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- <sup>3</sup> Food allergy population thresholds: An evaluation of the number of oral
- <sup>4</sup> food challenges and dosing schemes on the accuracy of threshold dose
- <sup>5</sup> distribution modeling

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#### ABSTRACT

For most allergenic foods, limited availability of threshold dose information within the population restricts the advice on action levels of unintended allergenic foods which should trigger advisory labeling on packaged foods.

The objective of this paper is to provide guidance for selecting an optimal sample size for threshold dosing studies for major allergenic foods and to identify factors influencing the accuracy of estimation. A simulation study was performed to evaluate the effects of sample size and dosing schemes on the accuracy of the threshold distribution curve. The relationships between sample size, dosing scheme and the employed statistical distribution on the one hand and accuracy of estimation on the other hand were obtained. It showed that the largest relative gains in accuracy are obtained when sample size increases from N = 20 to N = 60. Moreover, it showed that the EuroPrevall dosing scheme is a useful start, but that it may need revision for a specific allergen as more data become available, because a proper allocation of the dosing steps is important.

The results may guide risk assessors in minimum sample sizes for new studies and in the allocation of proper dosing schemes for allergens in provocation studies.

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#### 45 **1. Introduction**

Clinical oral food allergy provocation studies and the threshold 46 47 dose information they produce provide valuable information on the sensitivity of the allergic populations/patients. Several studies 48 with a variety of allergenic foods tested show that the individual 49 50 threshold, or lowest observed adverse effect level (LOAEL), varies within the food allergic population (Ballmer-Weber et al., 2007; 51 Wensing et al., 2002a; Wensing et al., 2002b). The dose distribution 52 53 studies of Taylor et al. (2009, 2010) observed a variation of 5-6 54 orders of magnitude within the peanut allergic population. Studies with other allergens also show this wide variation in clinical LOA-55 ELs (Blom et al., 2013). Thus all individuals within an allergic 56

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http://dx.doi.org/10.1016/j.fct.2014.05.001 0278-6915/© 2014 Elsevier Ltd. All rights reserved. population are not at the same level of risk of having an allergic reaction.

Threshold-based risk approaches have long been used for the management of chemical and microbial hazards in food but have not been widely adopted by regulatory agencies in the management of food allergens (EU, 2003; Kroes et al., 2000; Lammerding and Fazil, 2000; Larsen, 2006; Notermans et al., 1995). Food allergen thresholds have different meanings to different stakeholders. To the food allergic consumer, their personal threshold or LOAEL is the smallest amount of food required to cause an allergic reaction. The population threshold could be the amount of food required to cause a reaction in the most sensitive individual or in a determined percentage of the food allergic population. To the food industry and regulatory bodies, the term threshold could determine how much allergen would trigger a product recall if unlabeled or when to place an advisory statement on the label if allergens are occasionally present due to cross-contact despite industry's best efforts to minimize the unintended presence of allergen through good manufacturing and cleaning practices. The

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Abbreviations: DBPCFC, double-blind placebo-controlled food challenge; NOAEL, no observed adverse effect level; LOAEL, lowest observed adverse effect level; ED, eliciting dose.

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importance of food allergy as a public health and food safety issue
has placed pressure on the food industry and regulatory agencies
to implement threshold-based strategies to protect the food allergic consumer.

In the absence of guidance from public health authorities 80 81 regarding thresholds, the food industry has implemented the wide-82 spread use of various forms of voluntary advisory or precautionary 83 "may contain" labeling in an attempt to manage the risk and pro-84 tect food-allergic consumers. However, as a result of the wide-85 spread use of advisory labels, the quality-of-life of food-allergic 86 consumers has decreased due to the ever decreasing number of food choices available and some are ignoring these advisory state-87 ments (Hefle et al., 2007; Hourihane et al., 2011). Additionally, the 88 widespread use of advisory labeling has led to varying advice 89 90 within the medical community on whether patients should avoid 91 all foods with advisory labeling (Koplin et al., 2010; Vierk et al., 92 2007). Acceptance of management thresholds by regulatory 93 authorities could benefit allergic consumers as there would be 94 more transparency in the use of advisory labeling by food industry 95 but they should never be advised to ignore advisory statements on 96 package labels (Taylor and Hefle, 2006). All stakeholders present in 97 a workshop organized and reported by Madsen et al. (2012) (regulators, food industry, clinical researchers and healthcare profes-98 sionals, and food-allergic consumers) agreed it is essential to 99 100 address the current lack of action levels and thresholds for food 101 allergen labeling, but it is difficult to define and quantify a level 102 of tolerable or accepted risk (Madsen et al., 2012). There is an obvi-103 ous need for research and scientific advancement in the area of 104 food allergen thresholds.

105 The threshold dose information is the base for formulating ideas 106 to define action levels for precautionary warnings for major allergens. The FDA Threshold Working Group and others have agreed 107 108 that allergic population thresholds and a quantitative risk assessment-based approach provides the strongest, most transparent sci-109 110 entific analyses to establish thresholds for the major food allergens 111 (Gendel et al., 2008; Madsen et al., 2009; Spanjersberg et al., 2007). 112 However, the quantitative (probabilistic) approach has only 113 recently been applied to food allergens (Kruizinga et al., 2008; 114 Rimbaud et al., 2010; Spanjersberg et al., 2010; Spanjersberg 115 et al., 2007). The FDA Threshold Working Group stated that data 116 available in 2006 were not sufficient to meet the requirements of 117 the quantitative approach and that a research program should be 118 initiated to develop applicable risk assessment tools and to acquire 119 and evaluate the clinical and epidemiological data needed to support the quantitative risk assessment-based approach (Gendel 120 121 et al., 2008). Recent work by the Netherlands Organisation for 122 Applied Scientific Research (TNO) in the Netherlands and the Food 123 Allergy Research and Resource Program (FARRP) at the University 124 of Nebraska utilized published low dose double-blind, placebo-125 controlled oral food challenges (DBPCFC) for 13 priority allergens 126 and additional unpublished data from allergy clinics in Europe to accumulate over 1800 individual allergic thresholds from DBPCFCs 127 (Taylor et al., 2014; Allen et al., 2014). In the review of the Volun-128 tary Incidental Trace Allergen Labelling program (VITAL<sup>®</sup>), the 129 130 team of experts rigorously searched literature and collected unpublished threshold information for peanut, egg, soy flour, and 131 10 other priority allergenic foods with the purpose of threshold 132 dose distribution modeling. The collation of all threshold data 133 showed that for some allergenic foods, threshold dose information 134 135 was available for more than 200 individuals (peanut, hazelnut, milk and egg), whereas for many other allergenic foods smaller 136 137 datasets (<80) were available (Taylor et al., 2014; Allen et al., 138 2014). For each dataset, the individual No Observed Adverse Effect 139 Levels (NOAEL) and the LOAELs were combined to derive popula-140 tion threshold dose distribution curves for each allergenic food 141 Q3 using the dose distribution approach as described in Crevel et al.

(2008), together with survival analysis methods as used in Taylor 142 et al. (2009, 2010). This approach is widely accepted as one that 143 uses the available data most effectively (Gendel et al. 2008; 144 Madsen et al., 2009). In selecting the eliciting dose (ED) for the 145 allergic population (in which the EDx represents the dose at which 146 x% of the allergic population would be expected to react with 147 objective symptoms), weight was given to the goodness of fit for 148 each parametric model (determined by the log likelihood) as well 149 as visual examination of the fitted probability distribution. 150

Threshold dose distributions are a crucial component in the quantitative risk assessment to estimate the number of allergic reactions within the allergic population. Threshold-based assessments provide quantitative insight to the health risk associated with the level of allergenic food present in a typical food product (Spanjersberg et al., 2010; Rimbaud et al., 2013; Remington et al., 2013). To generate more fundamental scientific underpinning for the number of data points desirable to establish sound regulatory threshold distributions for food allergy, we set up a simulation study using the peanut, egg, and soy flour threshold data as reference distributions to investigate the effects of the number of allergic individuals included in the population threshold analysis (*N*), censoring, and the dose scheme used at challenge.

#### 2. Methods

The reference distributions for the simulation study were based on discrete NOAEL and LOAEL values from 750 individual DBPCFCs for peanut, 206 for egg. and 51 for soy flour (Allen et al., 2014; Taylor et al., 2014). The population thresholds for peanut, egg, and soy flour were used as model allergens due to their differences in population sensitivity (egg > peanut > soy flour). Three commonly used distribution functions; the log-normal, log-logistic and Weibull distribution, were fitted to this data using PROC LIFEREG in SAS v9.1 (SAS Research Institute). We do acknowledge that the VITAL® Scientific Expert Panel determined that the Weibull distribution did not provide a good fit to the actual threshold data for peanut and was not used in the derivation of a reference dose for peanut. However, this paper deals with the general task of studying sample size and dosing scheme effects and therefore it is important to include the Weibull distribution as a reference distribution. From the estimated distributions, the 1st percentile (ED01), the 5th percentile (ED05), the 10th percentile (ED10) and the 50th percentile (ED50) (the dose at which 1%, 5%, 10% or 50% of the allergic population would be predicted to react with objective symptoms) were obtained for peanut (Table 1), egg (Table 2), and soy flour (Table 3).

Those estimated distributions are used as reference distributions in the simulations presented below. For the purpose of the simulations, it will be assumed that the selected reference distribution is the true distribution to be recovered with a selected sample size and dosing scheme. Note that there is therefore no relationship with the determination of the best fitting distribution for the analysis of a specific data set at hand.

#### 2.2. Factors varied in the simulation study

Based on information of historical dose–response studies, the following factors were identified that are important in the modeling of the threshold distribution and estimation of the ED's.

Distribution: The statistical distribution that was fitted to the data is often one of the following three parametric survival models: the log-logistic (LL), the log-normal (LN), or the Weibull (WB) distribution. The behavior in the tails of those distributions may differ (see Fig. 1 and Tables 1–3), and therefore the distribution chosen is a relevant factor for estimating the EDs.

Dosing scheme: The dosing scheme in a threshold study is an important factor because it determines the range covered and the step sizes taken in the dosing levels. To investigate the effect of different dosing levels, four dosing schemes were developed based on the dosing scheme used in the clinical challenges associated with the EuroPrevall research project, a multi-center study on the prevalence, cost, and basis of food allergy in Europe (Defernez et al., 2013). The number of dosing levels was bounded by 9, which corresponds to the maximum number of escalating doses of allergenic food a clinician can typically administer to a patient on one day. The following dosing schemes were applied in the simulations:

 Normal EuroPrevall (NEP): a low-dose clinical consensus protocol for diagnosis representing maximum coverage of the dosing scale as found in the empirical data (Crevel et al., 2008; Defernez et al., 2013). The dosing levels are 0.003, 0.03, 0.3, 3, 30, 100, 300, 1000 and 3000 mg protein from the allergenic source.

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