suggest that the kidney, liver and lung are  
125 potential targets for 2-propen-1-ol, following repeated oral or inhalation exposure. In oral  
126 repeated-dose toxicity testing, exposure to 2-propen-1-ol may leads to liver fibrosis (Atzori et al.,  
127 1989; Jung et al., 2000). Liver fibrosis is a reversible response to acute or chronic hepatocyte  
128 injury (Bataller and Brenner, 2005; Lee and Friedman, 2011; Trautwein et al., 2015). The  
129 mechanistic rationale is that the parent alcohol is relatively non-toxic however its metabolite  
130 acrolein, an  $\alpha$ ,  $\beta$ -unsaturated aldehyde, is a Michael-type soft electrophile. Such electrophiles  
131 preferentially covalently interact with thiol groups in proteins leading to necrotic or apoptotic  
132 cell death (Strubelt et al., 1999). During the *in vivo* response to cell death, stellate cells in the  
133 liver are activated, for example by transforming growth factor beta (TGF- $\beta$ ) and connective  
134 tissue is formed (Friedman, 2008).

135 Historically, the hepatotoxic action of 2-propen-1-ol to rodent liver is related to oxidative  
136 metabolism into acrolein, which in turn can bind covalently to proteins in periportal hepatocytes  
137 (Reid, 1972; Serafini-Cessi, 1972). The covalent binding of acrolein to hepatic proteins was also  
138 confirmed by a study on radiolabelled  $^{14}\text{C}$  2-propen-1-ol and its deuterated derivative (Patel et  
139 al., 1983). Two-propen-1-ol exerts a dose-dependent toxicity on cells, which is inversely related  
140 to cellular glutathione (GSH) (Ohno et al., 1985). After severe depletion of GSH, the reactive  
141 metabolite of 2-propen-1-ol – acrolein - can bind to essential sulfhydryl groups in the cellular  
142 macromolecules, leading to cellular damage (Atzori et al., 1989). The toxicity of 2-propen-1-ol  
143 can be prevented by inhibitors of ADH and augmented by the aldehyde dehydrogenase (ALDH)  
144 inhibitor disulfiram (Ohno et al., 1985).

145 *In vivo* oral exposure to 2-propen-1-ol leads to periportal necrosis and subsequent connective  
146 tissue development (Badr et al., 1986; Jung et al., 2000). Histopathological studies of 2-propen-  
147 1-ol exposed to repeatedly dosed rat livers showed signs of necrosis around the portal triad, with  
148 relatively little damage around the central vein. In addition, ductular proliferation, connective  
149 tissue accumulation and cirrhosis are evident.

150 3-methyl-2-buten-1-ol is far less studied (ECHA Study report 2002; OECD 2003; Mc Ginty et  
151 al., 2010) with fewer toxicological data. In 90-day drinking water exposed rats, substance-related  
152 effects were seen at the high and mid dose level (i.e., 65.4 and 243.8 mg/kg bw/day for male and  
153 21.0, 82.1 and 307.2 mg/kg bw/day for female). Specifically, in the mid dose groups, decreased  
154 food and water consumption in male rats and reduced water consumption in female rats was  
155 noted. Body weight was significantly impaired at the high dose in both sexes. In the mid and  
156 high dose, the mean absolute liver weights in male rats were significantly decreased, but not the  
157 relative liver weights. No other significant treatment related changes were observed.

158

## 159 **Read-Across Exercise**

### 160 **1. Statement target substance(s) and the regulatory endpoint(s) that is to be read across.**

161 There are no *in vivo* repeated-dose data for the vast majority of  $\beta$ -olefinic alcohols. However,  
162 there are strong and consistent *ex vivo* data suggesting many of these chemicals are metabolically  
163 transformed, especially in the liver, to reactive electrophilic toxicants which react in a  
164 mechanistically similar manner to acrolein, the reactive metabolite of 2-propen-1-ol. Hence, an  
165 evaluation was conducted to determine suitability of 2-propen-1-ol [107-18-6] as a read-across  
166 analogue for other  $\beta$ -olefinic alcohols, especially unbranched compounds.

### 167 **2. Description of the analogues or members of the category.**

#### 168 2.1. Premise

169 The hypothesis for this read-across case study is:

- 170 • *Primary and secondary  $\beta$ -olefinic alcohols of short chain length (i.e., C3 to C6) are*  
171 *indirect-acting toxicants (i.e., metabolism is critical factor in toxicity) with the same*  
172 *covalent mechanism of action (i.e., Michael addition electrophilicity) and similar*  
173 *reactive potency.*
- 174 • *Within the C3 to C6 derivatives, C-atom chain length or branching does not significantly*  
175 *affect oral bioavailability.*
- 176 • *While all short-chain  $\beta$ -olefinic alcohols are rapidly and nearly completely absorbed*  
177 *from the gut; only the primary and secondary alcohols are capable of being metabolized,*  
178 *primarily in the liver, via ADH.*
- 179 • *Oxidative metabolism of primary and secondary  $\beta$ -olefinic alcohols results in the*  
180 *corresponding  $\alpha$ ,  $\beta$ -unsaturated aldehyde or  $\alpha$ ,  $\beta$ -unsaturated ketone.*

- 181 • *These  $\alpha$ ,  $\beta$ -unsaturated aldehydes or  $\alpha$ ,  $\beta$ -unsaturated ketones are the definitive*  
182 *electrophilic toxicants and their in vivo potency is related to relative thiol reactivity;*  
183 *thus, only  $\beta$ -unsaturated alcohols with metabolism similar to 2-propen-1-ol and reactive*  
184 *potency similar to acrolein may be read across for 2-propen-1-ol with reasonable*  
185 *certainty.*

## 186 2.2. Justification

187 In general, toxicological data on 2-propen-1-ol demonstrate significant toxicity. The oral LD50  
188 for rat is 37 mg/kg for 2-propen-1-ol (Klinger et al., 1986), while the rat oral LD50 for the  
189 saturated isomer 1-propanol is 1870 mg/kg (Smyth et al., 1954).

190 Several 90-day oral repeated-dose toxicity evaluations of 2-propen-1-ol have been conducted.  
191 Male and female Long-Evans rats were exposed orally to 0, 0.17, 0.94, 7.3, 13.2, 34.0, 43.7, and  
192 67.4 mg/kg bw/d for 13 weeks (females) and 0, 0.13, 0.62, 5.9, 11.6, 25.5, 41.0, and 72.0 mg/kg  
193 bw/day (male) (Dunlap et al., 1958). The No Observed Adverse Effect Level (NOAEL) of 13.2  
194 mg/kg bw/d (for females) and 11.6 mg/kg bw/d for male were reported. This observation was  
195 based on increases in relative kidney (both sexes) and liver weights (males) (Dunlap et al., 1958).

196 In another study, male and female Wistar rats were exposed orally to 0, 4.8, 8.3, 14.0 and 48.2  
197 mg/kg bw/d (males) and 0, 6.2, 6.9, 17.1, and 58.4 mg/kg bw/d (females) for 15 weeks  
198 (Carpanini et al., 1978). The reported NOAEL, based on increases in relative kidney weight and  
199 decrease in water intake and body weight, was 4.8 and 6.2, mg/kg bw/d for male and female  
200 respectively.

201 In a third study mixed sexes of F344/N rats and B6C3F1 mice were exposed to 2-propen-1-ol by  
202 gavage to 0, 1.5, 3, 6, 12, or 25 and 0, 3, 6, 12, 25, or 50 mg/kg bw/d, respectively for 14 weeks  
203 and the clinical chemistries were examined in detail (NTP, 2006). The major toxic response in  
204 both mice and rats occurred in the forestomach and the NOAEL values derived from this toxic  
205 effect were 3 and 6 mg/kg bw/d for mice and rats, respectively. However, the treatment with the  
206 highest evaluated dose, 25 mg/kg, significantly increased the incidences of bile duct hyperplasia  
207 and periportal hepatocellular hypertrophy in female rats but not in males. The sex difference in  
208 2-propen-1-ol hepatotoxicity in rats was also reported by Rikans and Moore (1987) and was  
209 explained by the greater alcohol dehydrogenase activity in female rats than in male rats. Also in  
210 mice, females were more responsive than males, and increased incidences of portal cytoplasmic  
211 vacuolization occurred in 12 mg/kg or greater in females; whereas in males, this lesion was first

212 observed at 25 mg/kg (NTP, 2006). However, these differences in hepatotoxic responses  
213 between male and female rats seem not to be relevant to this case study as they should be  
214 observed for other  $\beta$ -olefinic alcohols. Based on the effects in the liver, the NOAEL values of 6  
215 and 25 mg/kg bw/day in male and female rats, respectively, have been established.

216 The second  $\beta$ -olefinic alcohol tested in acute toxicity as well as in 90 days repeat dose assay is 3-  
217 methyl-2-buten-1-ol. The LD50 for the rat after oral administration of 3-methyl-2-buten-1-ol is  
218 810 mg/kg with symptoms such as: apathy, dyspnoea, redness of eyes and ears (Belsito et al.,  
219 2010).

220 To our knowledge, only one 90-day oral repeated-dose toxicity evaluation of 3-methyl-2-buten-  
221 1-ol has been conducted (see ECHA Study report 2002; OECD 2003; Mc Ginty et al., 2010).  
222 Following OECD test guideline 408, 3-methyl-2-buten-1-ol was administered to groups of 10  
223 male and 10 female Wistar rats were exposed via drinking water at concentrations of 14.4, 65.4  
224 and 243.8 mg/kg bw/day for male and 21.0, 82.1 and 307.2 mg/kg bw/day for female for three  
225 months (ECHA Study report 2002). Substance related effects were seen at the high and mid dose  
226 level. In the mid dose groups, decreased food and water consumption in male rats and reduced  
227 water consumption in female rats was noted. Body weight was significantly impaired at the high  
228 dose in male and female rats. In the mid and high dose, the mean absolute liver weights in male  
229 rats were significantly decreased, but not the relative liver weights. There were no other  
230 treatment related significant changes in clinical examinations. As reduction in food and water  
231 consumption resulted in significant decrease of body weight only at the high dose level, the  
232 NOAEL was assessed to be 65.4 mg/kg bw/day in male rats and 82.1 mg/kg bw/day in female  
233 rats.

234 It is noted that two more sub-acute oral studies in rats do not show any other effects of 3-methyl-  
235 2-buten-1-ol. Specifically, a 14-days drinking water study with rats (3/sex/dose) exposed to 250,  
236 500, 750 and 1500 mg/kg bw/d reported acute toxic effects at 1500 mg/kg bw/d; reduced food  
237 and water intake was observed at 250 mg/kg bw/d (Belsito et al., 2010). So there is good  
238 concordance with 90-day test results. In a 14-day gavage test with rats exposed to 250, 500 and  
239 750 mg/kg bw/d no treatment related effects were observed. (ECHA Study report 2003).

240 In summary, while protocols vary, three studies have experimentally evaluated 2-propen-1-ol  
241 and one study evaluated 3-methyl-2-buten-1-ol in 90-day, oral repeated-dose testing schemes.



242 Repeated-dose toxicity data on 2-propen-1-ol indicate liver and kidney are the target organs. For  
 243 the 3-methyl-2-buten-1-ol, only the reduction in food and water consumption was observed. The  
 244 90-day NOAEL values for oral administration are between 3 and 15 mg/kg bw/d for 2-propen-1-  
 245 ol and 60 -85 mg/kg bw/d for 3-methyl-2-buten-1-ol. These ranges of NOAEL values are 10-100  
 246 times smaller than those reported for saturated derivatives.

### 247 2.3. Applicability domain

248 The applicability domain for this read-across was confined to subclasses of  $\beta$ -unsaturated  
 249 aliphatic alcohols with carbon chain lengths from C3 to C6. Specifically, these included primary  
 250 (external hydroxyl group) and secondary (internal hydroxyl group) with a  $\beta$ -positioned vinylic  
 251 moiety (Table 1). A key structural feature was the presence of a free H-atom on the hydroxyl-  
 252 containing C-atom. Hence, tertiary isomers were not considered as members of this category.

### 253 2.4. Analogues or category members

254 Sixteen  $\beta$ -olefinic alcohols were chosen initially to form a category for the read-across case study  
 255 and are listed in Table 1. The additional identifiers/information, such as chemical structures and  
 256 molecular formulas are available in the Table 1 in Annex 1. The additional chemical, 2-propyn-  
 257 1-ol (i.e., propargyl alcohol, 1-propyn-3-ol) represents the  $\beta$ -acetylenic alcohols. Similar to the  
 258 potential source substance, 2-propen-1-ol, it is well studied chemical with *in vivo* and *in vitro*  
 259 data, therefore can serve as “positive control”, supporting the evidence for toxicity of  $\beta$ -  
 260 unsaturated alcohols. Based on extended structural fragments, the  $\beta$ -olefinic alcohol category  
 261 includes five sub-groups. These sub-groups can be clustered into two sub-categories – straight-  
 262 chained and branched  $\beta$ -olefinic alcohols.

263 **Table 1. Potential category analogues for  $\beta$ -olefinic alcohols.**

264	Name	CAS No	SMILES	Type of Alcohol	
265	<b>Straight-chained</b>				
266	1) 2-Propen-1-ol				
267	(1-propen-3-ol; allyl alcohol)	107-18-6	OCC=C	prim. allylic	terminal OH & C=C
268	5) 2-Buten-1-ol	6117-91-5	OCC=CC	prim. allylic	terminal OH, internal C=C
269	6) 2-Penten-1-ol	20273-24	OCC=CCC	prim. allylic	terminal OH, internal C=C
270	7) 2-Hexen-1-ol	2305-21-7	OCC=CCCC	prim. allylic	terminal OH, internal C=C
271	2) 1-Buten-3-ol (3-buten-2-ol)	598-32-3	C=CC(O)C	sec. allylic	internal OH, terminal C=C
272	3) 1-Penten-3-ol	616-25-1	C=CC(O)CC	sec. allylic	internal OH, terminal C=C
273	4) 1-Hexen-3-ol	4798-44-1	C=CC(O)CCC	sec. allylic	internal OH, terminal C=C
274	8) 3-Penten-2-ol	1569-50-2	CC(O)C=CC	sec. allylic	internal OH & C=C
275	9) 3-Hexen-2-ol	42185-97-7	CC(O)C=CCC	sec. allylic	internal OH & C=C

276	10) 4-Hexen-3-ol	4798-58-7	CCC(O)C=CC	sec. allylic	internal OH & C=C
277					
278	<b>Branched-chained</b>				
279	11) 2-Methyl-2-propen-1-ol	513-42-8	OCC(C)=C	prim. allylic	terminal OH & C(C)=C
280	12) 2-Methyl-2-buten-1-ol	4675-87-0	OCC(C)=CC	prim. allylic	terminal OH, internal
281	C(C)=C				
282	13) 2-Methyl-2-penten-1-ol	1610-29-3	OCC(C)=CCC	prim. allylic	terminal OH, internal
283	C(C)=C				
284	14) 3-Methyl-2-buten-1-ol	556-82-1	OCC=C(C)C	prim. allylic	terminal OH, internal
285	C=C(C)				
286	15) 3-Methyl-3-penten-2-ol	2747-53-7	CC(O)C(C)=CC	sec. allylic	internal OH & C(C)=C
287	16) 4-Methyl-3-penten-2-ol	4325-82-0	CC(O)C=C(C)C	sec. allylic	internal OH & C=C(C)
288					
289	<b><math>\beta</math>-acetylenic</b>				
290	17) 2-Propyn-1-ol (1-propyn-3-ol)	107-19-7	OCC#C	prim. propargylic	terminal OH & C#CC)
291					

## 292 2.5. Purity/impurities

293 The purity/impurity profile for the analogues listed in 2.4 is unknown. However, since the  
 294 category is structurally limited, the potential impact of any impurities on the endpoint being  
 295 considered is very limited. The most likely impurities are other isomers (e.g. *cis* vs. *trans*  
 296 conformations).

## 297 **3. Data matrices for assessing similarity**

298 The data supporting the similarity argument for the analogues listed in section 2.4 are reported in  
 299 Annex 1.

### 300 3.1. Structural similarity

301 As demonstrated in Table 1 of Annex I all the  $\beta$ -olefinic alcohols include in the category are  
 302 structurally similar (e.g., C3-C6). Specifically, they: 1) belong to a common chemical class,  $\beta$ -  
 303 unsaturated alcohols, 2) the subclass  $\beta$ -olefinic alcohols, and 3) possess one of two molecular  
 304 scaffoldings, primary with an external hydroxyl or secondary with an internal hydroxyl  
 305 configuration. Structural similarity is complicated by the presence or absence of alkyl  
 306 substituents (i.e., methyl groups) on the allylic moiety. The potential source substance, 2-propen-  
 307 1-ol, is a unique  $\beta$ -olefinic alcohol, one with both a terminal hydroxyl and terminal vinyl group.  
 308 In contrast, another potential category member, 3-methyl-2-buten-1-ol, is dissimilar as it has an  
 309 alkyl substituent on the olefinic carbon that can inhibit the protein binding site of the vinyl group.

### 310 3.2. Chemical property similarity

311 As demonstrated in Table 2 of Annex I, all the  $\beta$ -olefinic alcohols include in the category have  
312 very narrow value ranges for their physico-chemical properties. Specifically, all category  
313 members exhibit molecular weights from 58 to 100 g/mol. While hydrophobicity (log Kow)  
314 increases with number of C-atoms from 0.17 to 1.66, density is constant at 0.8 +/- 0.1 g/cm<sup>3</sup>.  
315 Vapour pressure and water solubility decrease with molecular size and therefore vary only  
316 slightly within the category. All category members are liquids over the typical temperature range  
317 as melting points are all well below 0 °C and boiling points are all around or above 100 °C.

### 318 3.3. Chemical constituent similarity

319 As demonstrated in Table 3 of Annex I, all the  $\beta$ -olefinic alcohols include in the category have  
320 common constituents in the form of: 1) a single polar substituent, -OH, 2) a  $\beta$ -positioned olefin  
321 (C=C) moiety. Other structural fragments are limited to -H, -CH<sub>3</sub> and -CH<sub>2</sub>- groups.

### 322 3.4. Toxicokinetic similarity

323 As demonstrated in Table 4 of Annex I, the toxicokinetic understanding of primary and  
324 secondary  $\beta$ -olefinic alcohols is incomplete. The oxidation of primary alkanols and primary  
325 olefinic alcohols to the corresponding aldehydes is catalysed by NAD<sup>+</sup>/NADH-dependent ADH  
326 (Pietruszko et al., 1973). Olefinic alcohols were better substrates for human liver ADH than the  
327 corresponding saturated alcohols. A comparison of the alcohol structure with the enzyme binding  
328 affinity of alcohol dehydrogenase indicates that increased binding (lower K<sub>m</sub>) occurs with  
329 increasing chain length (C3-C6) of the alcohols and the presence of unsaturation. Specifically,  
330 binding affinities with human liver ADH were measured *in vitro* for 2-propen-1-ol, 2-buten-1-ol,  
331 3-methyl-2-buten-1-ol and 2-hexen-1-ol and they are: 0.05, 0.01, 0.0045 and 0.003 mM,  
332 respectively (Pietruszko et al., 1973). With the exception of 2-propen-1-ol, the K<sub>m</sub> values of  
333 unsaturated alcohols are 14-20 times lower than for the corresponding saturated alcohols (K<sub>m</sub> =  
334 0.10, 0.14, 0.07 and 0.06 for 1-propanol, 1-butanol, 3-methyl- 1-butanol and 1-hexanol,  
335 respectively) (Pietruszko et al., 1973). The maximum rates of oxidation were essentially constant,  
336 regardless of the alcohol structure, suggesting that alcohol-enzyme binding is not the rate-  
337 limiting step for oxidation (Klesov et al., 1977). The activity of the enzyme appears to be  
338 dependent on the lipophilic character of the alcohol.

339 Fontaine et al. (2002) studied the enzymatically formation of 2-butenal from the  $\beta$ -olefinic  
340 alcohol, 2-buten-1-ol. This is analogous to the manner in which allyl alcohol is converted *in vivo*

341 to its toxic oxidative product, acrolein. In kinetic studies it was found that 2-buten-1-ol was  
342 readily oxidized by equine liver ADH, with electrospray-mass spectrometry confirming that 2-  
343 butanal was the main metabolite formed. It was also reported that in mouse hepatocytes, 2-buten-  
344 1-ol produced marked time- and concentration-dependent cell killing as well as pronounced  
345 glutathione depletion. Most importantly, both cytotoxicity and glutathione loss were eliminated  
346 with the addition of the ADH inhibitor 4-methylpyrazole, indicating the ADH-mediated pathway  
347 is responsible for producing these effects. In keeping with expectations that Michael addition  
348 adducts would feature prominently during protein modification, Fontaine and co-workers (2002)  
349 note that exposure to 2-buten-1-ol resulted in marked carbonylation of a range of cell proteins.  
350 Damage to a subset of small proteins (e.g., 29, 32, 33 kDa) is closely correlated with the severity  
351 of cell death. This cytotoxicity, as well as glutathione depletion, were eliminated by the addition  
352 of 4-methylpyrazole. Collectively, these results demonstrate that for the model  $\beta$ -olefinic alcohol,  
353 2-buten-1-ol, toxicity via Michael addition is accompanied by ADH-mediated metabolism.

354 Further oxidation of the aldehyde produces the corresponding acid. The corresponding  
355 carboxylic acid may enter the  $\beta$ -oxidation pathway and be subsequently metabolized to CO<sub>2</sub> via  
356 the tricarboxylic acid pathway or be glucuronidated prior to excretion in the urine. However, this  
357 detoxification is not considered to be relevant to repeated-dose toxicity.

358 Secondary alcohols are expected to be excreted via conjugation or oxidized to ketones, which  
359 cannot be further oxidized. Additionally, they can be excreted unchanged or undergo  
360 hydroxylation of the carbon chain, which in turn may give rise to a metabolite that can be more  
361 readily excreted.

### 362 3.5. Metabolic similarity

363 As demonstrated in Table 5 of Annex I, all of the  $\beta$ -olefinic alcohols included in the category are  
364 predicted by *in silico* tools to be metabolized to the corresponding  $\alpha$ ,  $\beta$ -unsaturated aldehydes or  
365  $\alpha$ ,  $\beta$ -unsaturated ketones. These soft electrophiles subsequently react with GSH and protein thiols  
366 in hepatocytes (Boylard and Chasseaud, 1967; Fontaine et al., 2002).

367 From a structural standpoint, only primary and secondary  $\beta$ -olefinic alcohols are able to be  
368 activated by ADH to form polarized  $\alpha$ ,  $\beta$ -unsaturated electrophiles (Bradbury and Christensen,  
369 1991). The availability of H-atoms on the C-atom with hydroxyl OH group is crucial to the  
370 metabolic activations and subsequent expression of relative toxic potency. Primary alcohols have

371 one alkyl-group; thus, two H-atoms are available for metabolism. Secondary alcohols have two  
372 alkyl-groups and one H-atom available for alcohol dehydrogenase attack. Tertiary alcohols are  
373 substituted with three alkyl-groups on the  $\alpha$ -carbon; thus, no H-atoms are available for  
374 metabolism. Since at least one H-atom must be freely available for cleavage by ADH, tertiary  
375 alcohols are not metabolized to Michael acceptor electrophilic derivatives by ADH (Veith et al.,  
376 1989). It follows that primary  $\beta$ -olefinic alcohols are likely to be more readily converted to  
377 reactive metabolites than secondary ones.

378 Based on metabolic similarity, the read-across category is limited to primary and secondary  $\beta$ -  
379 olefinic alcohols. The finding of Moridani et al. (2001) suggests that the primary  $\beta$ - acetylenic  
380 alcohol, 2-propyn-1-ol, induces cytotoxicity via metabolic activation by CYP 2E1 to form 2-  
381 propynal which in turn causes hepatocyte lysis as a result of GSH depletion and lipid  
382 peroxidation. Specifically, 2-propyn-1-ol-induced cytotoxicity was marked by enhanced CYP  
383 2E1-induced hepatocytes and prevented by various CYP 2E1 inhibitors. Moreover, the authors  
384 further reported that cytotoxicity of 2-propyn-1-ol was only slightly affected when ADH was  
385 inhibited with 4-methylpyrazole or when liver catalase was inactivated with azide or  
386 aminotriazole. However, cytotoxicity was prevented when lipid peroxidation was inhibited with  
387 antioxidants, desferoxamine or dithiothreitol. Additionally, the authors found out that hepatocyte  
388 GSH depletion preceded cytotoxicity and can be inhibited by cytochrome P450 inhibitors but not  
389 by liver catalase and ADH inhibitors. Two-propyn-1-ol –induced cytotoxicity and reactive  
390 oxygen species formation were markedly increased in GSH-depleted hepatocytes (Moridani et al.,  
391 2001).

### 392 3.6. Toxicophore similarity

393 As demonstrated in Tables 6A and 6B of Annex I, based on *in silico* predictions, only the  
394 metabolites of  $\beta$ -olefinic alcohols and not the parent compounds triggered the OECD protein  
395 binding profiler within the OECD QSAR Toolbox v3.3.5. The all metabolites of  $\beta$ -olefinic  
396 alcohols, but 4-methyl-3-penten-2-one are associated with Michael addition or Schiff base  
397 formation mechanisms. Moreover, the potency of protein binding varies between the five sub-  
398 structure groups what can be accounted for sub-categorisation of  $\beta$ -olefinic alcohols.

### 399 3.7. Mechanistic plausibility similarity

400 Reactivity with biological molecules consists of a variety of conjugation, substitution, and  
401 addition reactions, which have their foundation in the principles of organic reactions (Schwöbel  
402 et al., 2011). As demonstrated in Table 7 of Annex I, the  $\beta$ -olefinic alcohols included in the  
403 category are associated via the ADH-induced Michael addition mechanism of action. This  
404 mechanism is based on covalent interaction with thiols (Schwöbel et al., 2011).

405 As noted by Richarz et al. (2013), the over-arching toxic pathway involves metabolic activation  
406 to soft electrophilic derivatives which prefer to covalently interact with thiol-containing cellular  
407 nucleophiles (e.g., glutathione). Cellular events include does-dependent necrosis or  
408 mitochondrial-based apoptosis; whereas liver and kidney are the target organs.

409 Landesmann et al. (2012) reported a preliminary adverse outcome pathway (AOP) leading from  
410 the molecular initiating event of covalent protein binding to the adverse effect of liver fibrosis.

411 They noted a number of key intermediate events including:

- 412 • Hepatocyte injury and death
- 413 • Activation of Kupffer cells (liver macrophages)
- 414 • Inflammation
- 415 • Oxidative stress
- 416 • Activation of TGF-  $\beta$
- 417 • Activation of stellate cells (mesenchymal stem cells)
- 418 • Collagen synthesis and accumulation
- 419 • Alteration in connective tissue extracellular matrix

420 This AOP was constructed in large part from data on 2-propen-1-ol and its metabolite - acrolein.  
421 The molecular initiating event of this pathway is covalent binding to thiols. More specifically,  
422 upon reaching the liver, the non-reactive parent alcohol is converted enzymatically to the  
423 corresponding  $\alpha$ ,  $\beta$ -unsaturated aldehyde or  $\alpha$ ,  $\beta$ -unsaturated ketone. These reactive species, in  
424 turn, bind to thiols such as GSH. Once GSH is dissipated, the  $\alpha$ ,  $\beta$ -unsaturated substrates react  
425 with other cellular thiols, especially in mitochondrial proteins. This denaturing of proteins leads  
426 to apoptosis or necrosis of hepatocytes and subsequent events along the AOP.

427 The short-term isolated perfused liver represents an *ex vivo* model which is close to the *in vivo*  
428 condition. The major advantages are that the three-dimensional architecture of the liver and the  
429 metabolic capabilities of the hepatocytes are preserved. Strubelt et al. (1999) studied acute  
430 toxicity and metabolism in a series of short-chain alcohols. Specifically, the effects of 23  
431 alcohols at a single concentration (65.1 mmol/L) in isolated rat livers perfused at 60 ml/hr for

432 two hours were examined. The authors demonstrated that, for straight-chain saturated primary  
 433 alcohols, hepatic cell injury measured by the release of three cytosolic enzymes into the  
 434 perfusate and reduction in oxygen consumption were directly related to chain length. In most  
 435 cases, hepatic ATP concentrations decreased in a similar manner to hepatic cell injury and  
 436 oxygen consumption (Strubelt et al., 1999). *In vitro* toxicity profiles for selected  $\beta$ -unsaturated  
 437 alcohols are reported in Table 2.

438

439 **Table 2. *In vitro* toxicity profiles for  $\beta$ -olefinic alcohols.**

440	Name	LDH	O <sub>2</sub>	ATP	GSH
441		(U/l)	( $\mu\text{mol/g x min}$ )	( $\mu\text{mol/g}$ )	( $\mu\text{mol/g}$ )
442	Control	1109 $\pm$ 265	1.54 $\pm$ 0.07	1.25 $\pm$ 0.20	2.52 $\pm$ 0.29
443					
444	<b>Straight-chained</b>				
445	1) 2-Propen-1-ol	27747 $\pm$ 2756	0.10 $\pm$ 0.01	0.07 $\pm$ 0.01	0.28 $\pm$ 0.12
446	5) 2-Buten-1-ol	10977 $\pm$ 2433	0.47 $\pm$ 0.06	0.11 $\pm$ 0.01	0.02 $\pm$ 0.01
447	6) 2-Penten-1-ol				
448	7) 2-Hexen-1-ol				
449	2) 1-Buten-3-ol	25756 $\pm$ 1355	0.19 $\pm$ 0.04	0.09 $\pm$ 0.00	0.03 $\pm$ 0.00
450	3) 1-Penten-3-ol				
451	4) 1-Hexen-3-ol				
452	8) 3-Penten-2-ol				
453	9) 3-Hexen-2-ol				
454	10) 4-Hexen-3-ol				
455					
456	<b>Branched-chained</b>				
457	11) 2-Methyl-2-propen-1-ol	15552 $\pm$ 3282	0.45 $\pm$ 0.01	0.15 $\pm$ 0.01	0.04 $\pm$ 0.02
458	12) 2-Methyl-2-buten-1-ol				
459	13) 2-Methyl-2-penten-1-ol				
460	14) 3-Methyl-2-buten-1-ol	7738 $\pm$ 1460	0.84 $\pm$ 0.24	0.55 $\pm$ 0.22	0.26 $\pm$ 0.07
461	15) 3-Methyl-3-penten-2-ol				
462	16) 4-Methyl-3-penten-2-ol				
463					
464	<b><math>\beta</math>-acetylenic</b>				
465	17) 2-Propyn-1-ol	13743 $\pm$ 2457	0.19 $\pm$ 0.05	0.14 $\pm$ 0.02	0.08 $\pm$ 0.05
466					
467	<b>Saturated</b>				
468	18) 1-Propanol	4731 $\pm$ 1867	1.66 $\pm$ 0.13	0.98 $\pm$ 0.19	3.39 $\pm$ 0.45
469	19) 1-Butanol	8946 $\pm$ 2411	0.98 $\pm$ 0.40	0.88 $\pm$ 0.09	3.76 $\pm$ 0.72
470	20) 1-Pentanol	28959 $\pm$ 4142	0.06 $\pm$ 0.01	0.22 $\pm$ 0.03	2.82 $\pm$ 0.36
471	21) 2-Methyl-1-propanol	11499 $\pm$ 2898	0.88 $\pm$ 0.10	0.53 $\pm$ 0.05	2.38 $\pm$ 0.99

472	22)	3-Methyl-1-butanol	8680 ± 1216	0.22 ± 0.07	0.10 ± 0.01	1.33 ± 0.29
473	23)	2-Methyl-2-butanol	9353 ± 2582	1.13 ± 0.33	0.62 ± 0.23	1.63 ± 0.25
474	24)	2-Methyl-3-butyn-2-ol	2078 ± 1524	1.20 ± 0.20	0.68 ± 0.07	1.68 ± 0.33

475

476 Testing using isolated perfused liver demonstrated that saturated alcohols elicited no change in  
 477 GSH levels. In contrast, unsaturated straight-chain alcohols, including allyl alcohol caused  
 478 significant reductions in GSH (Strubelt et al., 1999).

479 The major weakness of the Strubelt study is the lack of dose-response data. However, the results  
 480 of the Strubelt study support the premise that 1-alken-3-ols, 2-alken-1-ols, and 2-methyl-2-alken-  
 481 1-ols are metabolized and give rise to a metabolite of similar potency to 2-propen-1-ol and thus  
 482 very likely to cause similar repeated-dose toxicity. The data in Table 2 also support the structural  
 483 selectivity to the category as tertiary  $\beta$ -unsaturated alcohols, as well as alkanols, do not reduce  
 484 GSH (i.e., are not metabolized to reactive electrophiles). Moreover, they do not elicit the same  
 485 repeated-dose effects. The structural saturated analogue of 2-propen-1-ol – 1-propanol was tested  
 486 in rats for four months at the dose of 3000mg/kg bw/d (Hillbom et al., 1974). Food consumption,  
 487 body weight gain, and liver histopathology were comparable to those of the control group.  
 488 Additionally, the 90 days oral repeat-dose toxicity NOEL for 2-propanol in rat was reported as  
 489 870 mg/kg bw/d, based on the relative organ weights of liver, kidneys, and adrenals (Pilegaard et  
 490 al., 1993).

### 491 3.8. Other endpoint similarity

492 The basic structure-activity relationships for chemical reactivity via Michael additions to thiols  
 493 are pivotal for understanding hepatotoxic potency both *in vitro* and *in vivo*.

494 Acrolein is unique among the  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds as it alone is the only  
 495 molecular structure having both a terminal vinyl group and a terminal carbonyl group. These  
 496 structural feature associated with relative reactivity of polarized  $\alpha$ ,  $\beta$ -unsaturated molecules,  
 497 especially where an olefinic moiety conjugated to a carbonyl group, toward the model  
 498 nucleophile glutathione, have been examined (Schultz et al., 2005). This  $\alpha$ ,  $\beta$ -unsaturated  
 499 structure conveys the capacity to undergo a covalent interaction with the thiol group of cysteine  
 500 in the form of Michael addition (Schwöbel et al., 2011). Quantitatively, reactivity of the  $\alpha$ ,  $\beta$ -  
 501 unsaturated carbonyl compounds with glutathione is reliant upon the specific molecular structure,  
 502 with several trends being observed and reported (Schultz et al., 2005; Schwöbel et al., 2011). *In*



503 *chemico* reactivity data (RC<sub>50</sub> values) in the form of the depletion of GSH after 120-minutes by  
 504 selected  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds are reported in Table 3.

505 **Table 3. *In chemico* reactivity profiles for  $\alpha$ ,  $\beta$ -unsaturated aldehydes and ketones.**

506	Alcohol	Metabolite	Metabolite SMILES	GSH RC <sub>50</sub>
509	<b>Straight-chained</b>			
510	1) 2-Propen-1-ol	2-Propenal (acrolein)	O=CC=C	0.085
511	5) 2-Buten-1-ol	2-Butenal (crotonaldehyde)	O=CC=CC	0.22
512	6) 2-Penten-1-ol	trans-2-Pentenal	O=CC=CCC	0.35
513	7) 2-Hexen-1-ol	trans-2-Hexenal	O=CC=CCC	0.42
514	2) 1-Buten-3-ol	Methyl vinyl ketone	C=CC(=O)C	0.070
515	3) 1-Penten-3-ol	Ethyl vinyl ketone	C=CC(=O)CC	0.051
516	4) 1-Hexen-3-ol	Propyl vinyl ketone	C=CC(=O)CCC	0.059
517	8) 3-Penten-2-ol	3-Penten-2-one	CC(=O)C=CC	0.15
518	9) 3-Hexen-2-ol	3-Hexen-2-one	CC(=O)C=CC	not tested
519	10) 4-Hexen-3-ol	4-Hexen-4-one	CCC(=O)C=CC	0.34
520				
521	<b>Branched-chained</b>			
522	11) 2-Methyl-2-propen-1-ol	2-Methyl acrolein	O=CC(C)=C	not tested
523	12) 2-Methyl-2-buten-1-ol	2-Methyl-2-butenal	O=CC(C)=CC	12
524	13) 2-Methyl-2-penten-1-ol	2-Methyl-2-pentenal	O=CC(C)=CCC	21
525	14) 3-Methyl-2-buten-1-ol	3-Methyl-2-butenal	O=CC=C(C)C	13
526	15) 3-Methyl-3-penten-2-ol	3-Methyl-3-penten-2-one	CC(=O)C(C)=CC	10
527	16) 4-Methyl-3-penten-2-ol	4-Methyl-3-penten-2-one	CC(=O)C=C(C)C	26
528				
529	<b>Saturated</b>			
530	17) 1-Propanol	1-propanal/1-propionic acid		not reactive at 1000 mg/l
531	18) 1-Butanol	1-butanal/1-butyric acid		not reactive at 1000 mg/l
532	19) 1-Pentanol	1-pentanal/1-pentanoic acid		not reactive at 1000 mg/l
533	20) 2-Methyl-1-propanol	2-methyl-1-propanal/2-methyl-1-propionic acid		not reactive at 1000 mg/l
534	21) 3-Methyl-1-butanol	3-methyl-1-butanal/2-methyl-1-butyric acid		not reactive at 1000 mg/l
535	22) 2-Methyl-2-butanol	2-methyl-2-butanone		not reactive at 1000 mg/l
536	23) 2-Methyl-3-butyn-2-ol	not metabolized		not reactive at 500 mg/l
537	24) 2-Methyl-3-buten-2-ol	not metabolized		not reactive at 500 mg/l

539 Specifically, it has been reported that for  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds, such as those  
 540 derived from hepatic oxidative metabolism of  $\beta$ -olefinic alcohol: 1) terminal vinyl-substituted  
 541 derivatives (H<sub>2</sub>C=C-) were more reactive than the internal vinylene-substituted ones (-CH=CH-);  
 542 2) methyl-substitution on the vinyl carbon atoms diminishes reactivity, 3) methyl-substitution on  
 543 the carbon atom farthest from the carbonyl group (C(=O)C=C(C) causes a larger reduction than

544 methyl-substitution on the carbon atom nearest to the carbonyl group ( $C(=O)C(C)=C$ ), and 4  
545 derivatives with carbon-carbon double bond on the end of the molecule (i.e., vinyl ketones) were  
546 more reactive than ones with the carbon-oxygen double bond at the end of the molecule (i.e.,  
547 aldehydes).

548 The results from the thiol reactivity experiments (see Table 3) suggest that the ability of  $\alpha$ ,  $\beta$ -  
549 unsaturated carbonyl compounds other than acrolein (and thus,  $\beta$ -olefinic alcohol other than 2-  
550 porpen-1-ol) to elicit kidney and liver targeted toxicity may be reduced, especially for branched  
551 alcohols with alkyl substitutions on the vinyl carbon atoms.

552 In fish, this mode of toxic action involves metabolism of the parent alcohol to the corresponding  
553  $\alpha$ ,  $\beta$ -unsaturated aldehyde or ketone via alcohol dehydrogenase (Lipnick, 1985; Veith et al.,  
554 1989). The conventional thinking is that, while the parent aliphatic alcohols elicit baseline  
555 narcosis toxic action, the metabolites are electrophilic toxicants. Specifically, the metabolites are  
556 polarized  $\alpha$ ,  $\beta$ -unsaturated chemicals which undergo a Michael-type addition to soft nucleophilic  
557 sites in proteins (Schwöbel et al., 2011). Bradbury and Christensen (1991) confirmed the role of  
558 alcohol dehydrogenase activity in metabolic activation and enhanced toxicity in fish. Specifically,  
559 the alcohol dehydrogenase in the gill epithelial cells metabolizes the appropriate alcohol to the  
560 corresponding aldehyde (or ketone), which in turn reacts with cellular proteins. The end result is  
561 death of the gill epithelia cells, which results in the loss of the ability to extract oxygen causing  
562 subsequent hypoxia and fish mortality. This mechanism was described for model electrophiles  
563 by respiratory and cardiovascular responses in trout (McKim et al., 1987).

564 Acute toxicity studies with the fathead minnow (*Pimephales promelas*) found that primary and  
565 secondary allylic alcohols and primary and secondary propargylic alcohols exhibit potency in  
566 excess of that predicted by saturated alcohols and baseline narcosis QSAR models (Lipnick,  
567 1985; Lipnick et al., 1987). However, tertiary olefinic and tertiary acetylenic alcohols exhibit  
568 fish toxic potency consistent with baseline narcosis models. The enhanced toxicity of acetylenic  
569 alcohols is thought to be due to metabolic activation to electrophilic  $\alpha$ ,  $\beta$ -unsaturated propargylic  
570 aldehydes or ketones. For primary and secondary homopropargylic alcohols, an activation step  
571 involving biotransformation to an allenic electrophile intermediate was proposed (Veith et al.,  
572 1989).

573 The results from fish acute toxicity experiments support the premise that the basic structure-  
574 activity relationships for chemical reactivity via Michael additions to thiol is key for  
575 understanding mammalian repeated-dose toxic potency of  $\beta$ -unsaturated alcohols.

576

#### 577 **4. Statement of uncertainty in similarity**

578 Data uncertainty and weight-of-evidence associated with the fundamentals of chemical,  
579 transformation/toxicokinetic and toxicological similarity (i.e., toxicokinetic and toxicodynamic  
580 similarity of category members) is low-to-moderate. In Annex II, the assessment of uncertainties  
581 is presented. In terms of chemistry, the complex extended fragment of the applicability domain  
582 of this category leads to moderate similarity of all analogues or category members. Specifically,  
583 the key feature, being a primary or secondary  $\beta$ -unsaturated alcohol of short-chain length is  
584 common within the category and relevant to the toxicity read across. There are differences  
585 among the category members with respect to 2D structure. These differences are related to the  
586 location of hydroxyl group: external (primary alcohols) and internal (secondary alcohols); the  
587 position of the unsaturated moiety, which can be either internal or external and the substitution of  
588 vinyl group with alkyl group (e.g., methyl group). Amongst the category members, 2-propen-1-  
589 ol is a structurally unique  $\beta$ -olefinic alcohol with both a terminal vinyl group and a terminal  
590 hydroxyl. Such structural differences within the  $\beta$ -olefinic alcohols lead to 1) different likely  
591 metabolite (e.g., aldehyde or ketone), 2) different *ex vitro* metabolism (i.e., free GSH levels) and  
592 3) different rates of *in chemico* reactivity (i.e., GSH reactivity). However, it is questionable if  
593 these short-term (i.e., 2-hour) differences are relevant to repeated-dose toxicity.

594 From a toxicokinetic standpoint, there is low-to-medium uncertainty. The narrow range of  
595 carbon atoms of the applicability domain limits the impact of bioavailability. The most likely  
596 metabolic pathway of all analogues is considered to be metabolized via ADH oxidation to similar  
597 reactive derivatives eliciting the same mechanism of chemical reactivity. This metabolic  
598 activation is supported indirectly by the results of the liver perfusion studies by Strubelt et al.  
599 (1999). However, other metabolic mechanisms, such as ROS formation or P450 activation,  
600 cannot be completely ruled out.

601 All analogues or category members are considered, from a toxicodynamic standpoint, to be only  
602 moderately similar. Only two category members: 2-propen-1-ol and 3-methyl-2-buten-1-ol have

603 been evaluated in mammals for *in vivo* repeated-dose effects. For the *in vivo* acute toxicity, nine  
604 of 16 analogues have been tested in mammals.

605 Primary and secondary  $\beta$ -olefinic alcohols are experimentally associated with the pro-  
606 electrophilic mode of toxic action. This mode of action is well-studied, and molecular  
607 mechanism, soft electrophilic reactivity, is well understood. There is a qualitative adverse  
608 outcome pathway available linking electrophilic reactivity via ADH-mediated metabolism to  
609 cellular necrosis and/or apoptosis. It is evident that oral repeated-dose toxicity of primary and  
610 secondary  $\beta$ -olefinic alcohols is related to this molecular mechanism. However, there is  
611 conflicting evidence as to whether the mode of action results in liver fibrosis.

612 High quality *in chemico* data exist for 14 of the 16 category members based on the proposed  $\alpha$ ,  
613  $\beta$ -unsaturated metabolites and their reactivity with GSH. These 14 derivatives include more than  
614 one representative of four of the five structural sub-groups (the other group has only a single  
615 analogue). All 14 analogues exhibit GSH reactivity and there is consistent potency within the  
616 two sub-categories: straight-chained and branched. Specifically, the results showed that  $\beta$ -  
617 olefinic alcohols with a methyl group substituted on a vinyl C-atom are 100 times less reactive  
618 than the non-methyl-substituted  $\beta$ -olefinic alcohol. However, this difference in *in chemico*  
619 reactivity between substituted and unsubstituted alcohols is not exhibited *ex vivo* in liver  
620 perfusion tests.

621 Uncertainty associated with mechanistic relevance and completeness of the read-across  
622 following the traditional exercise is medium. Briefly, uncertainty associated with this read-across  
623 stems from the facts that: 1) one source substance, allyl alcohol, is a unique  $\beta$ -olefinic alcohol  
624 and is metabolized to a unique electrophile, acrolein, 2) the most likely mode-of-action, liver  
625 fibrosis is not supported by the rat oral repeated-dose toxic data, and 3) ADH metabolic  
626 activation is central to the hypothesis; however other transformation mechanisms, such as  
627 autooxidation, ROS formation or P450 activation, cannot be overlooked.

628

## 629 **5. Reducing uncertainty by using new methods information**

630 The new methods data reported here are not intended to be inclusive. Rather they are designed to  
631 demonstrate how new methods data may aid in reducing uncertainties associated with this read-

632 across case study. Further studies may be required to validate that the bioactivation in the new  
633 methods is part of and similar to what is observed under *in vivo* situations.

634 The aims were to use this new method data to improve the description and understanding of  
635 toxicodynamic similarity and reduce uncertainty associated with *in vivo* read-across from 2-  
636 propen-1-ol to other  $\beta$ -olefinic alcohols. Specifically, 2-buten-1-ol, 1-buten-3-ol, 3-methyl-2-  
637 buten-1-ol, as well as the  $\beta$ -acetylenic alcohols 2-methyl-3-butyn-2-ol and 2-propyn-1-ol were  
638 evaluated. The first three alcohols were expected to give similar results to 2-propen-1-ol, while  
639 2-methyl-3-butyn-2-ol and 2-propyn-1-ol were expected to have dissimilar results. Since 2-  
640 methyl-3-butyn-2-ol is a tertiary unsaturated alcohol it was not expected to be metabolically  
641 activated via ADH to an electrophilic Michael acceptor. 2-propyn-1-ol which is activated via  
642 CYP 2E1 activity (Moridani et al., 2001) is toxicokinetically dissimilar.

643 An *in vitro* model was used to assess fibrosis of selected  $\beta$ -unsaturated alcohols. The model  
644 consists of hepatic organoids (3D co-culture) of human hepatocyte-like cells (HepaRG and  
645 primary human hepatic stellate cells (HSC). This culture model has shown to maintain good  
646 hepatocyte functionalities and maintain HSCs in a quiescent-like state for 3 weeks (Leite et al.,  
647 2015). Furthermore, during this period, the 3D HepaRG/HSC co-culture model has been  
648 validated for drug-induced toxicity and fibrosis assays using compounds such as methotrexate  
649 and allyl alcohol (Leite et al., 2015). Based on results with 2-propen-1-ol, the 3D HepaRG/HSC  
650 co-culture model was used to evaluate five other  $\beta$ -unsaturated alcohols.

651 Testing was conducted following the protocol of Leite et al. (2015). Briefly, HepaRG/HSC co-  
652 cultures and 3D HSC control cultures were generated in 96 round-bottom wells, 1 spheroid/well.  
653 Cultures were maintained for 3 weeks with medium exchange every second day. The study was  
654 conducted with test compounds in single and repeated fashion. For single dose assays, spheroids  
655 were exposed on day 20, while for repeated-dose testing spheroids were exposed on day 8, 10,  
656 12, 14, 16, 18 and 20. In both cases, on day 21 cells were lysed either for ATP measurements (as  
657 a toxicity assessment) or mRNA analysis. For dose-response toxicity six different compound  
658 concentrations (i.e., 0, 0.064, 0.32, 8, 40 and 200  $\mu$ M) were tested. Six individual spheroids were  
659 exposed and lysed separately, for each compound, concentration and exposure setup. For RNA,  
660 the analysis focused on one effective concentration (40 $\mu$ M), determined previously for 2-propen-

661 1-ol. Additionally, six individual spheroids were pooled for lysis, RNA extraction and analysis.  
662 The entire suite of assays was performed in duplicate.

663 Both single and repeated-dose assays revealed 2-propen-1-ol is toxic (i.e., reduction in % control  
664 ATP) at the high concentrations (i.e., 40 and 200  $\mu$ M) with potency increasing for all tested  
665 concentrations upon repeated exposure. However, none of the other tested alcohols showed  
666 toxicity for the same concentrations.

667 The analysis of fibrosis-related gene expression was adopted as an easy and accurate way to  
668 screen HSC activation. *In vivo*, upon liver injury HSCs respond by activation which is  
669 accompanied by an increased transcription and production/secretion of extracellular matrix; once  
670 the injury is repeated the described phenotype will lead to the development of fibrosis. The up-  
671 regulation of HSC activation markers such as COL1A1, COL3A1 and LOXL2 at the mRNA  
672 level has been established as a way to detect HSC activation in the current 3D model (Leite et al.,  
673 2015).

674 Although it is known that hepatotoxicity leads *in vivo* to HSC activation, this is not a mandatory  
675 step and there are hepatocyte-mediated compound effects that also activate HSCs. For this reason  
676 the mRNA expression of the main HSC activation markers were checked in the hepatic  
677 organoids upon exposure to 40  $\mu$ M of the different unsaturated alcohols (Table 4).

678 **Table 4.** Summary of COL1A1, COL3A1 and LOXL2 responses to selected  $\beta$ -unsaturated  
679 alcohols. Strong induction indicated by \*\*, while weak induction is indicated by \*.

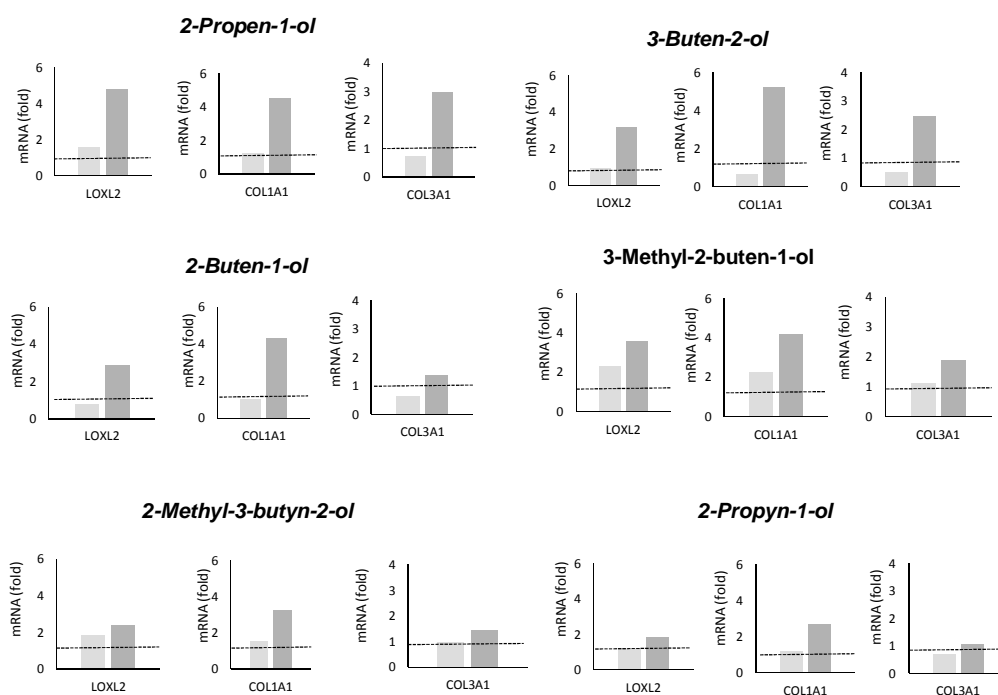
	2-propen-1-ol	1-buten-3-ol	2-buten-1-ol	3-methyl-2-buten-1-ol	2-propyn-1-ol	2-methyl-3-butyn-2-ol
COL1A1	**	**	**	*	*	*
COL3A1	**	**		*		
LOXL2	**	**	**	*		

680

681 Bar graphs demonstrating gene induction are presented in Figure 1. Specifically, 2-propen-1-ol  
682 strongly induced (i.e., >3-4 fold up-regulation) the expression of all three tested markers, but  
683 only upon repeated exposure. This pattern (strong induction of 3 out of 3 tested markers after  
684 repeated exposure), is also observed for 1-buten-3-ol. The up-regulation of the three genes upon  
685 repeated exposure, although to a lesser extent, was also observed for 3-methyl-2-buten-1-ol,

686 however this compound also produces an effect in single exposure. 2-buten-1-ol up-regulates  
 687 two out of the three tested genes (i.e., COL1A1 and LOXL2) in repeated exposure. The only  
 688 alcohols that do not strongly induce (i.e., >3-4 fold up-regulation) of at least two out of three  
 689 markers are 2-methyl-3-butyln-2-ol and 2-propyn-1-ol. Both of the latter alcohols only induce a  
 690 2-3 fold up-regulation of COL1A1 without induction of COL3A1 or LOXL2. The triple-bond-  
 691 containing  $\beta$ - acetylenic alcohols do not exhibit 2-propen-1-ol-like up-regulates of HSC  
 692 activation markers.

693 **Figure 1.** mRNA levels of LOXL2, COL1A1 and COL3A1 in HepaRG/HSC spheroid exposed  
 694 to 40  $\mu$ M  $\beta$ -unsaturated alcohols (fold increase with respect to control, GAPDH mRNA was used  
 695 as a reference gene). Single dose responds in light grey and repeated-dose responds in dark grey.



696  
 697 In another new method study, van de Water and co-workers evaluated stress response activation  
 698 of SRXN1, a target of the transcription factor NRF2, which is activated upon oxidative stress,  
 699 and stress response activation of p21 and BTG2, both targets of the transcription factor p53,  
 700 which is activated upon DNA damage (Wink et al., 2014). Briefly, they used the HepG2 BAC-  
 701 GFP reporter system after induction with 2-propen-1-ol and five structurally-related analogues.

702 The six  $\beta$ -unsaturated alcohols were screened for a logarithmic dose range: 17.7  $\mu$ M, 31.6  $\mu$ M,  
703 56.1  $\mu$ M, 100  $\mu$ M, 177  $\mu$ M, 316  $\mu$ M, 516  $\mu$ M and 1000  $\mu$ M. In addition, all alcohols with the  
704 exception of 2-methyl-3-butyn-2-ol were screened at 1770  $\mu$ M while 2-propen-1-ol was also  
705 screened at 3160  $\mu$ M and 5610  $\mu$ M. Aflatoxin B1 (AB1) was used as a positive control for p53-  
706 mediated DNA damage response.

707 Stress response activation was evaluated at 24- and 48-hrs after exposure using Nikon confocal  
708 microscopy. HepG2 cells were cultured in conventional 2D monolayer and the 3D hydrogel  
709 based assay, which shows a more differentiated liver phenotype (Ramaiahgari et al., 2014).  
710 Green fluorescent protein (GFP) pixel intensity was measured per single cell for 2D monolayer  
711 data. GFP pixel intensity in 3D was measured per spheroid. Error bars were calculated over three  
712 replicates.

713 Since 2-propen-1-ol causes oxidative stress in primary human and rat hepatocytes as well as  
714 under *in vivo* circumstances initial work focused on the SRXN1 reporter. After 24-hrs, all tested  
715  $\beta$ -unsaturated alcohols showed a significant and dose dependent activation of SRXN1-GFP  
716 expression in both the 2D and 3D assays. Aflatoxin B1 also caused up-regulation of the reporter  
717 activity with the point-of-departure concentration starting at 100  $\mu$ M. 2D cultures were more  
718 sensitive to pick of the GFP-SRXN1 reporter activity. After 48-hrs limited up-regulation of  
719 SRXN1-GFP was seen both in 2D and 3D compared to 24-hrs. This is likely due to adaptation of  
720 the system to the oxidative stress. Nevertheless, a clear dose dependent effect was observed.  
721 From the 2D experiments, the fraction of cells where the GFP intensity is higher than two times  
722 DMSO GFP was determined. In both experiments: 24- and 48-hrs, more than 50% of the cells  
723 showed a response to all tested alcohols. Similarly to the overall SRXN1-GFP intensity, at 48-hrs  
724 the percentage of cells that demonstrated a response was less compared to 24-hrs.

725 The response for p21-GFP induction was also evaluated. Aflatoxin B1 caused an up to 20-fold  
726 up-regulation of p21-GFP, which was already clear at 17.7  $\mu$ M. Significant up-regulation was  
727 observed for multiple concentrations for the tested  $\beta$ -unsaturated alcohols. An exception was  
728 noted for 3-methyl-2-buten-1-ol, which exhibited high variation between the three replicates.  
729 Similarly, for 3D the up-regulation of p21-GFP was strong for AB1; for the tested  $\beta$ -unsaturated  
730 alcohols a response was observed for 2-propen-1-ol, 2-propyn-1-ol and 2-methyl-3-butyn-2-ol.  
731 At 48-hrs, AB1 caused an even higher induction of p21-GFP reaching over 30-fold induction



732 under 2D situations; whereas only a mild significant up-regulation of P21-GFP after 48-hrs was  
 733 observed for the alcohol analogues, with hardly any induction for 2-propen-1-ol and 1-buten-3-ol.  
 734 The 3D situation showed significant up-regulation for one concentration of 2-propen-1-ol and 3-  
 735 methyl-2-buten-1-ol at 48-hrs. In general, a limited percentage of cells responded to the tested  
 736 analogues, all treatments showed maximal up to 20 % of the cells reaching the threshold of two  
 737 times the negative control (i.e., DMSO) GFP intensity. In contrast, almost all cells responded to  
 738 AB1.

739 The response for the BTG2-GFP reporter, which reflects a DNA damage response through  
 740 activation of p53 was also examined. No significant induction was observed in 2D after 24-hrs of  
 741 treatment, except for the positive control, AB1, which causes strong DNA damage at 17.7  $\mu$ M.  
 742 Also in 3D spheroids AB1 caused a strong activation of BTG2-GFP reporter activity. While  
 743 exposure to some unsaturated alcohols (i.e., 2-propen-1-ol, 2-propyn-1-ol and 2-methyl-3-butyn-  
 744 2-ol) resulted in a significant induction of BTG2-GFP; induction was not observed at all  
 745 concentrations and the induction was not to the extent exhibited by AB1. After 48-hrs exposure,  
 746 the average GFP intensity in 2D cultures showed some significant up-regulation for 2-propen-1-  
 747 ol, 2-buten-1-ol, 2-propyn-1-ol, and 2-methyl-3-butyn-2-ol. However, no significant up-  
 748 regulation is observed in 3D cultures. For all unsaturated alcohols, between 25% and 45% of  
 749 cells were observed to express GFP intensity higher than two times DMSO GFP intensity.

750 **Table 5.** Summary of SRXN1-GFP, the p21-GFP and BTG2-GFP responses to selected  $\beta$ -  
 751 unsaturated alcohols. Significant up-regulation at any concentration are indicated with an \*.

	<b>2-propen-1-ol</b>	<b>1-buten-3-ol</b>	<b>2-buten-1-ol</b>	<b>3-methyl-2-buten-1-ol</b>	<b>2-propyn-1-ol</b>	<b>2-methyl-3-butyn-2-ol</b>
<b>SRXN1 2D 24h</b>	*	*	*	*	*	*
<b>SRXN1 2D 48h</b>		*	*	*	*	
<b>SRXN1 3D 24h</b>	*	*	*	*	*	*
<b>SRXN1 3D 48h</b>	*				*	
<b>P21 2D</b>	*	*	*		*	*

<b>24h</b>						
<b>P21 2D 48h</b>			*	*	*	*
<b>P21 3D 24h</b>	*				*	*
<b>P21 3D 48h</b>	*			*		
<b>BTG2 2D 24h</b>						
<b>BTG2 2D 48h</b>	*				*	*
<b>BTG2 3D 24h</b>	*				*	*
<b>BTG2 3D 48h</b>						

752

753 It can be concluded from these new methods data that:

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- Straight chain  $\beta$ -olefinic alcohols induce the main HSC activation markers (i.e., COL1A1, COL3A1 and LOXL); the exception COL3A1 for 2-buten-1-ol is noted.
  - Vinylic methyl-substituted  $\beta$ -olefinic alcohols weakly induce the main HSC activation markers tested.
  - $\beta$ -acetylenic alcohols typically do not induce the main HSC activation markers.
  - $\beta$ -unsaturated alcohols primarily activate an oxidative stress response, but not a DNA damage response.
  - $\beta$ -unsaturated alcohols all strongly activate the KEAP1/Nrf2 pathway reporter SRXN1-GFP.
  - SRXN1-GFP activation is strongest at 24 hr exposure, likely due to adaptation towards oxidative stress and therefore reduced activity at later time points.
  - $\beta$ -unsaturated alcohols do not effectively activate the p21-GFP and BTG2-GFP reporter and responses are only generally observed  $>100 \mu\text{M}$ .

767 The premise that the 90-day rat oral repeated-dose toxicity of primary and secondary  $\beta$ -olefinic

768 alcohols of short chain length (i.e., C3 to C6), acting as indirect-acting toxicants with the same

769 covalent mechanism of action, is supported by the new methods data reported above. The new

770 methods data, while limited, also suggest that reduction in reactive potency is associated with  
771 HSC activation. While other metabolic mechanisms, such as ROS formation or P450 activation,  
772 cannot be completely ruled out, the new methods data are consistent with the ADH pathway of  
773 metabolic activation. Taken collectively, these findings demonstrated how new method data  
774 reduce the uncertainty associated with mechanistic relevance and completeness of the read-  
775 across (i.e., uncertainty in the predictions).

776

## 777 **6. Statement of conclusions**

778 The applicability domain for this case study is limited to small (C3 to C6) primary and secondary  
779  $\beta$ -olefinic alcohols. The mechanistic argument is consistent with primary and secondary  $\beta$ -  
780 olefinic alcohols being readily metabolized by alcohol dehydrogenase (ADH) to polarized  $\alpha$ ,  $\beta$ -  
781 unsaturated aldehydes and ketones, which react via Michael addition interaction with thiols in  
782 proteins resulting in cellular apoptosis and/or necrosis. Upon oral repeated-dose exposure, the  
783 latter may, as in the case of 2-propen-1-ol, lead to *in vivo* toxicity involving the kidney and liver  
784 or, as in the case of 3-methyl-2-buten-1-ol, to reductions in food and water uptake. The main  
785 route of exposure for  $\beta$ -olefinic alcohols is oral with immediate absorption from the upper  
786 gastrointestinal tract. They are distributed unbound in the blood and are subsequently readily  
787 enzymatically oxidised, especially in the liver to reactive metabolites.

788 The key element of uncertainty in accepting read-across predictions is rooted in metabolism.  
789 Specifically, the pivotal issues for establishing category membership include: 1) are the  $\beta$ -  
790 olefinic alcohols transformed to metabolites having the same mechanism of electrophilic  
791 reactivity, 2) is the metabolic pathway the same, 3) are the rates of transformation sufficient so  
792 the reactive metabolites are the definitive toxicant for the endpoint being read across, and 4) are  
793 the metabolites similar in reactive potency.

794 Results for selected compounds representing each of the five sub-structural groups with the *ex*  
795 *vivo* model, the 2-hour rat isolated perfused liver, are consistent with the mechanistic hypothesis  
796 of metabolic activation via ADH to soft electrophiles. Specifically, all tested primary and  
797 secondary  $\beta$ -olefinic alcohols exhibit a dramatic reduction (90-99%) in glutathione (GSH) as  
798 compared to controls. *In chemico* reactivity data, in the form of the concentration eliciting a 50%  
799 reduction in free GSH after 2 hours exposure for selected  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds

800 (i.e., potential reactive metabolites of  $\beta$ -olefinic alcohols) also support the applicability domain  
801 of this chemical category. All  $\alpha$ ,  $\beta$ -unsaturated carbonyl compounds such as those derived from  
802 hepatic metabolism of primary and secondary  $\beta$ -olefinic alcohol readily react with GSH.  
803 Specifically,  $\alpha$ ,  $\beta$ -unsaturated carbonyl derivatives of straight-chain alcohols: 1-alken-3-ols and  
804 2-alken-1-ols exhibit 2-hour  $RC_{50}$  values between 0.05 and 0.40 mM, while those of branched  
805 alcohols: 2-methyl-2-alken-1-ols, 3-methyl-2-alken-1-ols, 3-methyl-3-alken-2-ols and 4-methyl-  
806 3-alken-2-ols exhibit  $RC_{50}$  values between 12-22 mM.

807 The new *in vitro* method data reveal that  $\beta$ -unsaturated alcohols primarily activate an oxidative  
808 stress response, but not a DNA damage response. While straight chain  $\beta$ -olefinic alcohols induce  
809 the main HSC activation markers (i.e., COL1A1, COL3A1 and LOXL), the vinylic methyl-  
810 substituted  $\beta$ -olefinic alcohols only weakly induce these markers.

811 Endpoint specific factors affecting the prediction include the uncertainty associated with how  
812 exactly the molecular structure impacts repeated-dose toxicity. These uncertainties are  
813 considered low to moderate since the most likely metabolites are well-studied Michael acceptors,  
814 either a  $\beta$ -unsaturated aldehyde or a  $\beta$ -unsaturated ketone. Since results from cytotoxicity, fish  
815 toxicity and skin sensitization studies reveal similar structure-activity relationships, no endpoint  
816 non-specific factors affecting the predictions are identified.

817 The *ex vivo*, *in vitro* and *in chemico* data support the premise that 2-propen-1-ol, as the most  
818 potent analogue, can be read-across to other primary and secondary  $\beta$ -alkenols.

819 The *in vitro* and *in chemico* data, but not the *ex vivo* data support the argument for sub-  
820 categorization. In the sub-categorization scheme 2-propen-1-ol can be read-across to the 1-alken-  
821 3-ols and 2-alken-1-ols and 3-methyl-2-buten-1-ol is read across to 2-methyl-2-alken-1-ols, 3-  
822 methyl-2-alken-1-ols, 3-methyl-3-alken-2-ols and 4-methyl-3-alken-2-ols.

823 The net result is the uncertainty as described by Schultz et al. (2015) for these  $\beta$ -olefinic alcohols  
824 is low-to-medium. Specifically, the oral 90-day repeated-dose NOAEL of 6 and 25 mg/kg bw/d,  
825 in male and female rats, respectively, reported for 2-propen-1-ol can be read across to untested  
826 straight-chained  $\beta$ -olefinic alcohols (i.e., 1-alken-3-ols and 2-alken-1-ols) with acceptable  
827 uncertainty for all regulatory decisions including risk assessment.

828 Read-across from 2-propen-1-ol to untested methyl-substituted  $\beta$ -olefinic alcohols is a  
829 conservative prediction which may estimate lower than likely repeated-dose potencies. The oral  
830 90-day repeated-dose NOAEL values of 65.4 and 82.1 mg/kg bw/d in male and female rats,  
831 respectively, reported for 3-methyl-2-buten-1-ol, may be read across to untested branched  $\beta$ -  
832 olefinic alcohols (e.g., 2-methyl-2-alken-1-ols, 3-methyl-2-alken-1-ols, 3-methyl-3-alken-2-ols  
833 and 4-methyl-3-alken-2-ols). However the uncertainty is higher.

834

835 **Disclaimer:** *This case study has been designed to illustrate specific issues associated with read-*  
836 *across and to stimulate discussion on the topic. It is not intended to be related to any currently*  
837 *ongoing regulatory discussions on this group of compounds. The background document has been*  
838 *prepared to facilitate the discussion at the Topical Scientific Workshop and does not necessarily*  
839 *represent ECHA's position. The papers are not final publications and are solely intended for the*  
840 *purposes of the Workshop.*

841

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846

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## 993 Annex II: Template for Assessing Uncertainty for Read-Across

994 Table 1. Data Uncertainty and Weight-of-Evidence Associated with the Fundamentals of Chemical,  
995 Transformation/Toxicokinetic and Toxicological Similarity

Similarity Parameter	Data Uncertainty <sup>a</sup> (empirical, modelled) (low, medium, high)	Strength of Evidence <sup>b</sup> (low, medium, high)	Comment
Substance Identification, Structure and Chemical Classifications	Low	High	All category members are discrete organic substance of simple structure. They all have CAS numbers, similar 2D structure and belong to the same chemical class and one of five noted subclasses.
Physio-Chem & Molecular Properties	Empirical: low Modelled: low	High	All category members are appropriately similar with respect to key physicochemical and molecular properties. There is a high degree of consistency between measured and model estimated values.
Substituents, Functional Groups, & Extended Structural Fragments	Low to moderate	High	Substituents and functional groups are consistent across all category members. There is a complex extended structural fragments (see Table 1) which is accounted for in sub-categorisation
Transformation/ Toxicokinetics and Metabolic Similarity	Empirical: <i>In vivo</i> : none <i>In vitro</i> : low  Simulated: low	Medium	Due to the small size range, bioavailability is not considered a factor in these predictions. Based on high quality data for two category members, there is evidence for similar toxicokinetics and metabolic pathways (see Table 2). There is metabolic evidence suggesting some methyl-substitution affects the rate of metabolites. <i>In vivo</i> data suggests the rate of metabolism affects chronic toxicity. This can be accounted for sub-categorisation.
Potential Metabolic Products	Simulated: low	High	Based on <i>in silico</i> metabolic simulations, metabolites from oxidation are predicted to be produced by the category members (see Table 3).
Toxicophores /Mechanistic alerts	Medium	High	Based on <i>in silico</i> profilers, category member contains any established toxicophores for protein binding via metabolic activation. However, the potency of protein binding varies between the five sub-structure groups. Potency differences can be accounted for sub-categorisation.
Mechanistic	Medium	High	The available AOP hypothesized the mode of toxic action, of

Similarity Parameter	Data Uncertainty <sup>a</sup> (empirical, modelled) (low, medium, high)	Strength of Evidence <sup>b</sup> (low, medium, high)	Comment
plausibility and AOP-Related Events			all category members is related to oxidative metabolism to corresponding $\alpha$ , $\beta$ -unsaturated electrophilic aldehydes or $\alpha$ , $\beta$ -unsaturated ketones (see Table 3).
other relevant, <i>in vivo</i> , <i>in vitro</i> and <i>ex vivo</i> endpoints	Low	High	Fish <i>in vivo</i> data and <i>in vitro</i> data for cellular effects are in agreement with the electrophilic reactivity hypothesis for rodent repeated-dose toxicity.
<p>Over all chemical similarity is limited by the complexity of the extended fragment but enhanced by sub-categorisation. Similarity of chemistry within the category (i.e., five structural sub-groups) is low to moderate. Within the category data similarity and weight-of-evidence associated with the fundamentals of chemical transformation/toxicokinetic is moderate to high with uncertainty, mainly related to metabolite reactivity. Within the category data similarity and weight-of-evidence associated with toxicodynamics is low to moderate. Uncertainties associated with mechanistic relevance and completeness of the read-across (i.e., uncertainty in the predictions) are reduced with sub-categorization and the addition of “new methods” data</p> <p>Summary: Key features of chemistry are similar within the category. Key features of transformation toxicokinetics and metabolism are common within the category. Category members exhibit a Michael addition electrophilic reactivity profile with respect to <i>in chemico</i> reactivity. Category members are considered mechanistically similar; category members exhibit a Michael addition electrophilic reactivity profile with respect to <i>in vivo</i>, <i>ex vivo</i> and <i>in vitro</i> toxicity.</p>			

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<sup>a</sup>Uncertainty associated with underlying information/data used in the exercise

<sup>b</sup>Consistency within the information/data used to support the similarity rational and prediction

**Table 2. Template for Assessing Uncertainty Associated with Mechanistic Relevance and Completeness of the Read-Across**

Factor	Uncertainty (low, medium, high)	Comment
The problem and premise of the read-across	Low to Medium	The endpoint to be read across, oral 90-day repeated-dose toxicity for primary and secondary $\beta$ -olefinic alcohols is not well-studied. The scenario of the read-across hinges on metabolic similarity and the formation of electrophilic $\alpha$ , $\beta$ -unsaturated aldehydes and $\alpha$ , $\beta$ -unsaturated ketones which elicit similar reactive potency leading to hepatic and renal effects related to apoptosis and necrosis.
<b>In vivo data read across</b>		
Number of analogues in the source set	Medium; 2 of 16	There are only two suitable category member (2-propen-1-ol and 3-methyl-2-buten-1-ol) with <i>in vivo</i> apical endpoint data. These source substances represent one each for the two sub-categories (straight-chained and branched.)
Quality of the <i>in vivo</i> apical endpoint data read across	Medium	High quality empirical data for the stated regulatory endpoint exists from multiple studies for 2-propen-1-ol and a single study 3-methyl-2-buten-1-ol. These data are inconsistent in regards to qualitative and quantitative descriptions of effects. These inconsistencies are eliminated by sub-categorisation.
Severity of the apical <i>in vivo</i> hazard	Low	Potency data for the <i>in vivo</i> apical endpoint are NOAELs for 2-propen-1-ol include 6 mg/kg body weight (bw)/d in males based on increase in relative weight of liver, and 25 mg/kg bw/d in females based on bile duct hyperplasia and periportal hepatocyte hypertrophy in the liver. The 90-day oral repeated dose NOAELs for 3-methyl 2-buten-1-ol in rat were reported based on the decreased food and water consumption: 65.4 mg/kg bw/d in males and 82.1 mg/kg bw/d in females.
<b>Evidence to the biological argument for RA</b>		
Robustness of analogue data set	Low; <i>ex vivo</i> , <i>in vitro</i> and <i>in chemico</i> endpoints reveal the same structure-activity relationships.	The available data from <i>ex vivo</i> studies of category members is of high quality but limited to one representative compound of the five structural sub-groups. The available data from <i>in vitro</i> studies of category members is of high quality but limited to one representative compound of the five structural sub-structural groups. The available data from <i>in chemico</i> studies for the category members is robust, representing multiple chemicals in four of the five structural sub-groups. All the tests were judged to be reliable and conducted under the appropriate conditions.

Concordance with regard to the intermediate and apical effects and potency data	Medium; limited by lack of mechanistic plausibility.	While data is limited, there appears to be good agreement between the sequences of biochemical and physiological events leading to the <i>in vivo</i> toxicity. There is consistency and high specificity for the association between <i>in vivo</i> symptoms, and the <i>ex vivo</i> and <i>in vitro</i> data as well as the structural domains of the category. There is general agreement among the dose-response relationships of the tested category members for relevant <i>in vitro</i> and <i>in chemico</i> events.
Weight of Evidence	Low to medium	Overall the available information is consistent with the stated premise. The variation in structural (i.e., complex extended fragment) of the initial category weakens the WoE. While the toxicokinetics data is limited, the high quality <i>ex vivo</i> data (i.e., perfused liver) supports metabolism being a key factor to the category and adds to the WoE. The high quality <i>in vitro</i> data (i.e., 3D hepatic organiod) supports the metabolic-mediated fibrosis premise and adds to the WoE. The consistency within the <i>in chemico</i> data and its consistency with the <i>ex vivo</i> and <i>in vitro</i> data adds to the WoE. The fact that there is consistent relevant <i>in chemico</i> data for most if not all the category members strengthens the WoE. Sub-categorisation (straight-chained and branched) adds markedly to the WoE.
<p>Uncertainty associated with mechanistic relevance and completeness of the read-across (i.e., uncertainty in the predictions) is reduced with the addition of <i>ex vivo</i>, and <i>in chemico</i> reactivity data and sub-categorisation. Uncertainty associated with mechanistic relevance and completeness of the read-across (i.e., uncertainty in the predictions) is further reduced with the addition of “new methods” <i>in vitro</i> data. The overall uncertainty associated with the read-across predictions is judged to be low to medium.</p>		