

Implementing systematic review techniques in chemical risk assessment: challenges, opportunities and recommendations

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38 necessarily represent the views or policies of their employers or otherwise affiliated
39 organisations.

40 **Abstract**

41 Systematic review (SR) is a rigorous, protocol-driven approach designed to minimise error
42 and bias when summarising the body of research evidence relevant to a specific scientific
43 question. Taking as a comparator the use of SR in synthesising research in healthcare, we argue
44 that SR methods could also pave the way for a “step change” in the transparency, objectivity and
45 communication of chemical risk assessments (CRA) in Europe and elsewhere. We suggest that
46 current controversies around the safety of certain chemicals are partly due to limitations in
47 current CRA procedures which have contributed to ambiguity about the health risks posed by
48 these substances. We present an overview of how SR methods can be applied to the assessment
49 of risks from chemicals, and indicate how challenges in adapting SR methods from healthcare
50 research to the CRA context might be overcome. Regarding the latter, we report the outcomes
51 from a workshop exploring how to increase uptake of SR methods, attended by experts
52 representing a wide range of fields related to chemical toxicology, risk management and SR.
53 Priorities which were identified include: the conduct of CRA-focused prototype SRs; the
54 development of a recognised standard of reporting and conduct for SRs in toxicology and CRA;
55 and establishing a network to facilitate research, communication and training in SR methods.
56 We see the workshop and this paper as a logical step in the creation of a research climate that
57 fosters communication between experts in CRA and SR and facilitates wider uptake of SR
58 methods into CRA.

59 **Keywords:** evidence; human health; toxicology; risk; environment

60 **1. Introduction**

61 Systematic review (SR) is a rigorous, protocol-driven approach to minimising error and bias¹
62 in the aggregation and appraisal of evidence relevant to answering a research question. SR
63 techniques were initially developed in the fields of psychology, social science and health care
64 and have, since the 1980s, provided a valuable tool for evidence-informed decision-making
65 across many domains (Lau et al. 2013). In medicine, SRs have provided a valuable response to
66 the need for consistent, transparent and scientifically-robust interpretations of the results of
67 increasing numbers of often conflicting studies of the efficacy of healthcare interventions. SRs
68 have taken on an increasingly fundamental role both in supporting decision-making in
69 healthcare and, by channelling resources towards questions for which the answers are not yet
70 known, reducing waste in research (Chalmers, Glasziou 2009; Salman et al. 2014). It is now
71 accepted practice in healthcare to use SR methods to assess evidence not only for the efficacy of
72 interventions, but diagnostic tests, prognostics and adverse outcomes.

73 The extension of SR techniques to other fields is based on a mutual need across disciplines to
74 make the best use of existing evidence when making decisions, a move for which momentum
75 has been growing for several decades. For example, the What Works Clearinghouse was
76 established in 2002 to apply SR techniques in support of American educational policy (US
77 Institute of Education Sciences 2015), and in 2000 the international Campbell Collaboration
78 research network was convened to undertake and disseminate systematic reviews on the
79 effects of social interventions in diverse fields such as crime and justice, education, international
80 development and social welfare (Campbell Collaboration 2015). Meta-analysis and SR in
81 ecology have contributed to evidence-based environmental policy since the mid-1990s (Stewart
82 2010); more recently, the Collaboration for Environmental Evidence (CEE) has been established
83 to encourage conduct of SRs on a wide range of environmental topics (Collaboration for
84 Environmental Evidence 2015).

85 The potential advantages of adapting SR methodology to the field of chemical risk
86 assessment (CRA) have also been recognised and multiple research groups and organisations
87 have adopted (Woodruff, Sutton 2014; Birnbaum et al. 2013; European Food Safety Authority
88 2010; Rooney et al. 2014) or recommended (US National Research Council 2014a, 2014b; US

¹ It is worth drawing a distinction between three sources of bias in the review process. There is potential for bias in the conduct of a review (e.g. because of inappropriate methods for identifying and selecting evidence for inclusion in the review); bias because the material available for the review is not representative of the evidence base as a whole (due to selective publication); and bias arising from flaws in the design, conduct, analysis and reporting of individual studies included in the review that can cause the effect of an intervention or exposure to be systematically under- or over-estimated. One of the major functions of SRs is to minimise bias in the conduct of a review and prevent, as far as possible, bias from selective publication and methodological flaws in the evidence from giving a misleading impression of what is known in relation to a particular research question.

89 Environmental Protection Agency 2013; Silbergeld, Scherer 2013; Hoffmann, Hartung 2006;
90 Zoeller et al. 2015) the use of SR methods for evaluating the association between health effects
91 and chemical exposures to inform decision-making. There are, however, a number of recognised
92 challenges in extending SR methods to CRA, many of which derive from key differences in the
93 evidence base between the healthcare and toxicological sciences.

94 SRs in medicine often focus on direct evidence for benefits and adverse effects of healthcare
95 interventions derived from randomised controlled trials (RCTs) in humans. The evidence base
96 for CRA is generally more complex, with a need to extrapolate from investigations in animals, *in*
97 *vitro* and *in silico*, and then to synthesise findings with those from human studies if available.
98 Furthermore, the human data tend to come from observational studies with greater and more
99 varied potential for bias and confounding than RCTs. Also, the range of outcomes to be
100 considered is usually much wider than in the assessment of healthcare interventions. Thus,
101 when the various types of toxicological research are combined into a single overall conclusion
102 about the health risks posed by a chemical exposure, reviewers are challenged with integrating
103 the results from a broad and heterogeneous evidence base.

104 In spite of these differences, there is reason for thinking that SR methods can be applied
105 successfully to CRA. For example, techniques for aggregating the results of different study types
106 are already addressed in various frameworks already in use in toxicology. These include:
107 International Agency of Research on Cancer (IARC) monographs (International Agency for
108 Research on Cancer 2006); the Navigation Guide (Woodruff, Sutton 2014); and the US Office for
109 Health Assessment and Translation (OHAT) (Rooney et al. 2014; US National Toxicology Panel
110 2015). Heterogeneous sources of evidence are a familiar challenge in all domains including
111 clinical medicine (Lau et al. 1998), and SR of observational studies has a crucial role in
112 identifying complications and side-effects of healthcare interventions (Sterne et al. 2014;
113 Higgins, Green 2011). The need for SR of pre-clinical animal trials of healthcare interventions, in
114 order to better anticipate benefits and harms to humans, is another area in which methods
115 being developed and utilised by a number of groups including SYRCLE (Hooijmans et al. 2012;
116 van Luijk et al. 2014) and CAMARADES (Macleod et al. 2005; Sena et al. 2014). Stewart and
117 Schmid (2015) argue that research synthesis methods (including systematic review) are generic
118 and applicable to any domain if appropriately contextualised.

119 Given the sometimes controversial outcome of CRAs and the increasingly high public and
120 media profile of the risks that chemicals may pose to humans and the environment, SR is
121 increasingly viewed as a potentially powerful technique in assessing and communicating how
122 likely it is that a chemical will cause harm. SR methods add transparency, rigour and objectivity

123 to the process of collecting the most relevant scientific evidence with which to inform policy
124 discussions and could provide a critical tool for organising and appraising the evidence on
125 which chemical policy decisions are based.

126 Consequently, in November 2014 a group of 35 scientists and researchers from the fields of
127 medicine, toxicology, epidemiology, environmental chemistry, ecology, risk assessment, risk
128 management and SR participated in a one-day workshop to consider the application of SR in
129 CRA. The purpose was three-fold:

- 130 1. Identify from expert practitioners in risk assessment and SR the obstacles, in terms of
131 practical challenges and knowledge gaps, to implementing SR methods in CRA.
- 132 2. Develop a “roadmap” for overcoming those obstacles and expediting the
133 implementation of SR methods, where appropriate, by the various stakeholders
134 involved in CRA.
- 135 3. Establish the foundations of a network to co-ordinate research and activities relating
136 to the implementation of SR methods. The aim would be to promote the wider
137 adoption of SR in CRA, both in Europe and elsewhere, and to support best practice in
138 the application of SR techniques.

139 Participants heard seven presentations about recent developments in SR methods, their
140 application to the risk assessment process, and their potential value to policy-makers. There
141 were two break-out sessions in which participants were divided into three facilitated groups,
142 firstly to discuss challenges to implementing SR methods in CRA, and then to suggest ways in
143 which the obstacles could be overcome. These ideas were discussed in plenary before being
144 summarised, circulated for comment, and then published in this paper. The workshop was
145 conducted under the “Chatham House Rule” such that participants were free to refer to the
146 information presented and discussed, provided they did not attribute it to identifiable
147 individuals or organisations.

148 The purpose of this overview paper is to present the rationale for exploring the application
149 of SR methods to CRA, the various experts’ views on the challenges to implementing SR methods
150 in CRA, and their suggestions for overcoming them. The remaining goals of the meeting are
151 ongoing work, including the development of the roadmap concept for publication and the
152 establishment of a network for supporting the use of SR in CRA.

2. The appeal of SR methods in CRA

Chemical risk assessment is a multi-step process leading to a quantitative characterisation of risk, which can then be used to inform the management of chemical substances so as to ensure that any risks to human health or the environment are managed optimally. CRAs entail four fundamental steps: hazard identification; hazard characterisation (often a dose-response assessment); exposure assessment; and risk characterisation (see Figure 1). These steps draw on various fields of scientific research including chemistry, exposure sciences, toxicology (encompassing *in vivo*, *in vitro*, ecotoxicological and *in silico* methods), ecotoxicology, human epidemiology, and mathematical modelling.

There are many ways in which errors can occur in the interpretation of evidence from these varied disciplines, including failure to consider all relevant data, failure to allow appropriately for the strengths and limitations of individual studies, and over- or underestimating the relevance of experimental models to real-world scenarios (to name a few). Whether the appraisal of evidence is based on objective processes or on subjective expert judgement and opinion may also be an important factor in accurate interpretation of evidence. The assessment process always requires input from technical experts, which inevitably brings an element of subjectivity to the interpretation of the scientific evidence. Different experts may have varying degrees of practical and cognitive access to relevant information, place differing weight on individual studies and/or strands of evidence that they review, and when working in committee, may be more or less influenced by dominant personalities. This can result in misleading conclusions in which the potential for health risks is overlooked, underestimated or overstated. Furthermore, if the factors determining their assessment of evidence are undocumented, when expert opinions are in conflict it can be very challenging to distinguish which opinion is likely to represent the most valid synthesis of the totality of available evidence.

A recent illustrative example (see Figure 2) of when expert scientists and reputable organisations have come to apparently contradictory conclusions about the likelihood of a chemical causing harm is the case of bisphenol-A (BPA). BPA is a monomer used in the manufacture of the resinous linings of tin cans and other food contact materials such as polycarbonate drinks bottles. It has been banned from use in infant-feed bottles across the EU (European Commission 1/28/2011) because of “uncertainties concerning the effect of the exposure of infants to Bisphenol A” (European Commission 5/31/2011).

The European Food Safety Authority (EFSA) considers current exposure levels to BPA to present a low risk of harm to the public (European Food Safety Authority 2015a). The French food regulator ANSES takes a seemingly different stance on the risks to health posed by BPA

187 (French Agency for Food, Environmental and Occupational Health & Safety 4/7/2014),
188 determining there to be a “potential risk to the unborn children of exposed pregnant women”.
189 ANSES has on this basis proposed classifying BPA as toxic to reproduction in humans (French
190 Agency for Food, Environmental and Occupational Health & Safety 2013), a proposal which has
191 contributed to the French authorities’ decision to implement an outright ban on BPA in all food
192 packaging materials (France 12/24/2012). While the ban has been challenged by some
193 stakeholders as being disproportionate under EU law (Tošenovský 2014, 2015; Plastics Europe
194 1/15/2015), the Danish National Food Institute has argued that EFSA has overestimated the
195 safe daily exposure to BPA and that some populations are exposed to BPA at levels higher than
196 can be considered safe (National Food Institute, Denmark 2015); a view reflected in the
197 conclusions of some researchers, e.g. Vandenberg et al. (2014) but not others, e.g. US Food and
198 Drug Administration (2014).

199 The example of BPA shows that while all these bodies ostensibly have access to the same
200 evidence base regarding the potential toxicity of BPA, there is a lack of consensus on how best to
201 interpret it, either in terms of what is known and what is uncertain about the risks to health
202 posed by BPA, and/or what response is appropriate to managing those risks and uncertainties.
203 It also shows how, in the absence of that consensus, there is a danger that policy on BPA may
204 become disconnected from the evidence base, either risking harm to health through continued
205 exposure to BPA or incurring unnecessary economic costs through restricting the use of a
206 chemical which is in fact sufficiently safe. It also suggests that if the reasons for disagreement
207 about health risks posed by a chemical are not accessible to various stakeholders in the debate,
208 then it becomes much more difficult for regulators to credibly resolve controversies about
209 chemical safety, potentially undermining their authority in the long term.

210 This example highlights the potential for differences in the interpretation of evidence when
211 assessing chemical toxicity and the need for a process that is not only scientifically robust but
212 also transparent, so the reasons for any disagreement can be easily recognised – including
213 giving stakeholders greater opportunity to understand when differences in policy stem from
214 divergent assessments of risk, and when they stem from divergent opinions as to how those
215 risks are best managed. It also suggests the importance of the following characteristics in risk
216 assessments that are used to inform risk management decisions:

- 217 1. *Transparency*, in that the basis for the conclusions of the risk assessment should be clear
218 (otherwise they may not be trusted and errors may go undetected).
- 219 2. *Validity*, in that CRAs should be sufficiently (though not necessarily maximally)
220 scientifically robust in their methodology and accurate in their estimation of risks and

221 characterisation of attendant uncertainties as to optimise the decisions that must be
222 made in risk management.

- 223 3. *Confidence*, providing the user with a clear statement as to the overall strength of
224 evidence for the conclusions reached and a characterisation of the utility of the evidence
225 for decision-making (e.g. “appropriate for hazard identification but inappropriate for
226 identification of a reference dose”).
- 227 4. *Utility*, in that the output of the risk assessment should be in a form that is convenient
228 and intelligible to those who will use it (outputs that are too detailed and complex may
229 be inaccessible, leading to inefficiency and possibly erroneous decisions).
- 230 5. *Efficiency*, providing a clear justification of the choice of research question in the context
231 of efficiently solving a CRA problem. Resources for CRA are limited and it is wasteful to
232 expend unnecessary effort on aspects of an assessment that will not be critical to
233 decision-making (although for the purposes of transparency and validity, the reasons for
234 focusing on a particular outcome or otherwise restricting the evaluation should be
235 explained).
- 236 6. *Reproducibility*, in that the conclusions of the SR process when applied to the same
237 question and data should ideally produce the same answer even when undertaken by
238 different individuals (also described as “consistency”). In practice, different experts may
239 reach different conclusions because they will not all make the same value judgments
240 about scope, quality and interpretation of evidence. Therefore, the process should be
241 sufficiently rigorous such that it is highly likely that scientific judgment would result in
242 the same conclusion independent of the experts involved, and as a minimum the SR
243 process should render transparent any reasons for all conclusions.

244 It may be perceived that the value of SR methods lies in their provision of unequivocal
245 assessments of whether or not a chemical will induce specific harm to humans and/or wildlife
246 in given circumstances. In practice, however, this will happen only if the evidence base is
247 sufficiently extensive and there is also unanimity in identification of the problem, the quality of
248 the evidence base, and how it is to be interpreted in answering the review question (without
249 this, SRs will also produce different results). Often, the consensus and/or information may be
250 relatively limited; in such circumstances, a SR will instead clearly state the limitations of the
251 available data and consequent uncertainties. The value here is in the provision of a
252 comprehensive and transparent assessment of what is *not* known and insight into the drivers of
253 divergent opinion. From a research perspective, this yields valuable information about how

254 research limitations and knowledge gaps contribute to ongoing uncertainty about
255 environmental and health risks, allowing the subsequent efforts of researchers to be more
256 clearly focused. From a policy perspective, SRs offer a transparent explanation as to why there
257 are differences in opinion which can then be communicated to stakeholders.

258 Overall, SR contributes to achieving consensus not by eliminating expert judgement, nor by
259 eliminating conflicting opinions about whether a compound should be banned, but by providing
260 a robust, systematic and transparent framework for reviewing evidence of health risks, such
261 that when there is disagreement, the reasons for it are clearly visible and the relative merits of
262 differing opinions can be appraised. In this way, it may help to resolve controversies in the
263 interpretation of the science which informs the risk management process.

264 **3. SR and its application to CRA**

265 *3.1. Traditional vs. SR methods*

266 SR methods are often contrasted with “traditional”, non-systematic narrative approaches to
267 describing what is and is not already known in relation to a research question. In reality, the
268 distinction between systematic and narrative review is a crude one, with narrative reviews
269 encompassing a number of different approaches to reviewing evidence, from the caricature of
270 one researcher writing about “my field, from my standpoint [...] using only my data and my
271 ideas, and citing only my publications” (Caveman 2000), to thorough narrative critiques of
272 comprehensively identified evidence relevant to answering an explicitly articulated question, as
273 conducted by organisations such as IARC.

274 Nonetheless, it is worth noting that only relatively recently has it been recognised that
275 traditional narrative reviews are, to varying degrees, vulnerable to a range of methodological
276 shortcomings which are likely to bias their summarisation of the evidence base (Chalmers et al.
277 2002). These include selective rather than comprehensive retrieval of evidence relevant to the
278 review topic, inconsistent treatment of differences in the methodological quality of included
279 studies, and even an absence of clear review objectives or conclusions which are drawn directly
280 from the strengths and limitations of the evidence base (Mulrow 1987).

281 The presence of these shortcomings seriously challenges the reader’s ability to determine the
282 credibility of a review. When there exist multiple competing reviews, each using opaque
283 methods, it becomes almost impossible to judge their relative merits and therefore to base
284 decisions on current best available evidence. The consequence is a proliferation of conflicting

285 opinions about best practice that fail to take proper account of the body of research evidence. In
286 the healthcare sciences, this was initially shown by Antman and colleagues when they found
287 that, in comparison to recommendations of clinical experts, systematic aggregation of data from
288 existing clinical trials of streptokinase to treat myocardial infarction would have demonstrated
289 benefit some years before recommendations for its use became commonplace (Antman et al.
290 1992). More recently, cumulative meta-analyses have been shown to be more accurate in
291 estimating current understanding of the size of effect of a wide range of healthcare
292 interventions than researchers planning new clinical trials who have not used these methods
293 (Clarke et al. 2014).

294 A SR is an approach to reviewing evidence which specifically sets out to avoid these
295 problems, by methodically attempting “to collate all empirical evidence that fits pre-specified
296 eligibility criteria in order to answer a specific research question,” using “explicit, systematic
297 methods that are selected with a view to minimizing bias” (Higgins & Green, 2011).

298 In detail, this amounts to the pre-specification, in a written protocol, of the objective and
299 methods of the SR, in which the aim of conducting the review is clearly stated as a structured
300 question (for a SR of the effects of an intervention or exposure, this can establish a testable
301 hypothesis or quantitative parameter that is to be estimated), along with the articulation of
302 appropriate methods. The methods specified should include the methods for identifying
303 literature of potential relevance to the research question, the criteria for inclusion of the studies
304 of actual relevance to the research question, how the internal validity² of the included studies
305 will be appraised, and the analytical techniques used for combining the results of the included
306 studies. The purposes of the protocol are to discourage potential biases from being introduced
307 via adjustments being made to the review methodology in the course of its conduct, to allow any
308 justifiable changes to be tracked, and also to allow the protocol to be peer-reviewed in order to
309 help ensure utility and validity of the proposed objective and approach.

310 The final SR itself consists of a statement of the objective, the search method, the criteria for
311 including relevant studies for analysis, and the results of the appraisal of internal validity of the
312 included studies, e.g. implemented as a “risk of bias” assessment in Cochrane Reviews of
313 randomised trials (Higgins et al. 2011). The evidence is then synthesised using statistical meta-

² “Internal validity” is a term used in Cochrane Collaboration guidance on conduct of SRs specifically intended to supersede the use of terms such as “methodological quality” or their equivalents, which are considered ambiguous (Higgins, Green 2011). The internal validity of a piece of research is appraised in a “risk of bias” assessment. The target of the risk of bias assessment is the likelihood, magnitude and direction of systematic error in estimated size of effect of an intervention, as caused by flaws in the design, conduct, analysis and reporting of a study. Throughout this document, we follow Cochrane Collaboration conventions in using “internal validity” as a technical term in place of “methodological quality”.

314 analytical techniques, narrative methods or both (depending on the extent to which meta-
315 analysis is possible) into an overall answer to the research question. An assessment is then
316 made of the strength of the evidence supporting the answer; in Cochrane reviews, this typically
317 follows the GRADE methodology (Atkins et al. 2004), taking into account overall features of the
318 evidence base including risk of bias across the included studies, publication bias in the evidence
319 base, external validity or directness of the evidence to the population of interest, heterogeneity
320 of the evidence, and the overall precision of the evidence. This is finally followed by a
321 concluding interpretation of what the SR as a whole determines is and is not known in relation
322 to its objective.

323 In this, we draw a distinction between a SR and a meta-analysis, whereby a meta-analysis
324 pools the results of a number of studies and may be a component of a SR but does not
325 incorporate the full set of methodological features which define the SR process (e.g. a meta-
326 analysis may or may not include an assessment of the internal validity of included studies).
327 While we acknowledge that some researchers use the terms “systematic review” and “meta-
328 analysis” interchangeably, we believe the two approaches should be disambiguated. It is also
329 worth noting that many reviews employ a combination of narrative and systematic methods;
330 there were differing opinions among workshop participants as to the extent to which it is
331 reasonable to expect all reviews to fully incorporate SR methods.

332 *3.2. The current status of SR in environmental health, toxicology and CRA*

333 While the use of SR methodologies is well established in healthcare to determine the effect of
334 interventions on health outcomes or the accuracy of a diagnostic test, application of SR is
335 relatively new in the fields of toxicology and environmental health. Workshop participants
336 heard how methods for systematic review of medical interventions have in the United States
337 been adapted in both academic and federal contexts to the gathering and appraising of evidence
338 for the effects of chemical exposures on human health: researchers at the University of
339 California have developed the *Navigation Guide* (Woodruff, Sutton 2014), and the US Office of
340 Health Assessment and Translation (OHAT) at the US National Toxicology Program has
341 developed the OHAT Framework for systematically reviewing environmental health research
342 for hazard identification (Rooney et al. 2014).

343 The two approaches adapt the key elements of SR methods to questions in environmental
344 health (which is directly relevant to the CRA process but does not include assessment of dose-
345 response). Features the two approaches have in common include: conducting a SR according to
346 a pre-specified protocol; the development of a specific research question and use of “PECO”
347 statements in systematising review objectives and the methods that will be used to answer that

348 question; an approach to appraising the internal validity of included studies adapted from the
349 risk of bias appraisal tool developed by the Cochrane Collaboration (Higgins et al. 2011); an
350 adaptation of the GRADE methodology (Atkins et al. 2004) for describing the certainty or
351 strength of a body of evidence, incorporating risk of bias elements with other criteria such as for
352 the assessment of relevance or external validity; and a methodology for combining the results of
353 human and animal research into a statement of confidence about the hazard which a chemical
354 poses to health.

355 “PECO” is an acronym representing: Population (the exposure group of interest, e.g. people of
356 a certain age or rats in laboratory studies); Exposure (the compounds or exposure scenarios of
357 interest, e.g. respiratory exposure to fine particulate matter); Comparator (the group to which
358 the exposure group is being compared, e.g. vehicle-exposed controls in laboratory experiments
359 or less exposed groups in epidemiological studies); Outcome (a deleterious change or marker
360 thereof hypothesised to be brought about by the exposure). The purpose of a PECO statement is
361 to provide a framework for developing the key question which a SR will answer, and also to
362 determine the rationale for the inclusion and exclusion criteria that explicitly define which
363 studies are relevant for the review.

364 Other tools are being developed to contribute to the systematic assessment of *in vivo* and
365 ecotoxicity studies which have not been directly derived from Cochrane Collaboration methods.
366 Presented at the workshop was SciRAP (Science in Risk Assessment and Policy), a system
367 developed to improve the consistency with which the relevance and reliability of studies are
368 appraised in the context of conducting a chemical risk assessment for regulatory purposes. It is
369 also intended to reduce the risk of selection bias in the risk assessment process by providing a
370 mechanism for including non-standardised study methods yielding potentially valuable data
371 (Beronius et al. 2014; SciRAP 2014).

372 There are a number of other initiatives promoting and developing the use of SR
373 methodologies in environmental and chemical risk assessment. Participants heard about how
374 the European Food Safety Authority is integrating SR methods into its assessments of food and
375 feed safety (see e.g. European Food Safety Authority 2015b, 2015c), and about the UK Joint
376 Water Evidence Group methods for rapid and systematic assessments of evidence (see e.g.
377 Collins et al. 2014). Other coordinated initiatives include the Evidence-Based Toxicology
378 Collaboration (Hoffmann & Hartung 2006); the Collaboration for Environmental Evidence
379 (Bilotta et al. 2014a; Land et al. 2015); and the Systematic Review Centre for Laboratory Animal
380 Experimentation (SYRCLE).

3.3. Overcoming the challenges in implementing SR methods in CRA

Risk assessment for a chemical or group of chemicals is a multi-faceted process that normally requires consideration of multiple endpoints in relation to a variety of exposure scenarios, integrating evidence from epidemiological studies, bioassays in animals, mechanistic studies and studies on the distribution and determinants of exposure by different pathways and routes. In addition to resolving methodological issues relating to underdeveloped methods (e.g. how SR methods can be used as part of dose-response assessment or how they can be applied to exposure assessment), it is important to consider how SR should fit into the CRA process. The principal challenge going forward is to explore the circumstances in which it would be worth applying more rigorous methods to assess scientific evidence than have been used to date, and to evaluate the practicality and cost-effectiveness of applying such methods in those situations.

In principle, SRs could be conducted on any aspect of a CRA. Given the success in employing SR methods to support evidence-based practice in healthcare, it is intuitive that SRs be applied to address specific questions arising within toxicology, human epidemiology and environmental health (e.g. hazard assessment within a CRA) and this view appears to be gaining momentum within the environmental health literature. The SR method may also lend itself to answering questions concerning e.g. the accuracy of the reported physical-chemical properties of a substance, doses predicted by quantitative exposure assessment, concentrations of a chemical in the environment and biota, and the derivation of a No Observed Adverse Effect Level (NOAEL) or Benchmark Dose Lower 95% confidence limit (BMDL).

Depending on scope, the resources (time and cost) to undertake an SR can be considerable. Currently there is a lack of empirical evidence relating to the resource-effectiveness of SR approaches in CRA and there was a difference of opinion among workshop participants as to whether the effort required for conducting a SR tends to be under- or overestimated. It was suggested that, where effort is likely to be substantial, efficient use of resources may be achieved by focusing on high-value questions developed through initial scoping exercises. For example, a low-dose adverse effect may be evident in animal models and supported to some extent by human epidemiology and hence a question may be formulated around this initial evidence; there may be little point, however, in pursuing a question related to non-carcinogenic toxicity in wildlife if a substantial part of the literature points towards that substance being a potential human carcinogen. There is also growing interest in rapid reviews, when full SR methods are considered overly onerous (Collins et al. 2014; Schünemann, Moja 2015).

The priorities for expediting the adaptation of SR methods to CRA identified at the workshop are as follows:

- 415 1. The development of a number of prototype CRA-focused SRs to explore how readily SR
416 procedures can be integrated into the CRA process, to:
- 417 a. identify additional methodological challenges in adapting SR methods to the CRA
418 context and develop techniques to address them;
- 419 b. acquire practical experience in managing resources when conducting SRs in
420 CRA, including the conduct of scoping exercises for identifying high-value review
421 questions, and the further development and/or application of novel “rapid
422 evidence review” methods (UK Civil Service 2015).
- 423 2. Technical development of SR methodologies for CRA purposes, in particular the further
424 advancement of techniques for incorporating both animal toxicology and human
425 epidemiological studies into the SR and CRA process, to include:
- 426 a. refining tools for more consistent and scientifically robust appraisal of the
427 internal validity of individual studies included in a CRA and the implications for
428 interpretation of their findings; see e.g. Bilotta et al. (2014b). This might include
429 further development and validation of tools such as the SYRCLE methodology for
430 assessing the internal validity of animal studies (Hooijmans et al. 2014), for SR of
431 observational studies, see e.g. Sterne et al. (2014), the methods employed in the
432 NTP/OHAT and Navigation Guide protocols, and the applicability of other
433 assessment methods such as SciRAP (Beronius et al. 2014);
- 434 b. the further development of software akin to the Cochrane Collaboration’s
435 Review Manager (Nordic Cochrane Centre 2014) and the Systematic Review
436 Data Repository (Ip et al. 2012), and tools such as DRAGON (ICF International
437 2015) and the Health Assessment Workspace Collaborative (Rusyn, Shapiro
438 2013) to support extraction, analysis and sharing of data from studies included
439 in reviews.
- 440 3. The development an empirical evidence base for the different types of bias that operate
441 in the CRA domain, including their direction and potential magnitude, and the extent to
442 which any methods being adopted to address them are appropriate and effective.
- 443 4. The development of a recognised “gold standard” for SRs in toxicology and risk
444 assessment equivalent to the Cochrane Collaboration in evidence-based medicine, to
445 address the growing number of purported SRs of unclear methodological robustness
446 which are increasingly prevalent in the environmental health literature.

- 447 5. The creation of a climate of constructive discussion that fosters advancement of
448 methods whereby chemical risk practitioners, industry, competent authorities, academic
449 researchers and policy makers can research, discuss and evaluate SR methods and the
450 potential advantages they can bring.
- 451 6. The establishment of a network of scientists and CRA practitioners to pursue research
452 into and discussion of SR methodologies and facilitate their implementation.
- 453 7. The implementation of training programmes for risk assessment practitioners and
454 stakeholders, focusing specifically on application of SR methods to CRA rather than
455 current courses which focus largely on SR methods in healthcare.

456 **4. Conclusions**

457 While SR methods have proved highly influential in healthcare, they have yet to make
458 significant impact on the CRA process. There are a number of challenges to implementing SR
459 methods in CRA, with particular concerns about approaches to assessing bias and confounding
460 in observational studies, the effort involved in conducting SRs and the subsequent benefits of
461 conforming to SR standards. There is also much promise in the concept of adapting SR methods
462 to CRA via its potential either to give definitive answers to specified research questions, or to
463 enable identification of the reasons for failure to resolve debate. Recent experience from both
464 regulatory agencies and academics already yields some clear recommendations which would
465 expedite the implementation of SR methods in CRA, with the potential to increase the efficiency,
466 transparency and scientific robustness of the CRA process.

467 **5. Acknowledgements**

468 Funding for the workshop was provided through the Economic & Social Science Research
469 Council grant “Radical Futures in Social Sciences” (Lancaster University) and Lancaster
470 Environment Centre. CH, PW, AR are grateful to Lancaster University’s Faculty of Science &
471 Technology “Distinguished Visitors” funding programme. The Royal Society of Chemistry is
472 acknowledged for generously providing a meeting room, refreshments and facilitating the
473 workshop proceedings. The PhD studentship of PW is partly funded through Lancaster
474 Environment Centre. The contribution of non-author workshop participants to the development
475 of the manuscript is also greatly appreciated.

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669 **Figure 2:** Diagram showing the CRA process, whereby risk is a function of hazard and
670 exposure. While SR methods could in principle be applied to all steps of the CRA process, it
671 is the view of the workshop participants that up to this point in time most attention has been
672 focused on the hazard identification and hazard characterisation steps. There are issues
673 around conducting a systematic review for exposure assessment which were not discussed at
674 the workshop, such as the requirement for a very different tool for assessing risk of bias in
675 exposure studies which may necessitate very specialised knowledge of analytical chemistry.

676 **Figure 3:** The potential utility of SR methods in application to REACH registrations

677 **Figure 4:** Examples of conflicting opinions from scientists and government agencies about
678 the risks to health posed by bisphenol-A at current exposure levels.

679