

# A brief history of the fish embryo toxicity (FET) test

- Adam Lillicrap  
Norwegian Institute for Water Research



# 3Rs

- Reduction
- Refinement
- Replacement

# Additional Rs

- Relevance
- Reproducibility
- Regulatory Acceptance

6Rs

# Chemical hazard and risk assessment



# Acute ecotoxicity tests

– Base Set





## BEKREFTELSE

på overholdelse av  
OECD's prinsipper for God laboratoriepraksis (GLP)  
i henhold til Eus Parlaments - og Rådsdirektiv 2004/10/E

Laboratorieinspeksjon og revisjon av forsøk er gjennomført hos:

### Norsk institutt for vannforskning

#### Økotoxikologisk laboratorium

Produktgruppe	Ekspertiseområde
Industrikjemikalier	Fysisk - kjemisk testing
Industrikjemikalier	Økotoxikologiske undersøkelser på akvatisk og terrestriske organismer

**Dato for besøket: 15.02.2016 -16.02.2016**

Laboratoriet er innført i Norsk akkrediterings register over  
GLP-inspiserte laboratorier og er  
underlagt bestemmelsene i Norsk akkrediterings GLP-ordning

**Registreringsnummer: GLP 007**

Neste ordinære GLP-inspeksjon vil finne sted innen 2 år og 6 måneder.

NORSK AKKREDITERING

20.12.2016

Dato

  
Norsk akkreditering



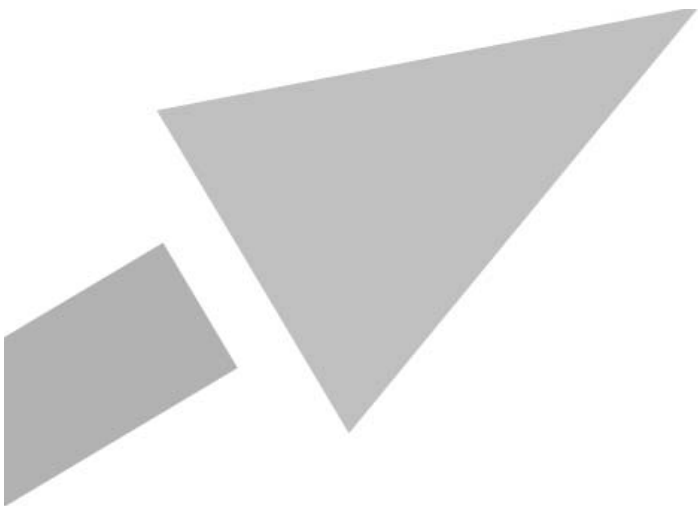
# Historic perspective

[www.ecetoc.org/wp-content/uploads/2014/08/ECETOC-TR-097.pdf](http://www.ecetoc.org/wp-content/uploads/2014/08/ECETOC-TR-097.pdf)

*Alternative Testing Approaches in  
Environmental Safety Assessment*

Technical Report No. 97

ISSN-0773-8072-97  
Brussels, December 2005



*Workshop on Alternative Testing  
Approaches in Environmental  
Risk Assessment  
7-9 July 2004, Crécy-la-Chapelle*

Workshop Report No. 5

*Aims*

- Identify methodology for generating information for environmental risk assessment, in line with the 3Rs;
- identify research to address knowledge gaps in the proposed methodology;
- draft research plans including potential funding opportunities, collaborations and timelines to develop alternative methodologies to address the environmental safety of chemicals.

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- [Acceptance of technology](#) >

## ECO8: Development of a strategy to predict acute fish lethality using fish cell lines and fish embryos

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**PUBLICATIONS**



A mini guide to **CEFIC-LRI FUNDING**

## Testing acute toxicity in the embryo of zebrafish, *Brachydanio rerio*, as an alternative to the acute fish test: preliminary results [1994]

Schulte, C.

Nagel, R.

### Abstract



Acute toxicity testing in fish is a standard method used in estimating the influences of chemicals on aquatic vertebrates. The ecotoxicological data obtained from acute toxicity tests in fish are however, not sufficiently reliable to justify the continued use of this test. Fertilised eggs of zebrafish (*Brachydanio rerio*) were used to test the acute toxicity of chemicals. They were chosen because the development of *B. rerio* has been studied extensively and information already exists concerning the normal development of this species. The following parameters of the development of *B. rerio* were observed: coagulation of the egg, gastrulation, number of somites, movement, development of organs, pigmentation, heartbeat and circulation. Some of these toxicological endpoints indicate lethality. In addition, various interactions between the test chemical and the embryos can be measured by investigating these parameters. Six chemicals (2,4-dinitrophenol, 4,6-dinitro-*o*-cresol, malathion, carbaryl, phenol and 4-nitrophenol) were selected for testing in the embryos of zebrafish within the first 48 hours of their development. The toxicities of the test chemicals to zebrafish embryos were compared with their acute toxicities to adult fish. Further investigations with more chemicals are in progress. The effective concentrations (EC50) and the lowest effect concentrations (LOEC) investigated in this preliminary study were comparable to the LC50 values for adult fish. The u



# **OECD GUIDELINE FOR THE TESTING OF CHEMICALS**

## **DRAFT PROPOSAL FOR A NEW GUIDELINE**

### **Fish Embryo Toxicity (FET) Test**

#### **INTRODUCTION**

1. This Test Guideline describes a Fish Embryo Toxicity (FET) test mainly developed for use with the zebrafish (*Danio rerio*) but the test method can also be adapted to fathead minnow (*Pimephales promelas*), Japanese medaka (*Oryzias latipes*) and other relevant species of interest (1). This Guideline intends to define lethal effects of chemicals on embryonic stages of fish and constitute an alternative test method to the acute toxicity tests with juvenile and adult fish, *i.e.*, the OECD Test Guideline 203 (2), thus providing a reduction in fish usage. The FET-test is mainly developed from studies and validation activities performed on zebrafish (1)(3)(4)(5)(6)(7)(8)(9)(10)(11)(12)(13)(14)(15)(16)(17)(18), but also from studies on fathead minnow (1)(19)(20)(21)(22) and Japanese medaka (1)(23)(24)(25)(26)(27)(28)(29).

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## OECD validation study on the transferability, intra- and inter-laboratory reproducibility of the Zebrafish Embryo Toxicity Test (ZFET)

**F. Busquet<sup>1</sup>, S. Belanger<sup>2</sup>, T. Braunbeck<sup>3</sup>, G. Carr<sup>2</sup>, M. Halder<sup>1</sup>, A. Lillicrap<sup>4</sup>, J. Rawlings<sup>2</sup>, R. Strecker<sup>3</sup>, S. Walter-Rohde<sup>5</sup> and P. Amcoff<sup>6</sup>**

*1 European Commission JRC/IHCP/ECVAM, Ispra, ITALY, 2 Procter & Gamble, Cincinnati, OH, U.S.A., 3 University of Heidelberg, Heidelberg, GERMANY, 4 NIVA, Oslo, NORWAY, 5 UBA, Dessau-Rosslau, GERMANY, 6 OECD, Environment, Health and Safety Division, Environment Directorate, Paris, FRANCE*

*"Disclaimer: The opinions expressed and the arguments employed herein are those of the authors and do not necessarily reflect the official views of the OECD or of the governments of its member countries"*

### Introduction

- One of the most promising alternative approaches to the 96h LC50 acute fish toxicity test (OECD TG 203) is based on the use of zebrafish embryos.
- In fall 2005, the German Federal Environment Agency (UBA) submitted the draft test guideline "Fish embryo toxicity (FET) test" to the OECD Test Guideline Program together with a Background Paper.
- OECD established the *ad hoc* Expert Group on the Fish Embryo Toxicity Test and based on the outcome of expert meetings, OECD decided to perform a validation study (coordinated by ECVAM and steered by a validation management group).
- The validation study involves several international laboratories in order to evaluate the transferability of the zebrafish embryo toxicity test (ZFET) and assess its intra- and inter-laboratory reproducibility.



**Unclassified**

**ENV/JM/MONO(2011)37**

Organisation de Coopération et de Développement Économiques  
Organisation for Economic Co-operation and Development

**25-Aug-2011**

**English - Or. English**

**ENVIRONMENT DIRECTORATE  
JOINT MEETING OF THE CHEMICALS COMMITTEE AND  
THE WORKING PARTY ON CHEMICALS, PESTICIDES AND BIOTECHNOLOGY**

**Cancels & replaces the same document of 23 August 2011**

**VALIDATION REPORT (PHASE 1) FOR THE ZEBRAFISH EMBRYO TOXICITY TEST  
PART I**

**Series on Testing and Assessment**

**No. 157**



**ENV/JM/MONO(2011)37  
Unclassified**

**Unclassified**

**ENV/JM/MONO(2012)25**

Organisation de Coopération et de Développement Économiques  
Organisation for Economic Co-operation and Development

**10-Aug-2012**

**English - Or. English**

**ENVIRONMENT DIRECTORATE  
JOINT MEETING OF THE CHEMICALS COMMITTEE AND  
THE WORKING PARTY ON CHEMICALS, PESTICIDES AND BIOTECHNOLOGY**

**ENV/JM/MONO(2012)25  
Unclassified**





























**VALIDATION REPORT (PHASE 2) FOR THE ZEBRAFISH EMBRYO TOXICITY TEST**

**Series on Testing and Assessment**

**No. 179**



## OECD validation study to assess intra- and inter-laboratory reproducibility of the zebrafish embryo toxicity test for acute aquatic toxicity testing

François Busquet<sup>a, 1, 2</sup> , Ruben Strecker<sup>b, 1, 3</sup> , Jane M. Rawlings<sup>c, 1</sup> , Scott E. Belanger<sup>c</sup> , Thomas Braunbeck<sup>b</sup> , Gregory J. Carr<sup>d</sup> , Peter Cenijn<sup>e</sup> , Przemyslaw Fochtman<sup>f</sup> , Anne Gourmelon<sup>g</sup> , Nicole Hübler<sup>h</sup> , André Kleensang<sup>a, 4</sup> , Melanie Knöbel<sup>i, 5</sup> , Carola Kussatz<sup>j</sup> , Juliette Legler<sup>e</sup> , Adam Lillicrap<sup>k</sup> , Fernando Martínez-Jerónimo<sup>l</sup> , Christian Polleichtner<sup>i</sup> , Helena Rzodeczko<sup>f</sup> , Edward Salinas<sup>m</sup> , Katharina E. Schneider<sup>m, 6</sup> , Stefan Scholz<sup>i</sup> , Evert-Jan van den Brandhof<sup>n</sup> , Leo T.M. van der Ven<sup>o</sup> , Susanne Walter-Rohde<sup>p</sup> , Stefan Weigt<sup>h</sup> , Hilda Witters<sup>q</sup> , Marlies Halder<sup>a</sup>  

# OECD GUIDELINE FOR THE TESTING OF CHEMICALS

## DRAFT PROPOSAL FOR A NEW GUIDELINE

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## OECD GUIDELINES FOR THE TESTING OF CHEMICALS

### Fish Embryo Acute Toxicity (FET) Test

#### INTRODUCTION

1. This Test Guideline (TG) 236 describes a Fish Embryo Acute Toxicity (FET) test with the zebrafish (*Danio rerio*). This test is designed to determine acute toxicity of chemicals on embryonic stages of fish. The FET-test is based on studies and validation activities performed on zebrafish (1)(2)(3)(4)(5)(6)(7)(8)(9)(10)(11)(12)(13)(14). The FET-test has been successfully applied to a wide range of substances exhibiting diverse modes of action, solubilities, volatilities, and hydrophobicities (reviewed in 15 and 16).

## The fish embryo test (FET): origin, applications, and future.

Braunbeck T<sup>1</sup>, Kais B<sup>2</sup>, Lammer E<sup>2</sup>, Otte J<sup>2</sup>, Schneider K<sup>2</sup>, Stengel D<sup>2</sup>, Strecker R<sup>2</sup>.

### Author information

#### Abstract

Originally designed as an alternative for the acute fish toxicity test according to, e.g., OECD TG 203, the fish embryo test (FET) with the zebrafish (*Danio rerio*) has been optimized, standardized, and validated during an OECD validation study and adopted as OECD TG 236 as a test to assess toxicity of embryonic forms of fish. Given its excellent correlation with the acute fish toxicity test and the fact that non-feeding developmental stages of fish are not categorized as protected stages according to the new European Directive 2010/63/EU on the protection of animals used for scientific purposes, the FET is ready for use not only for range-finding but also as a true alternative for the acute fish toxicity test, as required for a multitude of national and international regulations. If-for ethical reasons-not accepted as a full alternative, the FET represents at least a refinement in the sense of the 3Rs principle. Objections to the use of the FET have mainly been based on the putative lack of biotransformation capacity and the assumption that highly lipophilic and/or high molecular weight substances might not have access to the embryo due to the protective role of the chorion. With respect to bioactivation, the only substance identified so far as not being activated in the zebrafish embryo is allyl alcohol; all other biotransformation processes that have been studied in more detail so far were found to be present, albeit, in some cases, at lower levels than in adult fish. With respect to larger molecules, the extension of the test duration to 96 h (i.e., beyond hatch) has-at least for the substances tested so far-compensated for the reduced access to the embryo; however, more research is necessary to fully explore the applicability of the FET to substances with a molecular weight >3 kDa as well as substances with a neurotoxic mode of action. An extension of the endpoints to also cover sublethal endpoints makes the FET a powerful tool for the detection of teratogenicity, dioxin-like activity, genotoxicity and mutagenicity, neurotoxicity, as well as various forms of endocrine disruption.

# Analysis of the Fish Embryo Acute Toxicity (FET) OECD TG 236 in the context of fulfilling the information requirements of the REACH Regulation

Marta Sobanska<sup>1</sup>, Romanas Cesnaitis<sup>1</sup>, Simon Gutierrez Alonso<sup>1</sup>, Anna-Maija Nyman<sup>1</sup>, Laurence Deydier<sup>1</sup>, Nina Falk<sup>1</sup>, Francesca Pellizzato<sup>1</sup>, Stefan Scholtz<sup>2</sup>, Nils Klüver<sup>2</sup>, Ralph Kühne<sup>2</sup>, Derek Knight<sup>1</sup>, Wim de Coen<sup>1</sup>

1. ECHA, Annankatu 18, FI-00121 Helsinki, Finland

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**Analysis of the relevance and adequateness of using Fish Embryo Acute Toxicity (FET) Test Guidance (OECD 236) to fulfil the information requirements and addressing concerns under REACH**

14.04.2016

Dr. Stefan Scholz

- [https://echa.europa.eu/documents/10162/13639/fet\\_report\\_en.pdf](https://echa.europa.eu/documents/10162/13639/fet_report_en.pdf)



Generally, a lack of quality data makes it challenging to conclude on several aspects of the applicability domain of FET. However, as the OECD TG 236 was published in 2013, it could possibly lead to more data being generated in the near future, which can be used for comparative analysis. This might also give more information on a wider range of substances (multi-constituents and UVCBs) and result in more certainty for hydrophobic or volatile substances. It is recommended that whenever possible the FET studies (especially with hydrophobic or volatile substances) are accompanied by chemical analytics for the verification of exposure concentrations and the additional evidence that the substance would fall within the applicability domain of FET.



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## **Is the Fish Embryo Acute Toxicity Test Under Threat? A Perspective from the SETAC Global Animal Alternatives Advisory Group**

Adam Lillicrap, Norwegian Institute for Water Research (NIVA); Scott Belanger, Procter & Gamble; Natalie Burden, NC3Rs; Michelle Embry, ILSI-HESI; Lucy Lee, University of the Fraser Valley; and Marc Léonard, L’Oreal



[Return to the Globe](#)

After nearly eight years of formal development, a previous decade of investigational science and the most rigorous validation exercise for any new ecotoxicity test guideline to demonstrate reliability, robustness and repeatability, the Organization for Economic Co-operation and Development (OECD) fish embryo acute toxicity (FET) test guideline was officially adopted in 2013.<sup>5, 4, 2</sup> The test had already been previously adopted in Germany for assessing the acute toxicity of wastewater effluents in place of an acute fish

## Aquatic

### UPDATE OF THE TEST GUIDELINES

- OECD 209: Activated Sludge, Respiration Inhibition Test (Carbon and Ammonium Oxidation)
- OECD 210: Fish, Early-life Stage Toxicity Test
- OECD 211: Daphnia magna Reproduction Test

The following guidelines, directly relevant for REACH registration dossiers, have been updated improving different elements. The new updated guidelines represent a scientific enhancement and are directly relevant for addressing the REACH information requirements within the scope mentioned in the ECHA guidance documents for the previous versions:

### NEWLY ADOPTED TEST GUIDELINES

#### OECD 236: Fish Embryo Acute Toxicity test (FET)

**Title of the test guideline and the year of approval:** OECD 236: Fish Embryo Acute Toxicity (FET) test, 2013

**Keywords:** acute fish toxicity, fish embryo toxicity, animal alternatives

**Link to the OECD site:** [http://www.oecd-ilibrary.org/environment/test-no-236-fish-embryo-acute-toxicity-fat-test\\_9789264203709-en](http://www.oecd-ilibrary.org/environment/test-no-236-fish-embryo-acute-toxicity-fat-test_9789264203709-en)

#### How to use this method under REACH:

The short-term toxicity test on fish is a standard information requirement under Annex VIII, 9.1.3. In ECHA's opinion, the results of the TG 236 would usually not be sufficient alone to meet the information requirement of Annex VIII, 9.1.3.

In the light of the analysis made by ECHA, there are certain limitations in the use of this test guideline and the registrant, who wants to adapt/waive the standard test needs to take these limitations into account.

Based on current knowledge, ECHA considers that OECD TG 236 might be used within a weight of evidence approach together with other independent, adequate, relevant and reliable sources of information leading to the conclusion that the substance has or does not have a particular dangerous property (for further information see Annex XI, 1.2 to the REACH Regulation and the considerations below).

[https://echa.europa.eu/documents/10162/21650280/oecd\\_test\\_guidelines\\_aquatic\\_en.pdf/2548af92-ffe1-4e38-a42a-463103b1586f](https://echa.europa.eu/documents/10162/21650280/oecd_test_guidelines_aquatic_en.pdf/2548af92-ffe1-4e38-a42a-463103b1586f)

# Practical guide for SME managers and REACH coordinators

## How to fulfil your information requirements at tonnages 1-10 and 10-100 tonnes per year

Version 1.0 – July 2016

- [https://echa.europa.eu/documents/10162/13655/pg\\_sme\\_managers\\_reach\\_coordinators\\_en.pdf/1253d9f9-d1f0-4ca8-9e7a-c81e337e3a7d](https://echa.europa.eu/documents/10162/13655/pg_sme_managers_reach_coordinators_en.pdf/1253d9f9-d1f0-4ca8-9e7a-c81e337e3a7d)

### **Additional tips**

Short-term toxicity tests with freshwater species are preferred but if a substance is released mainly directly into seawater, tests with marine species are more relevant.

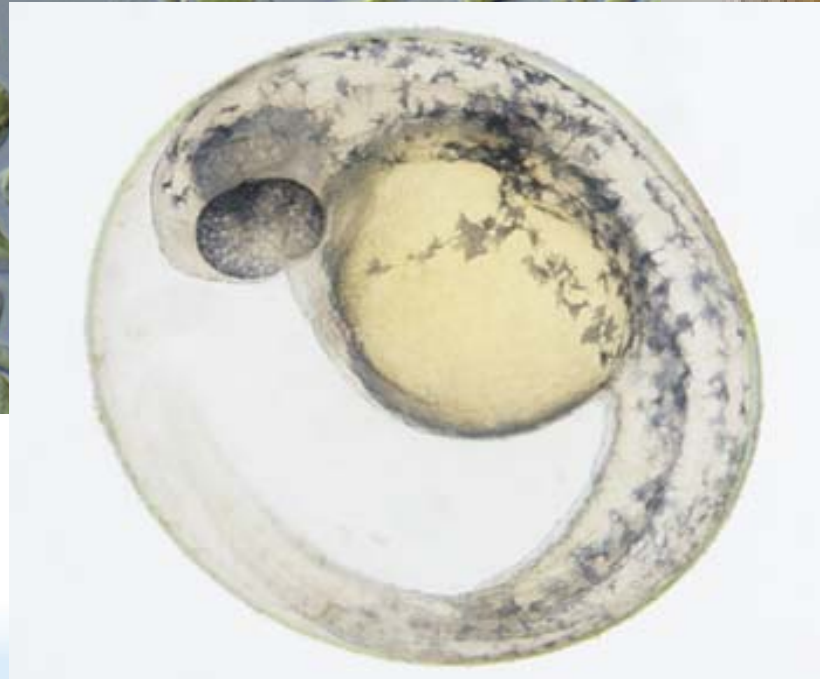
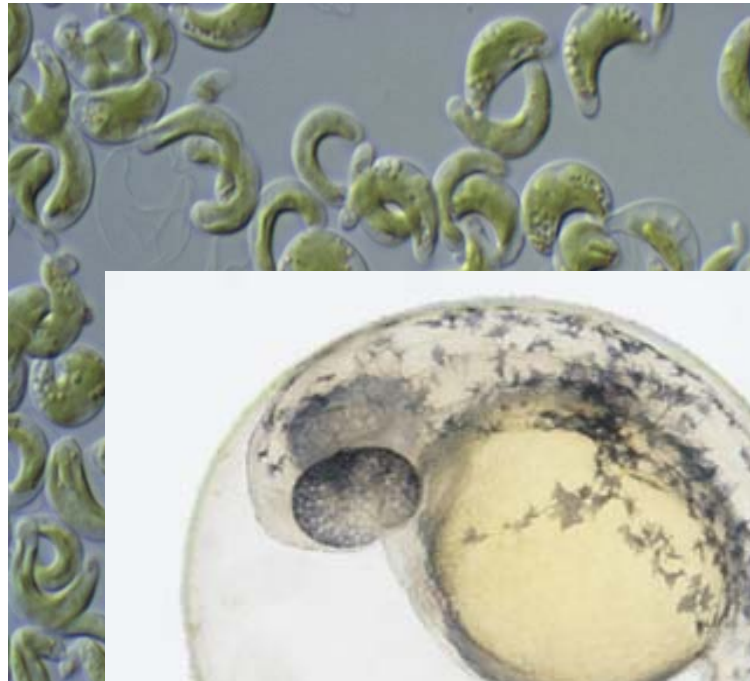
Aquatic toxicity is 'unlikely to occur' when the substance is highly insoluble in water or when the substance is likely not to cross biological membranes.

Remember that to reduce the number of tests on animals, animal testing is the last option and you have to consider the possibilities to use alternative methods. The OECD TG 236 Fish Embryo Acute Toxicity (FET) Test is an alternative to the standard test and could be used within a weight-of-evidence approach together with other supporting information justifying the reliability and adequacy of the test.

OECD developed a fish testing strategy to avoid (reduce) testing (OECD Short Guidance on the Threshold Approach for Acute Fish Toxicity (No. 126, 2010) and OECD Guidance on Fish Toxicity Testing Framework (No. 171, 2012)).

# Acute ecotoxicity tests

– Base Set



- Standardization is key to utilizing alternative approaches in a regulatory context
- Any method takes a significant amount of validation
- Use in a weight of evidence context is important
  - Relevance
  - Reproducibility/repeatability
    - Regulatory Acceptance
    - 6Rs



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## Using fewer animals to assess environmental safety

Friday 03 February 2017

A recent cross-sector review has highlighted several key approaches available for ecotoxicologists and risk assessors to evaluate potentially hazardous chemicals, while minimising the use of vertebrates. The Focus article has been published in *Environmental Toxicology and Chemistry* by the steering committee of the Society of Environmental Toxicology and Chemistry (SETAC) Animal Alternatives in Environmental Science Interest Group.



SETAC is the major society connecting environmental scientists, with over 6,000 members from almost 100 countries. The role of the Animal Alternatives Interest Group is to foster discussion of key technical challenges for the future of the 3Rs in environmental science. The team who put together this publication includes contributors from regulatory bodies, academia, industry and SMEs from Europe and North America. [Dr Natalie Burden](#), one of our Programme Managers for toxicology and regulatory sciences, is a co-author of the paper.

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<https://www.nc3rs.org.uk/news/using-fewer-animals-assess-environmental-safety>

NIVA





Focus Article

## Alternative approaches to vertebrate ecotoxicity tests in the 21st century: A review of developments over the last 2 decades and current status

Adam Lillicrap , Scott Belanger, Natalie Burden, David Du Pasquier, Michelle R. Embry, Marlies Halder, Mark A. Lampi, Lucy Lee, Teresa Norberg-King, Barnett A. Rattner, Kristin Schirmer, Paul Thomas

First published: 25 October 2016 [Full publication history](#)

DOI: 10.1002/etc.3603 [View/save citation](#)

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<http://onlinelibrary.wiley.com/doi/10.1002/etc.3603/full>

## Alternative Approaches to Vertebrate Ecotoxicity Tests in the 21st Century: A Review of Developments Over the Last 2 Decades and Current Status

Adam Lillicrap,\*† Scott Belanger,‡ Natalie Burden,§ David Du Pasquier,|| Michelle R. Embry,# Marlies Halder,†† Mark A. Lampi,††† Lucy Lee,§§ Teresa Norberg-King,|||| Barnett A. Rattner,## Kristin Schirmer,††††§§§ and Paul Thomas###

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†††Eawag—Swiss Federal Institute of Aquatic Science and Technology, Dübendorf, Switzerland

§§§Institute of Biogeochemistry and Pollutant Dynamics, ETH Zürich, Swiss Federal Institute of Technology, Zürich, Switzerland

|||||School of Architecture, Civil and Environmental Engineering, EPF Lausanne, Lausanne, Switzerland

###Consultancy for Environmental & Human Toxicology & Risk Assessment (Lyon Agency), L'Isle d'Abeau, France

**Abstract**—The need for alternative approaches to the use of vertebrate animals for hazard assessment of chemicals and pollutants has become of increasing importance. It is now the first consideration when initiating a vertebrate ecotoxicity test, to ensure that unnecessary use of vertebrate organisms is minimized whenever possible. For some regulatory purposes, the use of vertebrate organisms for environmental risk assessments has been banned; in other situations, the number of organisms tested has been dramatically reduced or the severity of the procedure refined. However, there is still a long way to go to achieve a complete replacement of vertebrate organisms to generate environmental hazard data. The development of animal alternatives is based not just on ethical considerations but also on reducing the cost of performing vertebrate ecotoxicity tests and in some cases on providing better information aimed at improving environmental risk assessments. The

present Focus article provides an overview of the considerable advances that have been made toward alternative approaches for ecotoxicity assessments over the last few decades. *Environ Toxicol Chem* 2016;35:2637–2646. © 2016 SETAC

**Keywords**—Ecotoxicity; Vertebrate; In vitro; In silico; 3Rs

### Introduction

The book on the principles of humane experimental techniques by Russell and Burch [1] is now more than half of a century old, and still it is considered the seminal writing for alternative approaches to animal testing. This is where the idea of the 3Rs (reduction, refinement, and replacement) was conceived: that any experimental technique should consider a reduction in numbers of animals used; refinement of any procedures to minimize pain, suffering, and distress; and replacement of the use of animals wherever possible. Yet the

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