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2 **Expert appraisal on recommending occupational exposure**
3 **limits for chemical agents**

4 **Assessment of health effects for**
5 **titanium dioxide under nanoform (nTiO₂)**
6 **CAS N° 13463-67-7**
7

8 **Expertise en vue de la fixation de valeurs limites**
9 **d'exposition à des agents chimiques en milieu**
10 **professionnel**

11 **Evaluation des effets sur la santé**
12 **Dioxyde de titane sous forme nanométrique (nTiO₂)**
13 **CAS N° 13463-67-7**

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15 **OEL Permanent Mission/Mission permanente VLEP**
16 **Request n°/Saisine n°2019-SA-0109**
17

18 **Collective expert appraisal**
19 **RAPPORT d'expertise collective**

20
21 **Expert Committee on « health reference values »**
22 **Comité d'experts spécialisé « Valeurs Sanitaires de Référence »**
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24 **November 2019/Novembre 2019**

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43 **Mots clés**

44 VLEP, valeurs limites, niveaux d'exposition, milieu professionnel, agents chimiques, effets sur la
45 santé, lieux de travail, valeur de référence, dioxyde de titane, TiO₂, nanométrique, nanoparticule,
46 nanomatériau.

47

48 **Key words**

49 OEL, limit values, exposure levels, occupational, chemical agents, health effects, workplaces,
50 reference value, titanium dioxide, TiO₂, nanometric, nanoparticle, nanomaterial.

51

52 Presentation of participants

53 **Preamble** : The expert members of the Expert Committees and Working Groups or designated
54 rapporteurs are all appointed in a personal capacity, *intuitu personae*, and do not represent their
55 parent organisations.

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Document for consultation/Document pour consultation

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Expertise collective : synthèse de l'argumentaire et conclusions

relatives à l'expertise en vue de la fixation de valeurs limites d'exposition à des agents chimiques en milieu professionnel

portant sur l'évaluation des effets sur la santé sur le lieu de travail pour le dioxyde de titane sous forme nanométrique (CAS n°13463-67-7)

Ce document synthétise les travaux du comité d'experts spécialisé « Valeurs Sanitaires de Référence » (CES VSR)

Présentation de la question posée

En 2015, l'Anses a porté auprès de l'Agence européenne des produits chimiques (ECHA) une proposition de classification de la cancérogénicité par inhalation du TiO₂ (cancérogène de catégorie 1B) dans le cadre du règlement européen (CLP) n° 1272/2008 relatif à la classification, l'étiquetage et l'emballage des substances et des mélanges dangereux. En 2017, le comité d'évaluation des risques (RAC) de l'ECHA a conclu que le TiO₂ sous toutes ses formes devrait être classé comme cancérogène suspecté pour l'Homme (catégorie 2) par inhalation.

L'Anses a ainsi été saisie par la DGS, la DGPR et la DGT le 4 juillet 2017 pour définir une VTR chronique par inhalation pour le dioxyde de titane sous forme nanométrique. Cette demande résulte selon les termes de la saisine de « l'analyse de la base de données R-Nano indiquant que de nombreux sites industriels en France utilisent du dioxyde de titane sous forme nanométrique. Ces manipulations peuvent être à l'origine d'exposition des travailleurs mais également d'exposition des populations via des émissions à l'extérieur des sites ». La saisine relève que « le Centre international de recherche sur le cancer (CIRC) a classé le dioxyde de titane sous forme de particules respirables en cancérogène possible par inhalation ».

Un avis a été publié par l'Anses en avril 2019 définissant une VTR de 0,12 µg/m³ applicable uniquement à la forme P25¹ du TiO₂. Le niveau de confiance de cette VTR a été qualifié de « modéré ». Suite à cet avis, et conformément au protocole d'accord relatif aux valeurs limites d'exposition professionnelle et valeurs limites biologiques (VLEP et VLB) établi entre le ministère du travail et l'Anses, l'Anses a lancé les travaux pour l'élaboration de VLEP.

Par ailleurs, dans le cadre du règlement REACH, l'Anses instruit actuellement un dossier d'évaluation des dangers et des risques du TiO₂ pour la santé humaine et pour l'environnement. Dans le cadre de l'instruction de ce dossier, des données supplémentaires sur les dangers, les usages du TiO₂ pourront être requises par l'Anses auprès des industriels.

¹ P25 : Anatase (80%) and rutile (20%); Taille de particules primaires : 21 nm; Aire de surface spécifique : 48.08 m²/g

226 Contexte scientifique

227 Le dispositif français d'établissement des VLEP comporte trois phases clairement distinctes :

- 228 - une phase d'expertise scientifique indépendante (seule phase confiée à l'agence) ;
- 229 - une phase d'établissement d'un projet réglementaire de valeur limite contraignante ou
230 indicative par le ministère chargé du travail ;
- 231 - une phase de concertation sociale lors de la présentation du projet réglementaire au sein du
232 Conseil d'Orientation sur les Conditions de Travail (COCT). L'objectif de cette phase étant
233 de discuter de l'effectivité des valeurs limites et de déterminer d'éventuels délais
234 d'application, en fonction de problèmes de faisabilité technico-économique.

235 L'organisation de la phase d'expertise scientifique nécessaire à la fixation des valeurs limites
236 d'exposition professionnelle (VLEP) a été confiée à l'Afsset dans le cadre du plan santé au travail
237 2005-2009 (PST), puis à l'Anses suite à la fusion de l'Afsset et de l'Afssa en 2010.

238 Les VLEP telles que recommandées par le CES « expertise en vue de la fixation de valeurs limites
239 à des agents chimiques en milieu professionnel », sont des niveaux de concentration en polluants
240 dans l'atmosphère des lieux de travail à ne pas dépasser sur une période de référence déterminée
241 et en deçà desquels le risque d'altération de la santé est négligeable. Même si des modifications
242 physiologiques réversibles sont parfois tolérées, aucune atteinte organique ou fonctionnelle de
243 caractère irréversible ou prolongée n'est admise à ce niveau d'exposition pour la grande majorité
244 des travailleurs. Ces niveaux de concentration sont déterminés en considérant que la population
245 exposée (les travailleurs) est une population qui ne comprend ni enfants ni personnes âgées.

246 Ces niveaux de concentrations sont déterminés par les experts du CES à partir des informations
247 disponibles dans des études épidémiologiques, cliniques, de toxicologie animale, etc. L'identification
248 de ces concentrations sécuritaires pour la santé humaine nécessitent généralement d'appliquer des
249 facteurs d'ajustement aux valeurs identifiées directement par les études. Ces facteurs permettent
250 de prendre en compte un certain nombre d'éléments d'incertitude inhérents à la démarche
251 d'extrapolation conduite dans le cadre d'une évaluation des effets sanitaires des substances
252 chimiques sur l'Homme.

253 Trois types de valeurs sont recommandées par le CES :

- 254 - valeur limite d'exposition 8 heures : il s'agit de la limite de la moyenne pondérée en fonction
255 du temps de la concentration atmosphérique d'un agent chimique dans la zone de respiration
256 d'un travailleur au cours d'un poste de 8 heures. Dans l'état actuel des connaissances
257 scientifiques (en toxicologie, médecine, épidémiologie, etc.), la VLEP-8h est censée
258 protégée d'effets sur la santé à moyen et long termes, les travailleurs exposés régulièrement
259 et pendant la durée d'une vie de travail à l'agent chimique considéré ;
- 260 - valeur limite d'exposition à court terme (VLCT) : il s'agit de la limite de la moyenne pondérée
261 en fonction du temps de la concentration atmosphérique d'un agent chimique dans la zone
262 de respiration d'un travailleurs sur une période de référence de 15 minutes pendant le pic
263 d'exposition quelle que soit sa durée. Elle vise à protéger les travailleurs des effets néfastes
264 sur la santé (effets toxiques immédiats ou à court terme, tels que des phénomènes
265 d'irritation), dus à des pics d'exposition ;
- 266 - valeur plafond : il s'agit de la limite de la concentration atmosphérique d'un agent chimique
267 dans la zone de respiration d'un travailleur, qui ne doit être dépassée à aucun moment de la
268 période de travail. Cette valeur est appliquée aux substances reconnues comme irritant fort
269 ou corrosif ou pouvant causer un effet grave potentiellement irréversible, à très court terme.

270 Ces trois types de valeurs sont exprimés :

- 271 - soit en mg.m⁻³, c'est-à-dire en milligrammes d'agent chimique par mètre cube d'air et en ppm
272 (parties par million), c'est-à-dire en centimètres cube d'agent chimique par mètre cube d'air,
273 pour les gaz et les vapeurs ;
- 274 - soit en mg.m⁻³ uniquement, pour les aérosols liquides et solides ;
- 275 - soit en f.cm⁻³, c'est-à-dire en fibres par cm³ pour les matériaux fibreux.

276 La valeur de la VLEP-8h peut être dépassée sur de courtes périodes pendant la journée de travail
277 à condition toutefois :

- 278 - que la moyenne pondérée des valeurs sur l'ensemble de la journée de travail ne soit pas
279 dépassée ;
- 280 - de ne pas dépasser la valeur de la VLCT si elle existe.

281 En plus des VLEP, le CES évalue la nécessité d'attribuer ou non une mention « peau », lorsqu'une
282 pénétration cutanée significative a été identifiée (Anses, 2017). Cette mention indique la nécessité
283 de prendre en compte la voie d'exposition cutanée dans l'évaluation de l'exposition et, le cas
284 échéant, de mettre en œuvre des mesures de prévention appropriées (telles que le port de gants de
285 protection). En effet, la pénétration cutanée des substances n'est pas prise en compte pour la
286 détermination des niveaux de valeurs limites atmosphériques et peut donc potentiellement entraîner
287 des effets sanitaires indépendamment du respect de ces dernières.

288 Le CES évalue également la nécessité d'attribuer ou non une mention « bruit » signalant un risque
289 d'atteinte auditive en cas de co-exposition au bruit et à la substance en dessous des limites
290 d'exposition recommandées afin que les préventeurs mettent en place des mesures appropriées
291 (collective, individuelle et médicale).

292 Le CES évalue également les méthodes de référence applicables pour la mesure des niveaux
293 d'exposition sur le lieu de travail. La qualité de ces méthodes et leur applicabilité à la mesure des
294 expositions aux fins de comparaison à une VLEP ont été évaluées notamment sur leur conformité
295 aux exigences de performance de la NF-EN 482 et de leur niveau de validation.

296

297 **Organisation de l'expertise**

298 L'Anses a confié au comité d'experts spécialisé (CES) « Valeurs Sanitaires de Référence » (CES
299 « VSR ») l'instruction de cette saisine.

300 Les travaux d'expertise ont été soumis régulièrement au CES tant sur les aspects méthodologiques
301 que scientifiques.

302 Le rapport produit tient compte des observations et éléments complémentaires transmis par les
303 membres du CES.

304 Ces travaux d'expertise sont ainsi issus d'un collectif d'experts aux compétences complémentaires.
305 Ils ont été réalisés dans le respect de la norme NF X 50-110 « qualité en expertise ».

306 Le rapport ainsi que la synthèse et les conclusions de l'expertise collective concernant les effets sur
307 la santé ont été adoptées par le CES « Valeurs Sanitaires de Référence » le 28/11/2019. Trois
308 experts ont exprimé un avis divergent et un s'est abstenu. Leur position est détaillée en français en
309 annexe de cette note d'expertise.

310

311 **Prévention des risques de conflits d'intérêts**

312 L'Anses analyse les liens d'intérêts déclarés par les experts avant leur nomination et tout au long
313 des travaux, afin d'éviter les risques de conflits d'intérêts au regard des points traités dans le cadre
314 de l'expertise.

315 Les déclarations d'intérêts des experts sont rendues publiques *via* le site internet de l'Anses
316 (www.anses.fr).

317

318 Description de la méthode

319 Pour l'évaluation des effets sur la santé :

320 Un profil toxicologique a été élaboré par l'Anses et soumis au CES VSR qui l'a commenté et
321 complété.

322 Le profil toxicologique est issu d'éléments bibliographiques prenant en compte la littérature
323 scientifique parue sur cette substance jusqu'en janvier 2018. La recherche bibliographique a été
324 effectuée dans les deux bases de données : PubMed et Scopus®. La littérature secondaire du CIRC,
325 de l'OCDE, du NIOSH, de l'ECHA, de l'EFSA, du SCCS ainsi que la proposition de classification et
326 d'étiquetage harmonisé de l'Anses (Anses, 2016) ont également été prises en compte.

327

328

329 Résultat de l'expertise collective concernant les effets sur la santé

330

331 Introduction

332 Le TiO₂ existe sous forme micro ou nanométrique. Le présent document concerne exclusivement le
333 TiO₂ sous forme nanométrique (ci-dessous TiO₂-NP).

334 Selon la définition de la Commission européenne, « on entend par « nanomatériau » un matériau
335 naturel, formé accidentellement ou manufacturé contenant des particules libres, sous forme
336 d'agrégat ou sous forme d'agglomérat, dont au moins 50 % des particules, dans la répartition
337 numérique par taille, présentent une ou plusieurs dimensions externes se situant entre 1 nm et 100
338 nm. Dans des cas spécifiques, lorsque cela se justifie pour des raisons tenant à la protection de
339 l'environnement, à la santé publique, à la sécurité ou à la compétitivité, le seuil de 50 % fixé pour la
340 répartition numérique par taille peut être remplacé par un seuil compris entre 1 % et 50 %.²»
341 (recommandation de la CE 2011/696/UE). Cette définition est celle utilisée dans le présent avis pour
342 définir le TiO₂-NP.

343

344 En plus de la taille, d'autres propriétés physico-chimiques intrinsèques au TiO₂ peuvent également
345 varier et sont supposées influencer sa réactivité, dont (NIOSH, 2011 ; IARC, 2010) :

- 346 • la forme : sphérique, allongée, fibreuse etc.
- 347 • la nature de la surface (revêtement, fonctionnalisation) avec recouvrement par des
348 substances inorganiques (silice, alumine...) ou organiques (siloxane, triméthylolpropane...)
- 349 • la cristallinité : 3 polymorphes naturels principaux existent : rutile, anatase et brookite.
350 Cependant, au niveau industriel, seules la rutile et l'anatase sont utilisées.

351

² Le seuil de 50 % précisé dans la définition de la Commission européenne n'a pas été retenu pour exclure les études qui ne mentionnaient pas cette information.

352 Parmi les études identifiées dans la littérature et retenues pour cette expertise, plusieurs ont été
353 réalisées avec du TiO₂ P25. Le P25 est une forme de référence du TiO₂-NP caractérisée de façon
354 complète par l'OCDE (sous le nom de NM105). Il s'agit d'un mélange 80 % / 20 % anatase/rutile
355 avec une taille primaire d'environ 20-25 nm.

356

357 **Données de toxicocinétique**

358 Les études de cinétique relatives à une exposition respiratoire au TiO₂-NP chez le rat se sont
359 majoritairement intéressées à sa distribution et sa biopersistance au niveau pulmonaire. Les
360 particules de TiO₂-NP sont principalement retrouvées dans les macrophages alvéolaires mais aussi,
361 à un niveau moindre, au niveau des pneumocytes (Eydner et al. (2012)). Le temps de demi-vie
362 estimé est approximativement de 2 mois chez le rat (Oyabu et al. (2017)). En absence de surcharge
363 pulmonaire, la distribution pulmonaire ainsi que le temps de demi-vie ne semblent pas influencés
364 par la durée d'exposition (Zhang et al. (2015); Bermudez et al. (2004)).

365 Une translocation³ vers d'autres organes, tels que le foie, le cœur, les reins, le pancréas, la rate ou
366 encore le cerveau a été rapportée par différents auteurs (Kreyling et al. (2017c) ; Pujalte et al.
367 (2017) ; Husain et al. (2015) ; Eydner et al. (2012) ; Gate et al. (2017)), même si celle-ci ne semble
368 pas prédominante. En effet, la vitesse de translocation est plus lente que celle de la clairance
369 pulmonaire (Shinohara et al. (2014)).

370 Le TiO₂-NP est principalement excrété dans les fèces (Pujalte et al. (2017)), ce qui serait
371 majoritairement consécutif à une déglutition des particules lors de la clairance mucociliaire au niveau
372 du tractus respiratoire. En ce sens, cette excrétion n'est pas représentative d'une élimination de
373 TiO₂-NP préalablement absorbé au niveau systémique.

374

375 **Données de toxicité**

376 **Toxicité aiguë**

377 La plupart des études de toxicité aiguë par voie respiratoire disponibles avec le TiO₂-NP se sont
378 focalisées sur l'étude des effets pulmonaires. Les effets rapportés, que ce soit par inhalation ou par
379 instillation intra-trachéale, consistent principalement en une inflammation associée ou non à des
380 modifications histo-pathologiques (inhalation : Grassian et al. (2007a & b); Noel et al. (2012) ;
381 Leppänen et al. (2011); Leppänen et al. (2015); Oyabu et al. (2016) – instillation : Oberdörster et al.
382 (2000), Renwick et al. (2004), Chen et al. (2006), Nemmar et al. (2008), Nemmar et al. (2011), Liang
383 et al. (2009), Sager and Castranova (2009), Cho et al. (2010), Roberts et al. (2011), Tang et al.
384 (2011), Hurbankova et al. (2013), Husain et al. (2013), Husain et al. (2015), Lee et al. (2014), Choi
385 et al. (2014), Yoshiura et al. (2015), Kobayashi et al. (2016), Wallin et al. (2017); Saber et al. (2013) ;
386 Oyabu et al. (2013)).

387

388 Une série d'études réalisée par une même équipe s'est également intéressée aux effets du TiO₂-NP
389 sur le système cardiovasculaire (Nurkiewicz et al. (2008), Nurkiewicz et al. (2009), LeBlanc et al.
390 (2009), LeBlanc et al. (2010), Knuckles et al. (2012), Stapleton et al. (2015b)). Les auteurs ont
391 observé qu'une exposition aiguë par inhalation corps entier au TiO₂ P25 (6 mg/m³ ; 4 heures)
392 entraînait une altération de la vasodilatation. Ils ont conclu que cette altération serait due à un
393 dysfonctionnement endothélial médié par la production de radicaux libres réduisant ainsi la

³ Translocation : déplacement des particules hors du site de dépôt pulmonaire initial (Handbook on the toxicology of metals, 2015).

394 biodisponibilité du monoxyde d'azote. Ces effets semblent apparaître à des concentrations pouvant
395 également induire une inflammation pulmonaire.

396

397 **Toxicité subchronique et chronique**

398 *Données chez l'Homme*

399 Huit études ont analysé les effets du TiO₂ chez les travailleurs. Trois études ont été réalisées en
400 Chine (Zhen et al. (2012); Ichiara et al. (2016) and Zhao et al. (2018)) et cinq en République tchèque
401 (Pelclova et al. (2015, 2016a, b, c et 2017)). Ces études, majoritairement transversales, suggèrent
402 un effet possible du TiO₂-NP sur les fonctions respiratoire et cardiovasculaire. Cependant, aucune
403 de ces études n'a permis de mettre en évidence une relation causale entre une exposition à du TiO₂
404 sous forme micro- ou nanométrique et l'apparition de ces effets. La possibilité de biais de sélection
405 et de classification, notamment sur l'exposition, ainsi que de biais de confusion ne permettent pas
406 de considérer ces études adéquates pour conclure sur la toxicité du TiO₂-NP chez l'Homme.

407

408 *Données chez l'animal*

409 - Effets pulmonaires

410 Comme pour les études de toxicité aiguë, la majorité des études de toxicité répétée par voie
411 respiratoire se sont focalisées sur les effets pulmonaires du TiO₂-NP. Cinq études de toxicité répétée
412 par inhalation utilisant plusieurs concentrations ont été identifiées dans la littérature.

413 Dans une étude de toxicité subchronique (Bermudez et al. (2004)), des femelles de trois
414 espèces (rats, souris et hamsters) ont été exposées nez seul au P25 pendant 90 jours aux
415 concentrations nominales de 0,5 ; 2,0 ou 10 mg/m³. Alors que les hamsters ne présentaient aucun
416 effet pulmonaire, une inflammation pulmonaire a été observée chez les souris à la plus forte
417 concentration testée, ainsi que des effets histopathologiques au niveau du poumon chez les rats
418 dès la concentration de 2,0 mg/m³. Le rat est l'espèce la plus sensible dans cette étude avec
419 l'observation d'effets pré-néoplasiques, tels que des métaplasies, à la plus forte concentration
420 testée. Ainsi, une NOAEC⁴ de 10 mg/m³ peut être dérivée chez le hamster et une NOAEC de 2
421 mg/m³ chez la souris. Chez le rat, une NOAEC de 0,5 mg/m³ peut être dérivée sur la base
422 d'hypertrophies et d'hyperplasies des cellules alvéolaires de type II, de sévérité minimale à la
423 concentration de 2 mg/m³ (LOAEC).

424

425 Après une exposition de 5 jours au TiO₂-NP (86%/14% anatase/rutile ; 25 nm) chez le rat mâle, Ma-
426 Hock et al. (2009) ont mis en évidence des changements histopathologiques pulmonaires incluant
427 une inflammation à toutes les concentrations testées (2, 10, 50 mg/m³) et des hypertrophies /
428 hyperplasies des bronches et bronchioles à la plus forte concentration de 50 mg/m³. Une LOAEC⁵
429 de 2 mg/m³ a été identifiée par les auteurs. Une inflammation pulmonaire, mise en évidence par des
430 modifications de paramètres dans le liquide de lavage broncho-alvéolaire, a été rapportée chez le
431 rat mâle à cette même concentration par Landsiedel et al. (2014) également après une exposition
432 de 5 jours au TiO₂-NP (rutile revêtu en surface par du diméthicone/méthicone). Dans cette dernière
433 étude, la première dose testée, 0,5 mg/m³, a donc été identifiée comme une NOAEC.

⁴ NOAEC = No Observed Adverse Effect Concentration (= Concentration maximale n'entraînant pas d'effet néfaste observé)

⁵ LOAEC = Lowest Observed Adverse Effect Concentration (= Concentration minimale entraînant un effet néfaste observé)

434 Oyabu et al. (2017) ne rapportent pas d'inflammation pulmonaire chez le rat mâle à des
435 concentrations allant jusqu'à 1,84 mg/m³ après une exposition de 4 semaines à du TiO₂-NP (rutile,
436 12x55 nm), mais les paramètres testés sont limités. Cependant, de nombreux effets pulmonaires
437 ont été notés chez la souris à toutes les doses testées (LOAEC = 2,5 mg/m³) par Yu et al. (2015)
438 avec une forme non caractérisée de TiO₂-NP, et ce, pour une même durée d'exposition. Du fait de
439 l'absence de caractérisation du matériel testé, cette dernière étude ne peut être utilisée pour la
440 construction d'une valeur de référence.

441 Malgré des durées d'exposition plus courtes et la diversité des protocoles mis en œuvre (TiO₂-NP
442 différent, espèces différentes...), toutes les études par inhalation décrites ci-dessus sont cohérentes
443 avec celle de Bermudez et al. (2004).

444 D'autres études ont été identifiées dans la littérature, mais elles ont été réalisées par inhalation avec
445 une seule concentration ou par instillation. Elles confirment néanmoins les résultats précédemment
446 décrits, qualitativement ou quantitativement (Grassian et al. (2007b), Eydner et al. (2012), Jackson
447 et al. (2013), Halappanavar et al. (2011) ; Leppänen et al. (2011 & 2015); Sun et al. (2012a, b), Li et
448 al. (2013), Hong et al. (2017)).

449

450 - Effets sur le système cardiovasculaire

451 Cinq études réalisées par inhalation ou par instillation ont analysé les effets du TiO₂-NP sur le
452 système cardiovasculaire après une exposition répétée. Divers effets, incluant des
453 dysfonctionnements micro-vasculaires ou de l'athérosclérose, ont été rapportés chez le rat ou la
454 souris dans quatre de ces études (Stapleton et al. (2013) ; Yu et al. (2014) ; Saber et al. (2013),
455 Chen et al. (2013)). Les concentrations utilisées dans les études par inhalation (10 et 42 mg/m³)
456 sont cependant bien plus élevées que celles des études évaluant les effets pulmonaires (dès 0,5
457 mg/m³), et ne permettent donc pas de comparer quantitativement ces effets avec ceux observés au
458 niveau pulmonaire.

459

460 - Effets sur le système immunitaire

461 De nombreuses études évaluant les effets du TiO₂-NP sur le système immunitaire sont disponibles.
462 Elles utilisent différents protocoles et différentes voies d'exposition (instillation, inhalation).

463 Deux études ont montré une diminution des cellules CD4+ et CD8+ avec un ratio CD4+/CD8+
464 augmenté, indiquant une perturbation du système immunitaire chez le rat (Chang et al. (2015),
465 Gustafsson et al. (2011)). Une augmentation des cellules NK a également été observée suite à une
466 exposition au TiO₂-NP chez le rat (Fu et al. (2014), Gustafsson et al. (2011)). Il semble néanmoins
467 difficile de conclure quant à l'immunotoxicité du TiO₂-NP au regard des protocoles et des résultats
468 hétérogènes.

469

470 - Effets sur le système nerveux central

471 Onze études relatives à la neurotoxicité du TiO₂-NP ont été identifiées dans la littérature.

472 Des altérations histologiques de l'hippocampe et du cortex cérébral ont été observées chez la souris
473 (Zhang et al. (2011), Wang et al. (2008a, b)) suite à une administration intranasale avec différentes
474 formes de TiO₂-NP. Zhang et al. (2011) rapportent une toxicité supérieure du TiO₂-NP rutile revêtu
475 en surface par de la silice en comparaison d'une forme rutile non revêtue en surface. Wang et al.
476 (2008 a & b) ont noté des effets plus sévères après une exposition à de l'anatase par rapport au
477 rutile.

478 Une autre équipe a montré une accumulation du TiO₂-NP (anatase ; 6 nm) dans le cerveau de souris
479 avec une prolifération des cellules gliales, une nécrose et des signes de dégénérescence cellulaire,

480 ainsi que des dérégulations de gènes liés au stress oxydatif, au développement du cerveau, à la
481 mémoire et l'apprentissage.... Ces résultats suggèrent une toxicité dose dépendante du TiO₂-NP sur
482 le cerveau, l'hippocampe étant identifié comme une région cérébrale plus particulièrement sensible
483 (Ze et al. (2013), (2014a, b, c)).

484

485 - Hépatotoxicité

486 Alors qu'une analyse transcriptomique n'a pas rapporté d'effet hépatique du TiO₂-NP après une
487 exposition gestationnelle de 10 jours par inhalation à la concentration de 42 mg/m³ chez la souris
488 (Halappanavar et al. (2011)), des œdèmes des cellules hépatiques ont été observés après une
489 exposition par instillation pendant 4 semaines à du P25 chez le rat (Chang et al. (2015)).

490

491 - Effets sur les reins

492 Une seule étude, réalisée par instillation, portant sur les effets rénaux du TiO₂-NP a été identifiée
493 dans la littérature. Des modifications histopathologiques, incluant une dilatation tubulaire et une
494 nécrose, en présence d'une augmentation du stress oxydatif, ont été rapportées dès la dose de 0,5
495 mg/semaine pendant 4 semaines d'exposition au P25 chez la souris (Huang et al. (2015)).

496

497 **Toxicité sur la reproduction et le développement**

498 Plusieurs équipes ont analysé les effets sur le développement du TiO₂-NP suite à une exposition
499 pré- ou péri-natale par inhalation ou par instillation. Ces travaux n'avaient pas pour but d'étudier la
500 survenue de malformations mais plutôt d'effets mutagènes ou d'effets en lien avec une atteinte
501 pulmonaire, cardiovasculaire ou neurocomportementale.

502 La première équipe (Hougaard et al. (2010), Boisen et al. (2012); Kyjovska et al. (2013), Jackson et
503 al. (2013)) a exposé des souris femelles du 8^{ème} au 18^{ème} jour de gestation à du TiO₂-NP sous forme
504 rutile avec un revêtement de surface organique (UV-Titan L181) à la concentration de 40 mg/m³. A
505 cette concentration, les mères présentaient une inflammation pulmonaire. Chez les petits, les effets
506 rapportés incluaient des changements neurocomportementaux modérés (Hougaard et al. (2010)),
507 ainsi qu'une altération de l'expression génique dans le foie des femelles (Jackson et al. (2013)). Une
508 réduction non statistiquement significative du nombre de spermatozoïdes associée à un allongement
509 du délai d'obtention de la première portée a également été rapportée par Kyjovska et al. (2013). A
510 *contrario*, il n'a pas été observé d'augmentation des mutations, ni d'effet sur la viabilité ou le sexe-
511 ratio des portées (Boisen et al. (2012)).

512 La deuxième équipe (Stapleton et al. (2013, 2015, 2018), Engler-Chiurazzi et al. (2016), Hathaway
513 et al. (2017)) a testé une exposition des femelles gestantes à du P25 pendant environ 8 jours à partir
514 de l'implantation, à la concentration de 10 mg/m³ chez le rat. Lors de l'étude de l'impact de la durée
515 d'exposition (<7j et >7j), Stapleton et al. (2013) ont observé une diminution de la taille et du poids
516 des portées lors d'une exposition de 11 jours durant la période de gestation, contrairement à une
517 durée d'exposition de 7 jours. Ces effets n'ont pas non plus été observés dans les études
518 postérieures avec une durée d'exposition de 7-8 jours. Des altérations microvasculaires et
519 cardiaques ont été observées chez les petits (Stapleton et al. (2013, 2015, 2018), Hathaway et al.
520 (2017)) ainsi que des effets sur les fonctions cognitives et comportementales (Engler-Chiurazzi et
521 al. (2016)).

522 Enfin, deux études par instillation se sont intéressées aux effets sur le développement pulmonaire
523 chez la souris. Ambalavanan et al. (2013) suggèrent une augmentation du risque de survenue de
524 maladies respiratoires après une administration unique d'anatase (6 nm) au 4^{ème}, 7^{ème} ou 10^{ème} jour
525 après la naissance. Une altération pulmonaire a également été notée par Paul et al. (2017), chez

526 des fœtus après une exposition au 2^{ème}, 9^{ème} et 16^{ème} jour de gestation. Cet effet n'était pas associé
527 à une réponse inflammatoire pulmonaire chez les mères ou les fœtus, ni au niveau placentaire.

528 Ainsi, les études décrites ci-dessus suggèrent un effet possible sur le développement après une
529 exposition à du TiO₂-NP. Cependant, ces études, réalisées à une seule concentration, ne permettent
530 pas d'identifier une NOAEC.

531

532 **Génotoxicité**

533 De nombreuses publications ont analysé les propriétés mutagènes du TiO₂-NP, principalement sous
534 la forme anatase ou anatase/rutile.

535 Les études *in vitro* et *in vivo* rapportent des résultats contradictoires, avec des résultats positifs
536 observés principalement à fortes doses dans des tests des comètes et des études de micronoyaux.
537 Cette disparité des résultats pourrait s'expliquer par des différences dans les protocoles et/ou dans
538 les formes de TiO₂-NP testées. Cependant, à ce jour, et malgré la quantité de données disponibles,
539 il n'est pas possible d'identifier un paramètre clé relié aux effets génotoxiques identifiés
540 (Magdolenova et al. (2014); Chen et al. (2014); ANSES (2016); Charles et al. (2018)).

541 D'un point de vue mécanistique, les données suggèrent que les effets génotoxiques seraient liés à
542 un mécanisme secondaire, *via* la production de radicaux libres. (Charles et al. (2018)).

543 En conclusion, sur la base de ces résultats et considérant que les effets cancérigènes apparaissent
544 uniquement à de fortes concentrations induisant une réponse inflammatoire et une altération de la
545 clairance, le TiO₂-NP présente une faible génotoxicité. Ces conclusions sont similaires à celles du
546 CIRC (2010), du NIOSH⁶ (2011), de l'Anses (2016) et de l'OCDE⁷ (2018).

547

548 **Cancérogénicité**

549 *Données chez l'Homme*

550 Sept études épidémiologiques, dont cinq études de cohorte rétrospectives (Chen & Fayerweather
551 (1988); Fryzek et al. (2003) ; Boffetta et al. (2004) ; Ellis et al. (2010 & 2013)) et deux études cas-
552 témoin (Boffetta et al. (2001), Ramanakumar et al. (2008)) ont analysé le lien entre une exposition
553 au TiO₂ et l'apparition de cancers. Le TiO₂ n'étant pas caractérisé dans les publications, il ne peut
554 pas être exclu que les populations analysées soient exposées, au moins en partie, à du TiO₂ sous
555 forme nanoparticulaire.

556 La plupart de ces études rapportent une augmentation (significative ou non) de la mortalité par
557 cancer pulmonaire. Cependant, aucune n'a permis de mettre en évidence une relation causale entre
558 une exposition à du TiO₂ et l'apparition de cet effet. L'identification de biais de sélection, de
559 classification, notamment sur l'exposition ainsi que de biais de confusion, ne permettent pas de
560 considérer ces études adéquates pour conclure à l'absence ou l'existence d'effet cancérigène chez
561 l'Homme.

562 *Données chez l'animal*

563 Les effets cancérigènes du TiO₂ (sous toutes ses formes) ont été analysés par différentes instances
564 nationales ou internationales d'experts, incluant l'Anses en 2015.

⁶ National Institute for Occupational Safety and Health

⁷ Organisation de Coopération et de Développement Economiques

565 Concernant le TiO₂-NP, une seule étude de cancérogénicité par inhalation est disponible (Heinrich
566 et al. (1995)). Dans cette étude, une augmentation de l'incidence de tumeurs pulmonaires bénignes
567 et malignes (tumeurs kystiques des cellules squameuses, carcinomes des cellules squameuses et
568 adénomes/adénocarcinomes bronchioalvéolaires) a été observée chez des rats exposés par
569 inhalation corps entier à du P25 (7,2 mg/m³ pendant 4 mois, puis 14,8 mg/m³ pendant 4 mois et
570 enfin 9,4 mg/m³ pendant 16 mois). Des tumeurs similaires ont également été rapportées chez des
571 rats après une instillation répétée de P25 (Pott et al. (2005)).

572 *A contrario*, aucun effet promoteur n'a été identifié dans deux études réalisées par instillation (Xu et
573 al. (2010); Yokohira et al. (2009)). Cependant, les protocoles de ces différentes études présentaient
574 des biais méthodologiques (pas d'information sur la cristallinité du TiO₂-NP, peu d'expérience avec
575 le modèle utilisé, pas de justification du choix des marqueurs et des critères d'évaluation des
576 tumeurs etc...) ne permettant pas d'utiliser ces études pour la construction d'une valeur de
577 référence.

578 **En conclusion, le TiO₂-NP est considéré comme un agent cancérogène chez le rat à des**
579 **concentrations induisant une inflammation pulmonaire et une altération de la clairance**
580 **pulmonaire.** Les données épidémiologiques sont inadéquates pour conclure à la pertinence de cet
581 effet chez l'Homme. Ces conclusions sont en accord avec celle du CIRC (2010), qui a classé le TiO₂
582 comme cancérogène possible pour l'Homme (groupe 2B) et du RAC⁸ (2017) concluant que le TiO₂
583 doit être classé comme cancérogène suspecté (catégorie 2) selon le règlement CLP n°1272/2008.

584

585

586

587 **Construction des VLEP**

588 **VLEP-8h**

589 *Choix de l'effet critique*

590 Sur la base des données disponibles chez l'animal, le TiO₂-NP induit des effets au niveau pulmonaire
591 (à la fois néoplasiques et non-néoplasiques), du système cardiovasculaire, du cerveau, du foie et
592 des reins. Des effets sur le développement ont également été rapportés après une exposition
593 gestationnelle chez le rongeur.

594 L'analyse de l'ensemble des études de toxicité répétée réalisées par inhalation identifie
595 l'inflammation pulmonaire comme effet critique, c'est-à-dire l'effet apparaissant aux concentrations
596 les plus faibles. L'inflammation pulmonaire est rapportée à des concentrations supérieures ou égales
597 à 2 mg/m³ chez le rat. Des atteintes pulmonaires plus sévères, incluant une tumorigénèse,
598 apparaissent chez le rat à des concentrations plus élevées (≥ 10 mg/m³).

599 Les études visant à l'identification d'autres organes cibles n'ont été réalisées qu'à une seule
600 concentration, souvent bien supérieure à 2 mg/m³. Ainsi, les effets sur le système cardiovasculaire
601 ont été rapportés à la concentration de 6 mg/m³, les effets sur le cerveau et sur le développement à
602 la concentration de 10 mg/m³ et les effets sur le foie à la concentration de 42 mg/m³. Concernant les
603 effets sur les reins, la seule étude identifiée a été réalisée par instillation.

604 - Extrapolation de l'animal à l'Homme

⁸ Risk Assessment Committee (ou CER : Comité d'évaluation des risques) de l'ECHA (European Chemicals Agency)

605 Les données expérimentales suggèrent que le rat est particulièrement sensible à la toxicité
606 pulmonaire du TiO₂-NP en comparaison à d'autres rongeurs. En effet, des différences inter-espèces
607 claires ont été observées dans l'étude de Bermudez et al. (2004) réalisée avec du P25 pendant 13
608 semaines chez des femelles de trois espèces : rats, souris et hamsters. Les lésions pulmonaires
609 étaient plus sévères et apparaissaient à des concentrations plus faibles chez le rat, qui était la seule
610 espèce à développer des lésions fibro-prolifératives. Ces différences inter-espèces pourraient être
611 expliquées, au moins en partie, par des différences dans leur système de détoxification. En effet,
612 une augmentation des niveaux de concentration de certains antioxydants a été observée dans les
613 tissus pulmonaires chez les souris par rapport aux rats, après une exposition particulière
614 (Oberdörster, 1995). Par ailleurs, il est reconnu que les hamsters ont un système de clairance
615 pulmonaire très efficace, ceci étant démontré par un temps de demi-vie du TiO₂ P25 au niveau
616 pulmonaire très inférieur dans cette espèce par rapport aux rats ou souris (Bermudez et al. (2004)).

617 Il existe des différences de distribution/dépôt entre les poumons des rats et de l'Homme, qui résultent
618 d'importantes différences anatomiques au niveau des bifurcations bronchiques. Ainsi, chez
619 l'Homme, les particules se déposent massivement dans le tissu interstitiel au niveau des zones
620 proches des bifurcations bronchiques. Chez le rat, un dépôt plus intense et plus uniforme au niveau
621 des alvéoles est observé dans la périphérie pulmonaire, au niveau des bronchioles terminales et
622 des zones alvéolaires immédiatement adjacentes, avec une clairance pulmonaire plus rapide que
623 chez l'Homme. Malgré ces différences, l'Homme et le rat présentent, après une exposition
624 particulière, des réactions physiopathologiques comparables incluant une fibrose interstitielle
625 diffuse, une lipoprotéinose, une fibrose et une hyperplasie des alvéoles et des bronchioles. Ainsi,
626 les effets pulmonaires rapportés chez le rat sont considérés extrapolables à l'Homme (NIOSH,
627 2011).

628

629 **Le CES retient donc l'inflammation pulmonaire comme effet critique.**

630

631 *Choix de l'étude clé*

632 Les données humaines ont toutes été considérées comme inadéquates pour l'établissement de la
633 VLEP-8h.

634 Parmi les études expérimentales de toxicité répétée, la majorité a été réalisée par instillation intra-
635 trachéale, ce qui ne permet pas de les utiliser pour l'élaboration de la VLEP-8h. En effet, en induisant
636 un effet *bolus*, et en passant outre le passage des voies aériennes supérieures, ce mode
637 d'administration n'est pas jugé représentatif d'une exposition par inhalation.

638 Parmi les quelques études de toxicité par inhalation disponibles (Ma-Hock et al. (2009); Landsiedel
639 et al. (2014); Yu et al. (2015); Oyabu et al. (2017), Bermudez et al. (2004)), l'étude de Bermudez et
640 al. (2004) a été retenue comme étude clé. En effet, il s'agit d'une étude de toxicité sub-chronique
641 réalisée avec plusieurs concentrations et sur une forme de TiO₂-NP bien caractérisée par l'OCDE
642 (P25). La caractérisation du matériel testé est jugée essentielle vu la diversité des formes de TiO₂-
643 NP disponibles sur le marché, présentant des propriétés physicochimiques différentes pouvant
644 impacter sa réactivité et sa cinétique. Néanmoins, certaines limites méthodologiques ont été
645 identifiées dans cette étude :

- 646 • comme seule la toxicité pulmonaire a été analysée, il n'est pas possible de savoir si
647 l'inflammation pulmonaire est réellement l'effet le plus sensible. C'est cependant le cas dans
648 la majorité des études par inhalation disponibles ;
- 649 • seules des femelles ont été utilisées. Ce point n'est pas jugé critique, car il n'est pas attendu
650 de forte variabilité inter-sexe quant à la réponse inflammatoire ;

- 651 • les rats ont été exposés corps entier, alors qu'actuellement l'exposition par nez seul est
652 privilégiée par l'OCDE. Cependant, au regard de l'effet critique, il n'est pas attendu d'impact
653 majeur de ce mode d'administration. Ceci a été confirmé par Oyabu et al. (2016) qui ont
654 comparé les réponses inflammatoires pulmonaires après une exposition au TiO₂-NP par ces
655 deux modes d'administration ;
- 656 • étant donné que le P25 n'a pas été dispersé avant exposition, les animaux ont été davantage
657 exposés à de grands agglomérats plutôt qu'à des particules libres ou à des petits agrégats.
658 Même si cela n'est pas protecteur, considérant que les particules de plus petites tailles
659 présentent une plus forte réactivité, cette exposition semble plus proche de la réalité de
660 l'exposition chez l'Homme.

661 **Au vu de ces données, et au regard des autres études disponibles, l'étude de Bermudez et**
662 **al. (2004) reste l'étude la plus pertinente pour l'établissement de la VLEP-8h, et est donc**
663 **retenue comme étude clé.** Il est également à noter que les autres études de toxicité répétée par
664 inhalation, même si elles sont réalisées avec d'autres formes de TiO₂-NP et avec des durées
665 d'exposition inférieures (Ma-Hock et al. (2009); Landsiedel et al. (2014); Yu et al. (2015); Oyabu et
666 al. (2017)) confortent les résultats de Bermudez et al. (2004).

667

668 *Choix de la dose critique*

669 A ce jour, la plupart des études réalisées avec du TiO₂-NP expriment les expositions en mg/m³. De
670 nombreuses discussions sont en cours sur la façon d'exprimer les concentrations pour les particules
671 faiblement solubles et en particulier celles sous forme nanométriques. En effet, les concentrations
672 peuvent également être exprimées en aire de surface, en nombre de particules ou en volume.
673 Certaines études suggèrent que la réponse biologique dépend davantage de l'aire de surface que
674 de la masse (Oberdorster (2002), NIOSH (2011)). L'expression de la concentration en masse reste
675 cependant toujours pertinente et a le mérite d'être communément utilisée (Sager and Castranova
676 (2009), Noel et al. (2017), NIOSH (2011)). Ainsi, en l'absence de consensus, l'expression de la
677 concentration en mg/m³ est retenue pour la dérivation de la VLEP-8h.

678 D'après l'étude de Bermudez et al. (2004), les effets rapportés chez le rat à la concentration de 0,5
679 mg/m³ sont une diminution réversible du poids corporel, la présence de particules dans les
680 macrophages alvéolaires et une faible accumulation de macrophages dans les poumons. A la
681 concentration de 2 mg/m³, des hypertrophies et hyperplasies des cellules alvéolaires de type II et
682 une augmentation réversible de la réplication des cellules alvéolaires et bronchiolaires sont
683 également observées, ainsi qu'une accumulation des macrophages alvéolaires. Les effets
684 deviennent plus sévères à la concentration de 10 mg/m³ avec des changements métaplasiques dans
685 la région centro-acinaire.

686 Sur la base de l'effet d'augmentation de la prolifération cellulaire, dans un premier temps, une
687 modélisation BMD a été réalisée, considérant l'existence d'une relation dose réponse. Cependant,
688 cette approche a été écartée aux motifs suivants : faible nombre d'animaux analysés par dose pour
689 le paramètre considéré (n=5) et forte variabilité interindividuelle. Certains critères d'acceptation
690 d'une BMD n'étaient en effet pas remplis (US EPA, 2012) :

- 691 • Le ratio BMD/BMDL est d'environ 10, ce qui démontre une forte incertitude ;
- 692 • La BMDL est 10 fois plus faible que la plus faible dose testée;
- 693 • La valeur de la BMD se situe entre le groupe contrôle et la plus faible dose.

694 Une BMD ne pouvant pas être établie, un couple NOAEL/LOAEC est proposé.

695 **Sur la base des effets précédemment décrits, la LOAEC retenue est donc de 2 mg/m³ et la**
696 **NOAEC de 0,5 mg/m³.**

697

698 *Choix de l'hypothèse de construction*

699 Les substances cancérigènes sont traditionnellement divisées en deux catégories selon le mode
700 d'action: génotoxique ou non génotoxique.

701 Comme indiqué ci-dessus, le TiO₂-NP est un génotoxique faible, dont l'effet n'apparaît qu'à des
702 doses élevées et avec une relation dose-réponse identifiée dans de nombreuses études
703 expérimentales. Les données disponibles indiquent qu'une génotoxicité secondaire, consécutive à
704 un stress oxydatif, serait le principal mécanisme d'action. Les effets cancérigènes apparaissent
705 également à des concentrations élevées, associées à une altération de la clairance pulmonaire et à
706 une réponse inflammatoire.

707 La qualité des études est importante pour évaluer la génotoxicité d'une substance et choisir entre la
708 construction d'une VLEP-8h à seuil ou sans seuil. Pour le TiO₂-NP, la majorité des résultats positifs
709 sont obtenus à partir de tests des comètes. Bon nombre des tests des comètes disponibles ont été
710 réalisés *in vitro*. Ce test des comètes *in vitro* n'est pas un protocole faisant l'objet d'une ligne
711 directrice de l'OCDE, qui sont considérées comme des protocoles standards pour évaluer la
712 mutagénicité des substances chimiques. De plus, ces tests mesurent les lésions précoces de l'ADN
713 qui peuvent être réparées par la suite (Charles et al. (2018)).

714 Pour chercher à évaluer la génotoxicité d'une substance chimique, Brusick *et al.* (2016), dans une
715 approche fondée sur le poids de la preuve, ont attribué un faible poids de preuve à ce type de tests.
716 L'OCDE précise que « lors de l'évaluation du potentiel mutagène d'un produit chimique à l'essai, il
717 faudrait accorder plus de poids à la mesure des changements permanents de l'ADN (c'est-à-dire les
718 mutations) qu'aux événements réversibles » (OCDE, 2015). Par conséquent, conformément à la
719 méthodologie Anses (2017), les réponses positives obtenues avec les tests « indicateurs » (mesure
720 des cassures de l'ADN, échanges de chromatides sœurs, etc.) sont certainement associées à
721 l'exposition mais doivent être considérées comme insuffisantes pour caractériser un effet mutagène.

722 **En conclusion : considérant la faible génotoxicité du TiO₂-NP, associé à un mécanisme**
723 **d'action génotoxique décrit dans les études comme majoritairement secondaire et du faible**
724 **poids des tests positifs disponibles pour parvenir à cette conclusion, la construction d'une**
725 **VLEP-8h à seuil est considérée comme le choix le plus pertinent pour le TiO₂-NP.**

726

727 *Ajustements allométrique et temporel*

728 Le calcul de la concentration équivalente humaine (CEH) pour le TiO₂-NP est basé principalement
729 sur la méthodologie utilisée par la « Maximale Arbeitsplatz-Konzentration » (MAK) pour le calcul de
730 la valeur limite de la fraction alvéolaire des poussières granulaires biopersistantes (MAK, 2012).

731 Cette méthodologie est fondée sur l'hypothèse d'une même sensibilité du rat et de l'Homme au TiO₂-
732 NP, pour une même dose de particules par unité de surface pulmonaire. Elle suit les étapes
733 suivantes :

734 1. Evaluation de la **fraction de dépôt** dans le poumon.

735 La fraction de dépôt pulmonaire est le ratio du nombre de particules déposées dans les poumons
736 sur le nombre de particules entrant dans le tractus respiratoire.

737 Pour estimer cette fraction, le modèle MPPD (Multiple Path Particle Dosimetry) (version 3.04, 2016)
738 a été utilisé. Ce modèle a été développé par le Chemical Industry Institute of Toxicology (CIIT), NC
739 (Caroline du Nord), USA, et l'Institut néerlandais de santé publique et de l'environnement
740 (Rijksinstituut voor Volksgezondheid en Milieu (RIVM)). Les valeurs physiologiques (volumes
741 courant, fréquence respiratoire...) utilisées dans les calculs sont celles rentrées par défaut dans le
742 modèle MPPD (cf. ci-dessous). Les demi-vies d'élimination sont issues des publications de Brown
743 et al. (2005) pour le rat et Kreyling and Scheuch (2000) pour l'Homme.

744 Rat : 0,056 (sans unité)

745 Homme : 0,1032 (sans unité)

746 2. Calcul du **volume de dépôt**, en m³/jour :

747 *Volume de dépôt = fraction de dépôt x volume courant x fréquence respiratoire x temps d'exposition*

748 Rat : volume de dépôt = 0,056 x (2,1/1 000 000) x 102 x 60 x 6 x 5/7 = 0,003084 m³/jour

749 2,1 mL = volume courant du rat

750 102/min = fréquence respiratoire du rat

751 60 min x 6 h x 5/7 j = temps d'exposition de l'étude, exprimée en jours

752 Homme : volume de dépôt = 0,1032 x (1040/1 000 000) x 20 x 60 x 8 x 240/365 = 0,677 m³/jour

753 1040 mL = volume courant de l'Homme

754 20/min = fréquence respiratoire de l'Homme

755 60 min x 8 h x 240/365 j = temps d'exposition, exprimé en jours

756 3. Calcul de la **constante d'élimination**, en jours :

757 *Constante d'élimination = -ln(0,5)/Demi-vie d'élimination*

758 Rat : Constante d'élimination = -(ln0,5)/60⁹ = 0,0116/jour

759 Homme : Constante d'élimination = -(ln0,5)/400¹⁰ = 0,00173/jour

760 4. Calcul de la **charge pulmonaire** à l'état d'équilibre, en m³ :

761 *Charge pulmonaire à l'état d'équilibre = volume de dépôt / constante d'élimination*

762 A noter que la charge pulmonaire à l'état d'équilibre exprimée en mg est obtenue en multipliant cette
763 valeur par la concentration de poussières dans l'air en mg/m³, c'est-à-dire la NOAEC.

764 Rat : Charge pulmonaire à l'état d'équilibre = 0,003084/0,0116 = 0,2659 m³

765 Homme : Charge pulmonaire à l'état d'équilibre = 0,677/0,00173 = 391,61 m³

766 5. Enfin, la charge pulmonaire ramenée à la surface des poumons est calculée pour le rat et
767 l'Homme et le rapport de ces valeurs est utilisé pour le calcul de la **concentration**
768 **équivalente humaine** en multipliant par la NOAEC :

769 *NOAEC_{CEH} = NOAEC x (charge pulmonaire à l'état d'équilibre/surface spécifique pulmonaire)_{rat} / (charge*
770 *pulmonaire à l'état d'équilibre /surface spécifique pulmonaire)_{humain}*

771 **NOAEC_{CEH}** = 0,5 x (0,2659/0,297¹¹)/(391,61/57,22¹¹) = 0,5 x (0,8953/6,84) = 0,5 x 0,1309

772 **NOAEC_{CEH}** = 0,065 mg/m³

773

774 *Choix des facteurs d'ajustement*

775 Le calcul de la VLEP-8h à partir de la NOAEC_{CEH} a été effectué à l'aide des facteurs d'ajustement
776 suivants (Anses, 2017) :

⁹ Brown et al. 2005, confirmé par les résultats de Bermudez et al. 2004

¹⁰ Kreyling and Scheuch 2000

¹¹ U.S. EPA, 2009, en m²

- 777 • Variabilité inter-espèces (FA_A) : l'ajustement allométrique réalisé par modélisation a permis
778 le calcul d'une concentration équivalente humaine. Tel que prévu dans le guide
779 méthodologique, une valeur de **3** a été retenue pour prendre en compte la variabilité
780 toxicodynamique et les incertitudes résiduelles.
- 781 • Variabilité inter-individuelle (FA_H) : en l'absence de données permettant de réduire le facteur
782 par défaut, une valeur de **3** a été retenue.
- 783 • Transposition subchronique – chronique (FA_S) : L'étude clé pour la construction de la VLEP
784 (Bermudez et al., 2004) est une étude de toxicité subchronique. En l'absence de données
785 permettant d'exclure que des concentrations plus faibles seraient suffisantes pour induire un
786 effet suite à de plus longues expositions, la valeur par défaut de **3** a été retenue.
- 787 • Utilisation d'une BMDL, LOAEC ou NOAEC (FA_L) : une valeur de 1 a été retenue, le point de
788 départ étant une NOAEC.
- 789 • Incertitudes dues aux lacunes de la base de données (FA_D) : La plupart des études réalisées
790 sur le TiO₂-P25 ne sont pas jugées fiables pour l'évaluation des risques chroniques
791 (administration intratrachéale, une seule concentration élevée testée, aucune étude
792 chronique). De plus, plusieurs études de toxicité à doses répétées ont montré des effets sur
793 d'autres organes que les poumons (système cardiovasculaire, foie, reins...). Cependant,
794 comme la majorité des études de toxicité par inhalation à doses répétées n'ont investigué
795 qu'un seul paramètre à la fois, on ne peut exclure que les autres effets nocifs puissent
796 survenir à des concentrations infra-inflammatoires. Dans ce contexte, la valeur **3** a été
797 retenue.

798

799 Le facteur d'incertitude global pour la dérivation de la VLEP-8h est donc de **81**.

800

801 *Proposition de VLEP-8h*

802 Une VLEP-8h de **0,80 µg/m³** a été dérivée.

803

804 Cette valeur est directement applicable au P25 qui est la forme de TiO₂ testée dans l'étude de
805 Bermudez et al. (2004).

806 La pertinence de cette valeur pour les autres formes de TiO₂-NP n'a pu être évaluée considérant
807 l'existence de plus de 350 formes différentes de TiO₂ ayant des propriétés physicochimiques variées.
808 En effet, sur la base de la littérature disponible, les propriétés intrinsèques d'un nanomatériau
809 semblent influencer sa cinétique et sa réactivité.

810 Concernant la **taille** du TiO₂, il est attendu une plus forte réactivité des nanoparticules en
811 comparaison des particules sous forme micrométrique, du fait d'une augmentation de la réponse
812 pulmonaire consécutive à une altération de la clairance, d'une plus longue biopersistance et d'une
813 pénétration plus en profondeur dans les régions interstitielles des alvéoles. Ainsi, de nombreuses
814 publications rapportent une inflammation pulmonaire plus sévère avec des formes plus petites de
815 TiO₂-NP (Drew et al. (2017), Halappanavar et al. (2015), Hashizume et al. (2016), Kobayashi et al.
816 (2009), Rahman et al. (2017), Noel et al. (2013)). Cependant, *a contrario*, d'autres auteurs n'ont pas
817 identifié de lien direct entre inflammation et taille des particules de TiO₂ (Li et al. (2007), Rossi et al.
818 (2009), Roursgaard et al. (2011)).

819 L'importance de la **phase cristalline** sur la toxicité a été confirmée par de nombreux auteurs (Okada
820 et al. (2016), Warheit et al. (2007), Rushton et al. (2010), Rahman et al. (2017) and Numano et al.
821 (2014), Roursgaard et al. (2011), Park et al. (2014)), même si l'ensemble des données disponibles
822 à ce jour ne permet pas d'identifier la forme cristalline la plus toxique.

823 La présence d'un **revêtement de surface** peut également influencer sur la cinétique, la production
824 d'espèces réactives et les interactions du TiO₂-NP avec les macromolécules mais aussi
825 potentiellement libérer des substances toxiques issues de ce revêtement. Bien que cette question
826 ait été peu étudiée, il ressort de la littérature que les formes revêtues avec de l'alumine, avec des
827 groupes amino- chargés positivement, avec des substances hydrophiles ou avec de la silice,
828 pourraient induire une plus forte inflammation pulmonaire, en comparaison avec les formes non
829 revêtues en surface (Hashizume et al. (2016), Halappanavar et al. (2015), Rahman et al. (2017),
830 Rossi et al. (2009)).

831 Enfin, l'influence des **différentes formes** de TiO₂-NP, telles que les nanosphères, les nanotubes,
832 les nano-fibres etc..., sur la toxicité pulmonaire a été étudiée dans la littérature. Il est généralement
833 montré que les formes fibreuses sont plus toxiques que les formes sphériques (Hamilton et al.
834 (2009), Porter et al. (2013), Silva et al. (2013)). Cependant, ces études ont été réalisées avec du
835 TiO₂-NP fabriqué en laboratoire et la présence des formes non sphériques sur le marché européen
836 reste à ce jour à définir.

837 **Il ne peut pas être établi à ce stade que les données disponibles sur le P25 soient**
838 **représentatives de toutes les formes de TiO₂-NP. Il ne peut pas également être exclu, en l'état**
839 **actuel des connaissances, que le P25 soit moins toxique que d'autres formes de TiO₂-NP.**

840

841 **VLCT-15min**

842 Faute de données disponibles quant aux effets toxiques à court terme du TiO₂-NP, afin de limiter
843 l'importance et le nombre de pics d'exposition, le CES VLEP recommande, conformément à sa
844 méthodologie (Anses, 2017), de ne pas dépasser sur une période de 15 minutes la valeur de 5 fois
845 la valeur de la VLEP-8h, soit 4 µg.m⁻³.

846 Ainsi le CES VLEP recommande une VLCT-15 min pragmatique de **4 µg.m⁻³**.

847

848 **Mention « peau »**

849 Au regard de l'absence de pénétration cutanée du TiO₂-NP, comme conclu par le Comité scientifique
850 pour la sécurité des consommateurs (SCCS, 2014), l'attribution de la mention « peau » n'apparaît
851 pas nécessaire.

852

853 **Mention « bruit »**

854 Aucune étude disponible ne suggère d'effet ototoxique du TiO₂-NP. En conséquence, la mention
855 « bruit » n'est pas attribuée.

856

857

858

859 **Annexe**

860

861 Trois experts du CES VSR ont exprimé une position divergente et un expert du CES VSR s'est
862 abstenu durant la validation de l'avis.

863 Leur position est présentée ci-dessous.

864

865 « Le calcul de la concentration sans effet chez l'homme (NOAEC_{CEH}) de 65 µg.m⁻³ à partir de la
866 NOAEC chez le rat (500 µg.m⁻³), selon la méthodologie MAK décrite dans le rapport, ne nous paraît
867 pas discutable ; en revanche, le choix ou les justifications apportées pour certains facteurs
868 d'ajustement le sont.

869 En particulier :

870

- Un FA_S de 3 a été retenu alors que la NOAEC_{CEH} prend en compte :

871

1. le calcul du taux de dépôt pulmonaire humain pour une exposition 8h/j et 5j/ semaine,
872 240j/an, vie-entière ;

873

2. la différence de demi-vie d'élimination (épuration) chez l'Homme (400 jours) par
874 rapport à celle du rat (60 jours) ;

875

3. le fait qu'il s'agit d'un composé à seuil d'effet dans l'espèce la plus sensible. Les
876 données expérimentales suggèrent en effet que le rat est particulièrement sensible à
877 la toxicité pulmonaire du TiO₂-NP en comparaison à d'autres rongeurs (souris et
878 hamsters) ; mais aussi par rapport au singe et à l'homme (cf § 4.4 du Rapport
879 d'expertise collective).

880

- Un FA_A de 3 a été retenu alors qu'à l'état d'équilibre de la charge pulmonaire, la sensibilité
881 du rat, considéré comme l'espèce la plus sensible, et de l'Homme ne diffère pas pour une
882 même dose par m² de surface pulmonaire. Par ailleurs, la composante toxicodynamique
883 devrait être limitée en comparaison avec les agents solubles ou sous forme de vapeur car le
884 TiO₂ est pratiquement insoluble.

885

- Enfin, un FA_D de 3 a aussi été retenu sur l'argument : « *it cannot be ruled out that other
886 adverse effects could occur at sub-inflammatory concentrations.* ». Il y a toujours lieu de
887 s'interroger sur la qualité de la base de données, mais l'ensemble du corpus de données
888 scientifiques actuelles ne suggère pas d'effet pouvant survenir à des concentrations
889 d'exposition plus faibles que celles sans effet observé. Aucun des dossiers VLEP traités
890 jusqu'à présent ne fournissait des données absolument exhaustives sur tous les organes et
891 toutes les fonctions biologiques. Ainsi, il nous semble qu'appliquer un FA_D de 3 dans le
892 présent dossier sur la seule base « on ne peut exclure que » devrait impliquer d'appliquer
893 pareil facteur systématiquement dans tous les dossiers VLEP et VTR. Cela nous semble
894 inapproprié. »

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Collective Expert Appraisal Report

Document for consultation / Document pour consultation

Acronyms and abbreviations

921		
922	Ach	Acetylcholine
923	AF	Adjustment Factors
924	ANSES	<i>Agence Nationale de Sécurité Sanitaire de l'alimentation, de l'environnement et du travail</i> [French Agency for Food, Environmental and Occupational Health & Safety]
925		
926	ALP	Alkaline Phosphatase
927	ALT	Alanine aminotransferase
928	AST	Aspartate Transaminase
929	BALF	Bronchoalveolar Fluid
930	BER	Base Excision Repair
931	BET	Brunauer–Emmett–Teller surface area analysis
932	BMD	Benchmark Dose
933	BUN	Blood Urea Nitrogen
934	BSA	Bovine Serum Albumin
935	BW	Body Weight
936	CAMKIV	Calcium/calmodulin-dependent protein kinase type IV
937	CES	ANSES Expert Committee
938	CIIT	Chemical Industry Institute of Toxicology
939	CINC-1	Cytokine-Induced Neutrophil Chemoattractant 1
940	CLP	<i>Classification Labelling and Packaging</i>
941	CMR	Carcinogenic, Mutagenic, Reprotoxic
942	COX	Cyclo-oxygenase
943	CRC	Chemical Rubber Company
944	DAF	Dosimetric Adjustment Factor
945	DGCCRF	<i>Direction Générale de la Concurrence, de la Consommation et de la Répression des Fraudes</i> [Directorate General for Competition Policy, Consumer Affairs and Fraud Control]
946		
947		
948	DFOSB	Truncated form of FosB missing the C-terminal 101 amino acids
949	DGS	<i>Direction Générale de la Santé</i> [Directorate General for Health]
950	DHPN	N-bis(2-hydroxypropyl)nitrosamine
951	DLS	Dynamic Light Scattering
952	DNA	Deoxyribonucleic acid
953	DNEL/DMEL	Derivative No Effect Level / Derivative Minimum Effect Level
954	DSP	Daily Sperm Production
955	ECHA	European Chemicals Agency
956	ESTR	Expanded Simple Tandem Repeat
957	FGF-18	Fibroblast Growth Factor-18
958	FIOH	Finnish Institute of Occupational Health
959	FOSB	FBJ murine osteosarcoma viral oncogene homolog B
960	GD	Gestational Day

961	GLP	Good Laboratory Practice
962	GSD	Geometric Standard Deviation
963	HCSP	High Council for Public Health
964	HDL-C	High-Density Lipoproteins Cholesterol
965	HEC	Human Equivalent Concentration
966	HIF-1 α	Hypoxia-Inducible factor 1-alpha
967	HMPC	Hydroxypropylmethylcellulose
968	HO-1	Heme oxygenase 1
969	IARC	International Agency for Research on Cancer
970	IFN- γ	Interferon gamma
971	IL	Interleukine
972	INERIS	<i>Institut national de l'environnement industriel et des risques</i> [French National Institute
973	For Industrial	Environment And Risks]
974	LDH	Lactate Dehydrogenase
975	LY/LYP	Lymphocytes/Percentage of Lymphocytes
976	LOAEC	Lowest-Observed-Adverse-Effect Level
977	M-CSF	Macrophage Colony-Stimulating Factor
978	MAK	Maximale Arbeitsplatz-Konzentration
979	MCP	Monocyte Chemoattractant Protein
980	MCV	Mean Corpuscular Volume
981	MDA	Maleic Dialdehyde
982	MDC	Macrophage-Derived Chemokine
983	MIP-2	Macrophage Inflammatory Protein 2
984	MMAD	Mass Median Aerodynamic Diameter
985	MMP-9	Matrix Metalloproteinase 9
986	MPPD	Multiple Path Particle Dosimetry
987	NER	Nucleotide Excision Repair
988	NIOSH	National Institute for Occupational Safety and Health
989	NMDA	<i>N</i> -methyl-D-aspartate
990	NO	Nitric Oxid
991	NOAEC	No-Observed-Adverse-Effect Level
992	NP	Nanoparticle
993	NK	Natural Killer
994	OECD	Organisation for Economic Co-operation and Development
995	OEL	Occupational Exposure Limit
996	OVA	Ovalbumin
997	PBS	Phosphate-Buffered Saline
998	PBS-HEC	Phosphate-Buffered Saline - Hydroxyethyl cellulose
999	PCNA	Proliferating Cell Nuclear Antigen
1000	PMN	Polymorphonuclear Neutrophils

1001	PND	Postnatal Day
1002	QSAR	Quantitative structure-activity relationship
1003	RAC	Risk Assessment Committee
1004	REACH	Regulation (EC) No 1907/2006 of 18/12/06 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
1005		
1006	RDI	Relative Deposition Index
1007	RDW	Red Blood Cell Distribution Width
1008	RIVM	<i>Rijksinstituut voor Volksgezondheid en Milieu</i> [Netherlands National Institute for Public Health and the Environment]
1009		
1010	RMOA	Risk Management Option Analysis
1011	RNA	Ribonucleic Acid
1012	RNS	Reactive Nitrogen Species
1013	ROS	Reactive Oxygen Species
1014	RT-PCR	Reverse Transcription Polymerase Chain Reaction
1015	SAA	Serum Amyloid A
1016	SMR	Standardized Mortality Ratio
1017	SNP	Sodium Nitroprusside
1018	TG	Triglycerides
1019	TEM	Transmission Electron Microscopy
1020	TiO ₂	Titanium dioxide
1021	VEGF- α	Vascular Endothelial Growth Factor-alpha
1022	VT	Tidal Volume
1023	WBC	White Blood Cell
1024		

1025

Preamble

1026 The French system for establishing Occupational Exposure Limits OELVs has three clearly distinct
1027 phases:

- 1028 - Independent scientific expertise (the only phase entrusted to Anses);
- 1029 - Proposal by the Ministry of Labour of a draft regulation for the establishment of limit values,
1030 which may be binding or indicative;
- 1031 - Stakeholder consultation during the presentation of the draft regulation to the French Steering
1032 Committee on Working Conditions (COCT). The aim of this phase is to discuss the
1033 effectiveness of the limit values and if necessary to determine a possible implementation
1034 timetable, depending on any technical and economic feasibility.

1035 The organisation of the scientific expertise phase required for the establishment of Occupational
1036 Exposure Limits (OELVs) was entrusted to the agency in the framework of the French 2005-2009
1037 Occupational Health Plan (PST).

1038

1039 In 2015, Anses submitted a proposal of classification to the European Chemicals Agency (ECHA)
1040 for the carcinogenicity by inhalation of TiO₂ (carcinogenic category 1B) under European Regulation
1041 (CLP) N° 1272/2008 on the classification, labelling and packaging of dangerous substances and
1042 mixtures. In 2017, ECHA's Risk Assessment Committee (RAC) concluded that TiO₂ in all its forms
1043 should be classified as a suspected human carcinogen of category 2 by inhalation.

1044 Anses was requested by the Directorate General for Health (DGS), Directorate General for Risk
1045 Prevention (DGPR) and Directorate General for Labour (DGT) on 4 July 2017 to establish a chronic
1046 TRV by inhalation for TiO₂ under nanoform. This request under the terms of the referral is the result
1047 of "the analysis of the R-Nano database indicating that many industrial sites in France use titanium
1048 dioxide under nanoform. These uses can lead to exposure of workers but also to exposure of
1049 populations via off-site emissions". The referral notes that "the International Agency for Research on
1050 Cancer (IARC) has classified titanium dioxide as respirable particles as a possible carcinogen by
1051 inhalation". An opinion was published in April 2019 defining a TRV applicable only to TiO₂-P25 of
1052 0.12 µg/m³, with a confidence level moderate (Anses, 2019). Following this work, and in accordance
1053 with the corresponding protocol of agreement, Anses launched the work for the establishment of
1054 OELs.

1055 In addition, under the REACH regulation, Anses is currently examining a dossier for assessing the
1056 hazards and risks of TiO₂ to human health and the environment. As part of the examination of this
1057 dossier, additional data on the hazards and uses of TiO₂ may be required by Anses from industry.

1058

1059 The OELs, as proposed by the "Health reference values" Committee (HRV Committee), are
1060 concentration levels of pollutants in workplace atmospheres that should not be exceeded over a
1061 determined reference period and below which the risk of impaired health is considered as negligible.
1062 Although reversible physiological changes are sometimes tolerated, no organic or functional damage
1063 of an irreversible or prolonged nature is accepted at this level of exposure for the large majority of

1064 workers. These concentration levels are determined by considering that the exposed population (the
1065 workers) is one that excludes both children and the elderly.

1066 These concentration levels are determined by the HRV Committee experts based on information
1067 available from epidemiological, clinical and animal toxicology studies. Identifying concentrations that
1068 are safe for human health are the results of correction factors applied to the values identified directly
1069 by the studies. These corrections factors take into account a number of uncertainties inherent to the
1070 extrapolation process conducted as part of an assessment of the health effects of chemicals on
1071 humans.

1072 The Committee recommends the use of three types of values:

- 1073 - 8-hour occupational exposure limit (8h-OEL): this corresponds to the limit of the time-
1074 weighted average (TWA) of the concentration of a chemical in the worker's breathing zone
1075 over the course of an 8-hour work shift. In the current state of scientific knowledge (toxicology,
1076 medicine and epidemiology), the 8h-OEL is designed to protect workers exposed regularly
1077 and for the duration of their working life from the medium- and long-term health effects of the
1078 chemical in question;
- 1079 - Short-term exposure limit (STEL): this corresponds to the limit of the time-weighted average
1080 (TWA) of the concentration of a chemical in the worker's breathing zone over a 15-minute
1081 reference period during the peak of exposure, irrespective of its duration. It aims to protect
1082 workers from adverse health effects (immediate or short-term toxic effects such as irritation
1083 phenomena) due to peaks of exposure;
- 1084 - Ceiling value: this is the limit of the concentration of a chemical in the worker's breathing zone
1085 that should not be exceeded at any time during the working period. This value is
1086 recommended for substances known to be highly irritating or corrosive or likely to cause
1087 serious potentially irreversible effects after a very short period of exposure.

1088 These three types of values are expressed:

- 1089 - in mg.m⁻³, i.e. in milligrams of chemical per cubic metre of air, or in ppm (parts per million),
1090 i.e. in cubic centimetres of chemical per cubic metre of air, for gases and vapours;
- 1091 - or in mg.m⁻³ only for liquid (fog) and solid (fumes) aerosols;
- 1092 - or in f.cm⁻³, i.e. in fibres per cubic centimetre for fibrous materials.

1093 The 8h-OELV may be exceeded for short periods during the working day provided that:

- 1094 - the weighted average of levels calculated over the entire working day is not exceeded;
- 1095 - the short term exposure limit value (STELV), when one exists, is not exceeded.

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1097 In addition to the OELs, the HRV Committee assesses the need to assign a "skin" notation, when
1098 significant penetration through the skin is possible. This notation indicates the need to consider the
1099 dermal route of exposure in the exposure assessment and, where necessary, to implement
1100 appropriate preventive measures (such as wearing protective gloves). Skin penetration of
1101 substances is not taken into account when determining the atmospheric limit levels, even it can
1102 potentially cause health effects even when the atmospheric levels are respected.

1103 The HRV Committee assesses the need to assign a "noise" notation indicating a risk of hearing
1104 impairment in the event of co-exposure to noise and the substance below the recommended OELs,

1105 to enable preventionists to implement appropriate measures (collective, individual and/or medical)
1106 (Anses 2017).

1107 The HRV Committee also assesses the applicable reference methods for the measurement of
1108 exposure levels in the workplace. The quality of these methods and their applicability to the
1109 measurement of exposure levels for comparison with an OEL are assessed, particularly with regards
1110 to their compliance with the performance requirements in the NF-EN 482 Standard and their level of
1111 validation¹². Once they have been assessed, these methods can be classified into one of the
1112 following categories:

- 1113 - Category 1A: the method has been recognized and validated (all of the performance criteria
1114 in the NF-EN 482 Standard are met);
- 1115 - Category 1B: the method has been partially validated (the essential performance criteria in
1116 the NF-EN 482 Standard are met);
- 1117 - Category 2: the method is indicative (essential criteria for validation are not clear enough);
- 1118 - Category 3: the method is not recommended (essential criteria for validation are lacking or
1119 inappropriate) (Anses, 2017).

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1123 **Organisation of the expert appraisal**

1124 ANSES entrusted examination of this request to the expert committee on health reference value
1125 (HRV Committee).

1126 The methodological and scientific aspects of the work were regularly submitted to the Expert
1127 Committee.

1128 The report produced takes account of observations and additional information provided by the
1129 Committee members.

1130 This expert appraisal was therefore conducted by a group of experts with complementary skills. It
1131 was carried out in accordance with the French Standard NF X 50-110 "Quality in Expertise Activities".
1132

1133 This collective expert appraisal work and its conclusions and recommendations concerning the
1134 health effects were adopted by the HRV Committee on 28 November 2019. Three experts expressed
1135 a minority opinion and one abstained. Their position is laid out in annex 3.
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1139 **Preventing risks of conflicts of interest**

1140 ANSES analyses interests declared by the experts before they are appointed and throughout their
1141 work in order to prevent potential conflicts of interest in relation to the points addressed in expert
1142 appraisals.

1143 The experts' declarations of interests are made public on ANSES's website (www.anses.fr).
1144
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¹² NF EN 482 : "Workplace atmospheres - General requirements for the performance of procedures for the measurement of chemical agents"

Description of the method

1146 For the assessment of the health effects:

1147 A toxicological profile was prepared by ANSES's officers and submitted to the HRV Committee,
1148 which commented on it and added to it.

1149 The toxicological profile is mainly based on bibliographical information taking into account the
1150 scientific literature published on this substance until January 2018. The bibliographical research was
1151 conducted in the two following databases: Medline and Scopus®. The secondary literature of IARC,
1152 OECD, NIOSH, ECHA, EFSA and SCCS as well as the Anses's harmonized proposal for
1153 classification and labelling (Anses, 2016) have also been taken into account.

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Part A – Report on assessment of health effects

Document for consultation / Document pour consultation

1 General information

1.1 Substance identification

Table 1: Substance identity

Name	Titanium Dioxide
CAS number	13463-67-7 (All forms) 1317-70-0 (Anatase) 1317-80-2 (Rutile) 12188-41-9 (Brookite)
EC number	236-675-5
Synonyms	Dioxotitanium
Molecular formula	TiO ₂
Structural formula	

1173

1174 TiO₂ exists under micro and nanosize. The present report refers specifically to TiO₂ under nanoform
1175 (namely TiO₂-NP in this report). According to European Commission (EC, 2011), a nanomaterial
1176 means:

1177 *“A natural, incidental or manufactured material containing particles, in an unbound state or as an*
1178 *aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size*
1179 *distribution, one or more external dimensions is in the size range 1 nm - 100 nm.*

1180 *In specific cases and where warranted by concerns for the environment, health, safety or*
1181 *competitiveness the number size distribution threshold of 50 % may be replaced by a threshold*
1182 *between 1 and 50 %.”*

1183

1.2 Discussion on different forms of TiO₂ under nanoform

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1185
1186 Intrinsic physico-chemical properties of a nanomaterial, such as particle crystallinity, size, surface
1187 area and surface modification, are presumed to influence its reactivity and behaviour.

1188 Regarding **crystallinity**, three main naturally titanium dioxide polymorphs exist: rutile, anatase and
1189 brookite, the most commonly studied and used being rutile and anatase (Carp, Huisman, and Reller
1190 2004, NIOSH 2011, IARC 2010).

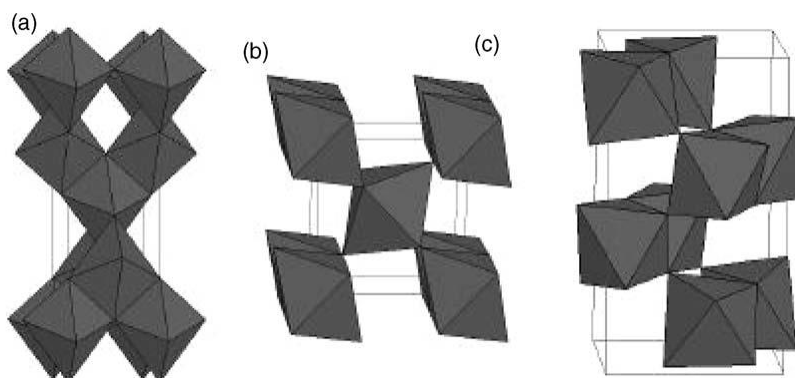


Figure 1 : Crystal structures of anatase (a), rutile (b), and brookite (c) from Carp, Huisman, and Reller (2004)

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The importance of **crystal form** in assessing the pulmonary toxicity of TiO₂-NP was confirmed by different authors but with contradictory conclusions.

A distinct inflammatory potential was noted by Aragao-Santiago et al. (2016) between anatase TiO₂-NP and rutile TiO₂-NP, in which the latter did not induce inflammatory response. Okada et al. (2016) found that mixed-crystal phase and amorphous TiO₂-NP engender the most severe fibrosis compared to anatase and rutile forms. Warheit et al. (2007) and Rushton et al. (2010) also observed a more pronounced inflammation with mixed-crystal phase. In contrast, Rahman et al. (2017) and Numano et al. (2014) reported a higher overall biological response of the lung with rutile compared to anatase. A higher inflammatory response for rutile form compared to anatase and amorphous TiO₂-NP was also reported by Roursgaard et al. (2011); but in addition, they identified amorphous polymorph TiO₂-NP as the most potent in regard to acute tissue damage, based on the level of total protein in bronchoalveolar fluid (BALF). Park et al. (2014) studied differences in pulmonary toxicity of anatase and brookite TiO₂-NP nanorods prepared in laboratory. They found that the brookite form caused more severe and frequent lesions in the lung than the anatase form, along with higher cytokine levels in BALF.

Regarding **particle size**, nanoparticles are expected to be more reactive than bulk materials with an increase in the pulmonary response due to a delayed clearance, longer biopersistence and deeper penetration into interstitial regions of alveoli. In particular, Drew et al. (2017) found that metrics related to particle size (such as density, surface area and diameter) appeared to be the most predictive for estimating potency of a nanomaterial in eliciting pulmonary inflammation. A similar conclusion – the smaller the particle size, the greater the inflammatory response - is also reached by several authors when they compared the lung toxicity (gene expression response, examination of BALF, lung histopathology) after an intratracheal exposure to various forms of titanium dioxide (Halappanavar et al. 2015, Hashizume et al. 2016, Kobayashi et al. 2009, Rahman et al. 2017). Noel et al. (2013) hypothesized that the lower cytotoxicity observed for the larger TiO₂-NP could possibly be due to their less efficient penetration into cells (the smaller size of particles would facilitate their

1221 possible and rapid translocation¹³). Contrasting with these findings, other authors did not find any
 1222 evidence of a direct association between particle size and inflammatory potential of TiO₂-NP (Li et
 1223 al. 2007, Rossi et al. 2009, Roursgaard et al. 2011).

1224 Moreover, the behaviour of nanoparticles in the medium, the production of reactive oxygen and
 1225 nitrogen species or the interaction with macromolecules, can also be influenced by the **presence of**
 1226 **a coating** which may itself also release toxic material (Charles et al. 2018). Even if coated forms of
 1227 TiO₂-NP are not commonly tested in toxicological studies, some publications emphasize that it is
 1228 essential to take into account surface coating in risk assessment. Hashizume et al. (2016) reported
 1229 that Al(OH)₃-coated TiO₂-NP induced a greater pulmonary inflammatory response than non-coated
 1230 particles. Halappanavar et al. (2015) also noted that changes in the surface characteristics, such as
 1231 the addition of positively charged amino groups, can further enhance the inflammatory potential of
 1232 TiO₂-NP. Similarly, Rahman et al. (2017) demonstrated the important role of coating with an
 1233 exacerbation of the pulmonary response when animals were exposed to TiO₂-NP covered with an
 1234 hydrophilic coating, compared with no or hydrophobic coating. Among different forms of TiO₂-NP
 1235 tested, Rossi et al. (2009) found that only Si-coated rutile TiO₂-NP elicited clear pulmonary
 1236 inflammation compared to uncoated TiO₂-NP.

1237 Finally, the influence of different **shapes of TiO₂-NP** such as nanospheres, nanobelts, nanorods,
 1238 nanodots, needles, tubes, fiber-like, on lung toxicity have been studied in the literature. For example,
 1239 Hamilton et al. (2009) demonstrated that alteration of TiO₂-NP into a fibre structure greater than 15
 1240 µm creates a highly toxic particle which initiates an inflammatory response by alveolar macrophages.
 1241 Similar conclusions were reached by Porter et al. (2013) or Silva et al. (2013) who reported more
 1242 severe pulmonary responses with nanobelts compared to nanospheres. In contrast, Warheit et al.
 1243 (2006) did not find significant differences in the pulmonary responses between anatase nanodots
 1244 and anatase nanorods, despite a six-fold difference in the surface area. It is worth to note that these
 1245 publications refer to self-synthesized TiO₂-NP, which actual relevance on the European market
 1246 cannot be assessed.

1247 1.3 Physicochemical properties

1248
 1249 **Table 2: Physico-chemical properties of TiO₂ under nanoform (CRC Handbook of Chemistry and**
 1250 **Physics, Lide 2000, Weast 1991)**

State of the substance at 20°C and 101,3 kPa	Solid, crystalline, white, odourless inorganic substance.
Molecular weight (g/mol)	79.87
Boiling point	ca. 3000 °C
Melting/freezing point	Anatase: 1560 °C, Rutile: 1843 °C,

¹³ Translocation : movement away from the site of deposition either within or outside the lungs (Elder, Nordberg and Kleinman 2015)

	Brookite: 1825 °C
Relative density (g/cm ³ , 20 °C)	Anatase = 3.9, Rutile = 4.26, Brookite = 4.17
Water solubility	Not soluble
Solubility in organic solvent	Not soluble

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1253 2 Summary of scientific recommendations 1254 concerning OELs

1255 2.1 SCOEL synthesis summary

1256 No SCOEL document on TiO₂ under nanoform was available at the time of drafting this report.
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1258 2.2 Other scientific recommendations

1259 2.2.1 National Institute for Occupational Safety and Health (NIOSH, 2011)

1260 Concerning TiO₂ under nanoform, the NIOSH has established two values associated with pulmonary
1261 inflammation and lung tumors.

1262

1263 *Pulmonary inflammation*

- 1264 • Key studies: Data from four different subchronic inhalation studies in rats were used to
1265 investigate the relationship between particle surface area dose and pulmonary inflammation
1266 response (Tran et al. (1999), Cullen et al. (2002), Bermudez et al. (2002) Bermudez et al.
1267 (2004)). Data from the two Bermudez et al. studies were combined and treated as a single
1268 study for dose-response analysis purposes.
- 1269 • Critical effect: the critical dose or BMD was defined as the particle surface area per gram of
1270 lung tissue associated with a 4% inflammatory response of neutrophils in BALF.

Table 4–2. Benchmark dose estimates for particle surface area dose (m²) per gram of lung associated with pulmonary inflammation in rats (as PMNs in BALF), based on a Hill model

Data modeled	MLE	95% LCL
TiO ₂ [Tran et al. 1999]	0.0205	0.0191
TiO ₂ [Cullen et al. 2002]	0.1054	0.0861
TiO ₂ [Bermudez et al. 2002 and Bermudez et al. 2004, combined]	0.0159	0.0144

BALF = bronchoalveolar lavage fluid; LCL = lower confidence limit; MLE = maximum likelihood estimate; PMNs = polymorphonuclear leukocytes; TiO₂ = titanium dioxide.

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1272 The critical doses were then multiplied by 1.5 in order to normalize them to rats of the size used as
1273 a reference for lung surface area, as these were estimated to have lung weights of approximately
1274 1.5 grams, based on the animal's body weights. The critical doses were then extrapolated to humans
1275 based on the ratio of rat lung to human lung surface areas, which were assumed to be 0.41 m² for
1276 Fischer 344 rats, 0.4 m² for Sprague-Dawley rats, and 102.2 m² for humans (Mercer et al. 1994).
1277 These critical particle surface area doses were then converted back to particle mass dose for
1278 humans.

1279 The multiple-path particle dosimetry model (MPPD2) human lung dosimetry model (CIIT and RIVM
1280 2002) was used to estimate the working lifetime airborne mass concentrations associated with the
1281 critical doses in human lungs.

Table 4–3. Estimated mean airborne mass concentrations of fine and ultrafine TiO₂ in humans and related human lung burdens (TiO₂ surface area dose) associated with pulmonary inflammation after a 45-year working lifetime

Particle size and study	Critical dose in human lungs					
	Particle surface area (m ² /lung)		Particle mass (g/lung)		MPPD (ICRP) lung model (mg/m ³)	
	MLE	95% LCL	MLE	95% LCL	MLE	95% LCL
Fine TiO ₂ (2.1 μm, 2.2 GSD; 6.68 m ² /g):						
Tran et al. [1999]	7.86	7.32	1.18	1.10	1.11	1.03
Cullen et al. [2002]	40.39	33.00	6.30	5.15	5.94	4.86
Bermudez et al. [2002 and 2004]	6.09	5.52	0.91	0.83	0.86	0.78
Ultrafine TiO ₂ (0.8 μm, 1.8 GSD; 48 m ² /g):						
Tran et al. [1999]	7.86	7.32	0.164	0.153	0.136	0.127
Cullen et al. [2002]	40.39	33.00	0.842	0.687	0.698	0.570
Bermudez et al. [2002 and 2004]	6.09	5.52	0.127	0.115	0.105	0.095

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NIOSH considered, regarding results in the table, that “a concentration of approximately 0.11 mg/m³ is appropriate as the starting point for developing recommended exposures to ultrafine TiO₂.”

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Since the rat BMDs were extrapolated to humans using a deposition/clearance model, NIOSH considered reasonable to assume that the animal-to-human toxicokinetic subfactor of 4 has already been accounted for; therefore, a total uncertainty factor of 25 (2.5 for animal-to-human toxicodynamics times ; 10 for interindividual variability) should be applied. This results in estimated exposure concentrations designed to prevent pulmonary inflammation of 0.004 mg/m³ for ultrafine TiO₂.

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Lung tumors

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- **Key studies:** NIOSH used dose-response data from chronic inhalation studies in rats exposed to TiO₂ to estimate working lifetime exposures and lung cancer risks in humans. These studies include fine (pigment-grade) rutile TiO₂ (Lee et al. 1985; Muhle et al. 1991) and ultrafine anatase TiO₂ (Heinrich et al. 1995).
- **Critical effect:** risk estimates for TiO₂-induced lung tumors are based on the combined male and female rat lung tumors, excluding the squamous cell keratinizing cystic tumors. The estimated particle surface area dose associated with a 1/1000 excess risk of lung tumors was chosen for the derivation of critical dose.

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The critical doses were then multiplied by 1.5 in order to normalize them to rats of the size used as a reference for lung surface area, as these were estimated to have lung weights of approximately 1.5 grams, based on the animal's body weights. The critical doses were then extrapolated to humans based on the ratio of rat lung to human lung surface areas, which were assumed to be 0.41 m² for Fischer 344 rats, 0.4 m² for Sprague-Dawley rats, and 102.2 m² for humans (Mercer et al. 1994). These critical particle surface area doses were then converted back to particle mass dose for humans.

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The multiple-path particle dosimetry model (MPPD2) human lung dosimetry model (CIIT and RIVM 2002) was used to estimate the working lifetime airborne mass concentrations associated with the critical doses in human lungs.

Table 4–7. Model average estimates[†] of mean airborne mass concentrations of fine and ultrafine TiO₂ in humans and related human lung burdens (TiO₂* surface area dose) associated with various levels of excess risk of lung cancer after a 45-year working lifetime

Particle size and lifetime added risk estimated from rat dose-response data for lung tumors [‡]	Critical dose in human lungs [‡]				Mean airborne exposure [§]	
	Particle surface area (m ² /lung)		Particle mass (g/lung)		MPPD (ICRP) lung model (mg/m ³)	
	MLE	95% LCL	MLE	95% LCL	MLE	95% LCL
<i>Fine TiO₂ (2.1 μm, 2.2 GSD; 6.68 m²/g):</i>						
1 in 500	114.2	24.9	17.1	3.7	16.1	3.5
1 in 1000	93.5	17.0	14.0	2.5	13.2	2.4^{††}
1 in 2000	76.3	11.1	11.4	1.7	10.8	1.6
1 in 5000	57.5	6.2	8.6	0.9	8.1	0.9
1 in 10,000	46.4	3.8	6.9	0.6	6.5	0.5
1 in 100,000	21.4	0.5	3.2	0.1	3.0	0.1
<i>Ultrafine TiO₂ (0.8 μm, 1.8 GSD; 48 m²/g)**:</i>						
1 in 500	114.2	24.9	2.38	0.52	1.97	0.43
1 in 1000	93.5	17.0	1.95	0.35	1.62	0.29^{††}
1 in 2000	76.3	11.1	1.59	0.23	1.32	0.19
1 in 5000	57.5	6.2	1.20	0.13	0.99	0.11
1 in 10,000	46.4	3.8	0.97	0.08	0.80	0.07
1 in 100,000	21.4	0.5	0.45	0.01	0.37	0.01

*Abbreviations: MA = model average; BMD = benchmark dose; GSD = geometric standard deviation, LCL = lower confidence limit; MLE = maximum likelihood estimate; TiO₂ = titanium dioxide, MPPD = multiple-path particle dosimetry [CIIT and RIVM 2002] model.

[†]Model averaging combined estimates from the multistage, Weibull, and log-probit models [Wheeler and Bailer 2007].

[‡]MLE and 95% LCL were determined in rats (Table 4–5) and extrapolated to humans based on species differences in lung surface area, as described in Section 4.2.3.

[§]Mean concentration estimates were derived from the CIIT and RIVM [2002] lung model.

[¶]Without keratinizing cystic lesions.

**Mass median aerodynamic diameter (MMAD). Agglomerated particle size for ultrafine TiO₂ was used in the deposition model [CIIT and RIVM 2002]. Specific surface area was used to convert from particle surface area dose to mass dose; thus airborne particles with different specific surface areas would result in different mass concentration estimates from those shown here.

^{††}The exposure levels shown in boldface are the 95% LCL estimates of the concentrations of fine and ultrafine TiO₂ considered appropriate for establishment of a REL. The ultrafine exposure level of 0.29 mg/m³ was rounded to 0.3 for the REL.

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1312 The concentrations shown in bold for fine and ultrafine TiO₂ represent 1 per 1000 risk levels, which
1313 NIOSH has used as the basis for establishing RELs. The REL for ultrafine TiO₂ was rounded from
1314 0.29 mg/m³ to 0.3.

1315

1316 NIOSH discussed the relevance of the two values derived.

1317 “occupational exposure concentrations designed to prevent pulmonary inflammation, and thus
1318 prevent the development of secondary toxicity (including lung tumors), are 0.04 mg/m³ for fine TiO₂
1319 and 0.004 mg/m³ for ultrafine TiO₂. In comparison, modeling of the dose-response relationship for
1320 lung tumors indicates that occupational exposure concentrations of 2.4 mg/m³ for fine TiO₂ and 0.3

1321 mg/m³ for ultrafine TiO₂ would be sufficient to reduce the risk of lung tumors to a 1/1000 lifetime
1322 excess risk level. The discrepancy between the occupational exposure concentrations estimated
1323 from modeling either pulmonary inflammation or lung tumors raises serious questions concerning
1324 the optimal basis for a TiO₂ REL. However, it must be acknowledged that the two sets of possible
1325 RELs are not based on entirely comparable endpoints. The pulmonary inflammation-based exposure
1326 concentrations are expected to entirely prevent the development of toxicity secondary to pulmonary
1327 inflammation, resulting in zero excess risk of lung tumors due to exposure to TiO₂. In contrast, the
1328 lung tumor-based exposure concentrations are designed to allow a small, but nonzero, excess risk
1329 of lung tumors due to occupational exposure to TiO₂.

1330 As discussed in Section 3.4.1, particle-induced pulmonary inflammation may act as a precursor for
1331 lung tumor development; however, pulmonary inflammation itself is not a specific biomarker for lung
1332 cancer. As noted in Section 3.5.2.2, the precise level of sustained inflammation necessary to initiate
1333 a tumorigenic response is currently unknown. It is possible that the 4% PMN response used in this
1334 analysis as the benchmark response level for pulmonary inflammation is overly protective and that
1335 a somewhat greater inflammatory response is required for tumor initiation. It is also possible that the
1336 25-fold uncertainty factor applied to the critical dose estimate for pulmonary inflammation may be
1337 overly conservative, since pulmonary inflammation is an early event in the sequence of events
1338 leading to lung tumors. However, NIOSH has not previously used early events or secondary toxicity
1339 as a rationale for applying smaller than normal uncertainty factors. Given that in this case the primary
1340 objective of preventing pulmonary inflammation is to prevent the development of lung tumors, and
1341 given that lung tumors can be adequately controlled by exposures many-fold higher than the
1342 inflammation-based exposure concentrations, NIOSH has concluded that it is appropriate to base
1343 RELs for TiO₂ on lung tumors rather than pulmonary inflammation. However, NIOSH notes that
1344 extremely low-level exposures to TiO₂—i.e., at concentrations less than the pulmonary inflammation-
1345 based RELs—may pose no excess risk of lung tumors.”

1346 2.2.2 Scaffold project (Scaffold, 2014)

1347 The EU-funded SCAFFOLD (Innovative strategies, methods and tools for occupational risks
1348 management of manufactured nanomaterials (MNMs) in the construction industry) project sought to
1349 help manage occupational exposure to MNMs by developing, testing, validating and disseminating
1350 strategies, methods and software tools. In the framework of this project, occupational exposure limits
1351 were formulated for several nanomaterials, including titanium dioxide.

1352 The critical effects are related to pulmonary inflammation, which has been observed in animal
1353 inhalation studies at various exposure durations. The study of Bermudez et al. (2004) was identified
1354 as the key study for pulmonary effects after repeated dose exposure. In rats responses were
1355 observed in animals exposed to 2 mg/m³. Based on this, a NOAEC of 0.5 mg/m³ was identified.

1356 The limit value was calculated as follows: First, the starting point, i.e. NOAEC, was corrected in order
1357 to consider differences in exposure time (6 h versus 8 h / day and in breathing volume for rest versus
1358 light work) (ECHA 2012):

1359 Corrected starting point = 0.5 mg/m³ x (6 h/day / 8 h/day) x (6.7 m³ / 10 m³) = 0.251 mg/m³

1360 In order to cover the potential differences related to the sensitivity of different individuals, it was
1361 decided to use the assessment factor of 2.5.

1362 By applying the above mentioned factor, the calculations for an OEL for TiO₂ are as follows:

1363 OEL = 0.251 mg/m³ / 2.5 = 0.1005 mg/m³ ≈ 0.1 mg/m³.

1364 3 Toxicokinetics and metabolism

1365

1366 As an introduction, it has to be noted that kinetics of TiO₂-NP after inhalation, as an inorganic particle,
1367 depends only on the extent of lung deposition and clearance. This section will therefore mainly deal
1368 with respiratory tract kinetics.

1369

1370 3.1 Lung kinetics

1371 Lung is the portal of entry for inhalation exposure to TiO₂-NP and many studies have focused on
1372 local pulmonary fate of TiO₂-NP.

1373 Oyabu et al. (2017) assessed the biopersistence of TiO₂-NP (spindle-shaped, 12x55 nm) in the lung
1374 after instillation or inhalation for 4 weeks. With the two conditions of exposure, the biological half-life
1375 was approximately 2 months. The authors suggest the biopersistence to be a good indicator of TiO₂-
1376 NP hazard, as a good correlation was found between biopersistence and effects observed. Similar
1377 retention half-times in the lung (≥ 60 days) were reported for TiO₂-NP (P25; anatase/rutile; 21 nm)
1378 after whole-body inhalation for 13 weeks in rats (Bermudez et al. 2004) or after 3 instillations at a 4-
1379 day interval (Relier et al. 2017). This biological half-life value was obtained at concentrations inducing
1380 lung inflammation but without generating an overload situation.

1381 Eydner et al. (2012) nose-only exposed rats to 10 mg/m³ TiO₂ P25, 6h/day for 21 consecutive days,
1382 with the aim to assess the Relative Deposition Index (RDI). Particle deposition took place mainly in
1383 alveolar macrophages and to a lesser extent in type-I pneumocytes and no particles were found in
1384 cell organelles such as mitochondria or nuclei.

1385 Shinohara et al. (2014) reported a dose-dependent accumulation following acute intratracheal
1386 exposure in rat and proposed a simple model to describe the clearance of TiO₂ P25 in lung. They
1387 concluded that the translocation is a slower process than the lung clearance and, in addition, lung
1388 clearance is more influenced by the dose, the higher the dose, the lower the elimination.

1389 Zhang et al. (2015) compared pulmonary TiO₂-NP (P25) microdistribution in rats administered
1390 intratracheally with one or multiple dose at the same total dosage. The results suggested that
1391 multiple-dose administrations do not offer more advantages over single-dose administration in the
1392 study of pulmonary NP microdistribution: there are no prominent differences in the pattern of the
1393 pulmonary microdistribution of TiO₂. However, the multiple-dose administration reduced variations
1394 in the TiO₂ content in each lung lobe (Zhang et al. 2016).

1395 3.2 Distribution to other organs

1396 It is generally recognized that an estimated 1% or less of TiO₂-NP deposited in the lungs translocates
1397 to systemic circulation and enters other organs. To investigate this postulate, a few recent studies
1398 investigated the translocation from lung and distribution of TiO₂-NP in the organism.

1399 Based on the detection of nanoparticles in granulocytes located inside a capillary, Eydner et al.
1400 (2012) suggested that distribution to other organs via the blood circulation is possible, although only
1401 to a minimal extent.

1402 Kreyling and colleagues analysed the tissue distribution of anatase TiO₂-NP following a single
1403 intratracheal instillation exposure (Kreyling, Holzwarth, Haberl, Kozempel, Wenk, et al. 2017,
1404 Kreyling, Holzwarth, Schleh, et al. 2017). They observed a translocation of TiO₂-NP across the air-
1405 blood barrier into the circulation, leading to small but persistent TiO₂-NP accumulation in almost all
1406 studied organs and tissues. The largest fraction of translocated TiO₂-NP was found in soft tissue
1407 followed by skeleton while the highest concentrations per organ weight were found in kidneys, liver
1408 and spleen. This resulted in a similar distribution pattern compared to the gavage exposure (Kreyling
1409 et al. 2017b) but very different from intravenous exposure (Kreyling, Holzwarth, Haberl, Kozempel,
1410 Hirn, et al. 2017). Moreover, the authors confirmed that the TiO₂-NP cleared from the lungs after
1411 instillation can be absorbed in the gastrointestinal tract.

1412 Another interesting study explored the distribution of TiO₂-NP (20 nm anatase) in rat tissues following
1413 a 6h nose only inhalation of 15 mg/m³ TiO₂-NP (Pujalte, Serventi, et al. 2017). The authors confirmed
1414 translocation of particles to blood and distribution in others tissues (liver, kidneys or pancreas). They
1415 also found detectable amount of TiO₂-NP in brain.

1416 Husain et al. (2015) demonstrated the presence of TiO₂-NP in liver and heart after acute instillation
1417 exposure to TiO₂ UV-Titan L181.

1418 Gate et al. (2017) focused on the differences between young and elderly rats exposed 6 h/day, 5
1419 days/week for 4 weeks by nose-only inhalation to 10 mg/m³ TiO₂ P25. They confirmed translocation
1420 to liver and spleen of TiO₂-NP but never found difference with control group for kidneys or brain.
1421 They observed that the amount recovered in spleen and liver was higher in old than in young adults.
1422 According to the same authors, the elimination from lung was slower in old rats.

1423

1424 3.3 Excretion

1425 Pujalte, Dieme, et al. (2017) showed that TiO₂-NP is mainly excreted in feces following inhalation
1426 compared to urine. The authors stated that these data combined with the observed time courses of
1427 TiO₂-NP in lung, blood and lymph nodes are compatible with a mucociliary clearance from the
1428 respiratory tract and ingestion of particles, as concluded by Kreyling et al. (2017c).

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1431

1432 4 Toxicity data

1433

1434 4.1 Acute toxicity

1435 4.1.1 Pulmonary effects

1436 The following acute toxicity studies focused on pulmonary effects. All studies reported pulmonary
1437 inflammation to various extent depending on the protocol used.

1438 Grassian and colleagues investigated the pulmonary effects of two different TiO₂-NP (5 nm anatase
1439 and 21 nm anatase/rutile) with a comparable protocol of exposure (about 0.7 and 7 mg/m³ by
1440 inhalation for 4 hours). Similar effects were reported with both forms at high concentration, including
1441 inflammation in the BALF without histopathological changes in the lung (Grassian, Adamcakova-
1442 Dodd, et al. 2007, Grassian, O'Shaughnessy P, et al. 2007).

1443 Macrophage-engulfed pigment-like components were reported in the lung after 6 hour-exposure to
1444 rutile TiO₂ (10x50 nm) at 4 mg/m³ by whole body or nose-only protocol, suggesting no difference
1445 between these two types of administrations (Oyabu et al. 2016).

1446 Noel et al. (2012) also showed that an acute (6 hours) inhalation of 5 nm TiO₂ (anatase) with two
1447 distinct agglomeration states, smaller or larger than 100 nm, induced mild pulmonary effects at 7
1448 mg/m³.

1449 In a study of Leppänen et al. (2011), mice were exposed by nose-only inhalation to anatase:brookite
1450 (3:1) 20 nm TiO₂ for 30 min to 0, 8, 20 and 30 mg/m³. The main effect was an airflow reduction,
1451 which occurred at each studied concentration. Thereafter, the same authors investigated respiratory
1452 effects in mice following 30 min exposure to nano silica-coated rutile TiO₂ (10 x 40 nm) at 0, 5, 10,
1453 20 and 30 mg/m³. The exposure induced first phase of pulmonary irritation (rapid and shallow
1454 breathing), starting at 10 mg/m³ exposure, but did not induce inflammation (Leppanen et al. 2015)

1455

1456 Numerous acute toxicity studies by intratracheal instillation are also available. Although not
1457 transposable quantitatively, as they are not representative of normal exposure (the upper respiratory
1458 tract is bypassed), they can bring additional information for hazard identification. Most of those
1459 studies showed similar pulmonary effects as studies by inhalation (Oberdörster et al. 2000, Renwick
1460 et al. 2004, Chen et al. 2006, Nemmar, Melghit, and Ali 2008, Nemmar et al. 2011, Liang et al. 2009,
1461 Sager and Castranova 2009, Cho et al. 2010, Roberts et al. 2011, Tang et al. 2011, Hurbankova et
1462 al. 2013, Husain et al. 2013, Husain et al. 2015, Lee et al. 2014, Choi et al. 2014, Oyabu et al. 2013,
1463 Yoshiura et al. 2015, Kobayashi et al. 2016, Wallin et al. 2017, Saber et al. 2013). In contrast, another
1464 study did not show any effect of anatase TiO₂-NP 7 nm at 0.5 mg/mL (0.2 mg/0.4 mL) (Horie et al.
1465 2012).

1466 Unfortunately, the doses used in instillation studies are difficult to compare with each other due to
1467 different metrics used by the authors and even more so with inhalation studies.

1468 4.1.2 Cardiovascular effects

1469 A series of publications from the same team studied the effect of TiO₂ P25 (anatase/rutile; 21 nm)
1470 exposure on microvascular function (Nurkiewicz et al. 2008, Nurkiewicz et al. 2009, LeBlanc et al.
1471 2009, LeBlanc et al. 2010, Knuckles et al. 2012, Stapleton, McBride, et al. 2015). Animals were
1472 exposed to different time-concentration combinations in the first study chronologically and then to 6
1473 mg/m³ for 4 hours in the other ones.

1474 Those studies showed that:

- 1475 • inhalation of P25 caused an impaired vasodilatation capacity in the systemic microcirculation;
- 1476 • this reduced vasoreactivity was observed after co-exposure to ACh (activation of endothelial
1477 NO synthase and prostaglandin production), A23187 (interaction with endothelial cells to
1478 increase intracellular Ca²⁺ concentration and subsequently stimulation of nitric oxide
1479 production) or an active hyperemia (through the stimulation of muscular contraction), while
1480 smooth muscle responsiveness to NO remained unaltered (co-exposure to sodium
1481 nitroprusside (SNP), an NO “donor”, causes no differences between control and exposed
1482 group);
- 1483 • those changes are consistent with an endothelial dysfunction (microvascular NO
1484 bioavailability compromised after nanoparticle exposure);
- 1485 • COX inhibition significantly decreased arteriolar-induced dilation in exposed animals ;
- 1486 • this observation is consistent with a COX mediated compensation for the reduced NO
1487 bioavailability;
- 1488 • exposure to P25 increased ROS (reactive oxygen species) and RNS (reactive nitrogen
1489 species) production in the microvascular wall;
- 1490 • the impairment of vasodilation was restored by incubation with ROS scavengers.

1491

1492 These studies show that acute exposure to P25 induces vascular dysfunction via ROS generation,
1493 which leads to reduce NO bioavailability and ultimately impairs vasodilation. These results suggest
1494 that COX pathways would mediate a compensation mechanism for the reduced NO bioavailability.
1495 Moreover, considering the observations described above, it can be estimated that the cardiovascular
1496 effects observed are concomitant with a weak pulmonary inflammatory effect.

1497 The effects on cardiovascular function after acute exposure were also observed in other studies
1498 performed by instillation:

1499 In the study of Savi et al. (2014), male rats were exposed to TiO₂-NP (25-35 nm; anatase/rutile) at a
1500 single dose of 2 mg/kg by instillation. The authors observed that TiO₂-NP enhanced the susceptibility
1501 to cardiac arrhythmias, via shortening of repolarization time and increase of cardiac excitability. The
1502 authors also demonstrated the presence of TiO₂-NP into cardiomyocytes via Transmission Electron
1503 Microscopy (TEM). In the study of Saber et al. (2013), female mice were exposed intra-tracheally
1504 once to 18, 54 and 162 µg of TiO₂-NP (UV Titan L181, rutile surface coated, 17 nm). Exposure to

1505 UV Titan L181 increased pulmonary Serum Amyloid A (SAA, a risk factor for cardiovascular disease
1506 in mice) mRNA expression in a time- and dose-dependent manner. The strongest response was
1507 seen at the early time points (400-fold increase in Saa3 mRNA expression in lung at day 1 at the
1508 highest dose). Saa3 expression remained significantly increased 28 days after exposure in all mice
1509 exposed to the highest dose. According to the authors, this result indicates a long-lasting induction
1510 of acute phase response.

1511

1512

1513 4.2 Repeated dose toxicity

1514 4.2.1 Human data

1515

1516 Nine human studies have been identified on toxicological effects following inhalation exposure of
1517 TiO₂ in workers. Among them, three studies dealt with Chinese workers (Zhen et al. 2012, Zhao et
1518 al. 2018, Ichihara et al. 2016) and 5 investigated a sample of workers in the Czech Republic (Pelclova
1519 et al. 2017, Pelclova, Zdimal, Kacer, Vlckova, et al. 2016, Pelclova, Zdimal, Kacer, Fenclova, et al.
1520 2016, Pelclova, Zdimal, Fenclova, et al. 2016, Pelclova et al. 2015). All these studies have been
1521 considered inadequate, due to selection bias, classification bias for exposure to TiO₂ and
1522 confounding factors.

1523 The study by Zhen et al. (2012) focused on short-term cardiopulmonary effects after exposure to
1524 inhalable TiO₂ in an (unspecified) finished-product production workshop. Zhao et al. (2018), who
1525 belonged to the same team as Zhen et al., re-analysed short-term cardiopulmonary effects in a
1526 sample of workers in a nano-TiO₂ manufacturing plant using a cross-sectional design. Ichihara et al.
1527 (2016) undertook a pilot study, with a cross-sectional design, in a plant handling TiO₂ in Shanghai,
1528 China. The number of exposed workers included in these studies was between 7 and 83. Finally,
1529 the five publications by Pelclova and colleagues were part of the same research project, sub-divided
1530 into several studies depending on the type of effect studied and the analysis time. All of the studies
1531 had a cross-sectional design, but some were repeated, with differences in exposure measurement
1532 and biological sampling protocols. The authors distinguished between several sub-groups of workers
1533 considered as exposed, all from the same production plant for paints and pigments containing TiO₂
1534 and other compounds (iron oxide). The sizes of the sub-groups varied depending on the publication,
1535 except for researchers (n=4) and exposed office workers (n=22). The authors studied several types
1536 of effects including respiratory function with markers of oxidative stress and lipid peroxidation.

1537 On the whole, none of the nine studies considered enable a causal relationship to be established
1538 between exposure to nano- or micro-metric (both corresponding to the respirable fraction) size
1539 ranges of TiO₂ and the occurrence of biological or health effects in workers. These studies suggest
1540 possible effects on respiratory and cardiovascular function whose mechanisms may include
1541 oxidative stress reactions, inflammation and the regulation of the parasympathetic nervous system.
1542 However, none of them include dose response analyses based on the concentrations of TiO₂

1543 measured at the workstations or individually. The lack of a validated method for assessing individual
1544 exposure is a common limitation of all of the studies with on the one hand, the inability to compare
1545 nanometric TiO₂ concentrations with the background noise formed by other indoor air particles, and
1546 on the other hand, the inability to assess the internal dose or effective dose (TiO₂-NP deposited in
1547 the airways).

1548

1549 **4.2.2 Animal data**

1550 Table 3 presents the repeated studies conducted by inhalation, with several or single concentrations.

1551 The studies conducted by instillation route are discussed in the text below the table.

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Table 3 : Repeated toxicity studies by inhalation route

Method	Results	Remarks	Reference
Studies with several concentrations			
<p>13-week study by whole-body exposure</p> <p>Females B3C3F1/CrlBR mice, CDF(F344)/CrlBR rats, Lak:LVG(SYR)BR hamsters</p> <p>25/species/time point</p> <p>Uf-TiO₂ (P25, average primary particle size of 21 nm)</p> <p>0.5, 2.0, or 10 mg/m³</p> <p>Corresponding to actual concentrations: - mice: 0.54 ± 0.06, 2.2 ± 0.1 and 10.8 ± 1.0 mg/m³ - rats: 0.52 ± 0.03, 2.1 ± 0.1, and 10.5 ± 0.7 mg/m³ - hamsters: 0.53 ± 0.03, 2.1 ± 0.1, and 10.7 ± 0.6 mg/m³</p> <p>6 h/day, 5 days/week, for 13 weeks, whole body</p> <p>Additional recovery groups for post-exposure periods of 4, 13, 26, or 52 (49 for hamster) weeks in clean air.</p> <p>MMAD = 1.37 µm (1.29-1.44µm)</p> <p>Parameters: mortality, clinical observations, body weight, BALF, lung cell proliferation and lung histopathology</p>	<p>Mice: Treatment-related mortalities during exposure phase (4). Post-exposure: 4 deaths not treatment related. Reversible depression of BW gain in all groups. ↑ TiO₂ burden in lung and lymph nodes at 10 mg/m³: retention half-times in lung: 48, 40, and 319d at each concentration.</p> <ul style="list-style-type: none"> 0.5 and 2 mg/m³: Particles free, within alveolar macrophages and in alveolar septal regions. 10 mg/m³: ↑ total number of cells and total proteins (still significant at 52w post-exposure) and Lactate Dehydrogenase (LDH) (normal at 26w) in BALF. Reversible ↑ in terminal bronchiolar cell replication Aggregations of heavily particle laden macrophages in central lobar centriacinar sites, concentrating over time and moved to interstitial areas. Perivascular lymphoid proliferation. <p>Rats: Post-exposure: 7 deaths not treatment related. Reversible depression of BW gain in all groups. ↑ TiO₂ burdens in lung and lymph nodes (mid and high doses): retention half-times in lung: 63, 132, and 395d, at each concentration.</p> <ul style="list-style-type: none"> 0.5 mg/m³: Particles within alveolar macrophages and very minimal changes in the patterns of alveolar macrophage accumulation in lungs. 2.0 mg/m³: Particle laden macrophage accumulation, minimal hypertrophy and hyperplasia of type II alveolar epithelial cells. Significant ↑ in terminal bronchiolar cell and in alveolar cell replication (mid and high dose) reversible. 10 mg/m³: ↑ total number of cells (normal by 26w post-exposure), total protein (normal by 4w) and LDH (normal by 26w) in BALF. Metaplastic changes in the centriacinar region (bronchiolization of alveolar epithelium) associated with particle and particle-laden macrophage accumulation – not fully reversible at 52w. 	<p>NOAEC = 2.0 mg/m³ in mice NOAEC = 0.5 mg/m³ in rats NOAEC = 10 mg/m³ in hamsters</p> <p>No sonication performed before administration. Only females tested. Only examination of lung response. No full characterization of the tested material but P25 is a well-characterized form of TiO₂. No detailed results on histopathology.</p> <p>Reliability = 1¹⁴ Key study</p>	<p>Bermudez et al. (2004)</p>

¹⁴ Reliability was assessed via the software ToxRTool

	<p>Hamsters: ↑ morbidity and mortality (35 animals during postexposure), not treatment related BW loss at the end of the exposure (9–15%), slow recovery. ↑ TiO₂ lung burdens; retention half-times in lung: 33, 37, and 39d at each concentration. BALF: significant ↑ neutrophils at the end of exposure. Significant terminal bronchiolar cell replication at 10 mg/m³ (normal at 4w post-exposure). Alveolar and interstitial macrophages containing particles and occasional aggregation of particle-laden macrophages in high dose group. No pathology.</p>		
<p>Repeated-dose toxicity study by nose-only inhalation</p> <p>Male Wistar rats</p> <p>6 rats/time point/dose</p> <p>Uncoated TiO₂ with hydrophobic surface (14% rutile, 86% anatase). Average primary particle size : 25.1±8.2 nm (13-71 nm)</p> <p>2.0, 10 or 50 mg/m³</p> <p>Nose-only exposure 6h/day for 5 days followed by a recovery period of 3 or 16 days</p> <p>Parameters: lung burden analysis, BALF, cell mediators in BALF and serum, haematology and serum troponin I, histopathology (lung, nasal cavity and larynx), cell proliferation and apoptosis</p>	<p>No significant effect on BW. Lung weights ↑ immediately after exposure at 50 mg/m³. Concentration related ↑ in total cell counts (↑ numbers of PMN (Polymorphonuclear Neutrophils)), total protein and enzyme activities. After exposure:</p> <ul style="list-style-type: none"> • 10 mg/m³: ↑ PMN counts and ↑ γGT activity, • 50 mg/m³: ↑ total protein content and activities of all 4 enzymes examined. <p>3d post-exposure, minimal effects on total protein and some enzyme activities at 2 mg/m³: most prominent changes. 16d post-exposure most of these parameters returned to control level. Immediately after exposure:</p> <ul style="list-style-type: none"> • 10 mg/m³: ↑ MCP-1, MCP-3, M-CSF, MDC, myeloperoxidase MIP-2, and osteopontin • 50 mg/m³: same parameters + clusterin and haptoglobin. <p>3d post-exposure:</p> <ul style="list-style-type: none"> • 2 mg/m³: ↓ clusterin and haptoglobin. • Except osteopontin, all mediators ↑ at 10 and 50 mg/m³. <p>No significant changes in haematological parameters in all groups. No evidence for any heart muscle damage. Minimal and minimal to mild diffuse alveolar infiltration with histiocytes at 10 and 50 mg/m³. Hypertrophy/hyperplasia of bronchioles and bronchi at 50 mg/m³. ↑ labelling indices in large/medium bronchi and terminal bronchioles in all groups after the end of exposure.</p>	<p>LOAEC = 2 mg/m³</p> <p>Probably TiO₂ P25 but not specifically named in the publication. Only males. Too high concentrations tested as no NOAEC was identified</p> <p>Reliability = 2 Supportive study</p>	<p>Ma-Hock et al. (2009)</p>
<p>Repeated-dose toxicity study by nose-only exposure</p> <p>Male Wistar rats (8/group)</p>	<p>No effects observed at 0.5 mg/m³</p> <p>At 2 mg/m³ and 10 mg/m³:</p>	<p>LOAEC = 2 mg/m³ NOAEC = 0.5 mg/m³</p> <p>Only males tested.</p>	<p>Landsiedel et al. (2014)</p>

<p>nano-TiO₂ (T-Lite SF, 15x50 nm) rutile with minimal anatase, coated with dimethicone/methicone copolymer</p> <p>Concentration: 0.5, 2 and 10 mg/m³ mg/m³</p> <p>Exposure: 6 h/day for 5 days, and 3 week post-exposure for the group exposed to 10 mg/m³</p> <p>Parameters: measurement of cells and marker of inflammation in the BALF, and lung histopathology</p>	<ul style="list-style-type: none"> • concentration-dependent ↑ in PMN and monocytes in the BALF • ↑ in LDH and Alkaline Phosphatase (ALP) release <p>At 10 mg/m³: numerous pigment-loaded alveolar macrophages within the alveoli and slight diffuse histiocytosis not fully reversible after 3w of recovery.</p>	<p>Good characterization of TiO₂-NP and exposure</p> <p>Reliability = 1</p> <p>Supportive study: only 5 days of exposure</p>	
<p>Repeated-dose toxicity study by nose-only inhalation</p> <p>Five-week-old A/J Jms Slc mice</p> <p>10 mice/time point/dose</p> <p>Average primary particle size : 19.3±5.4 nm</p> <p>2.5, 5, 10 mg/m³</p> <p>whole body, 4 weeks (5d/w, 6h/d)</p> <p>Protocol according to OECD 412 (2009) guideline</p> <p>Parameters assessed: Biochemical analysis of serum, Whole blood analysis, Haematoxylin & eosin staining and immunofluorescence (IF) assay, Western blot analysis, lung histology</p>	<p>No adverse effects on growth or food intake</p> <p>Significantly higher levels of ALT, AST, blood urea nitrogen (BUN), and triglycerides (TG) in exposed groups. Levels of MCV, RDW, LYP, and LY significantly higher in TiO₂-inhaled blood samples.</p> <ul style="list-style-type: none"> • 2.5 mg/m³: hyperplasia and haemorrhage. • 5 mg/m³: hyperaemia, bronchial atelectasis, and brown particle-laden alveolar macrophages. • 10 mg/m³: bronchial atelectasis and multifocal lymphoid tissue hyperplasia. <p>Dose-related ↑ expressions of CD31 and PCNA.</p> <p>At 5 and 10 mg/m³, dose dependent ↑ of phospho-p38, NF-kB, and VCAM-1.</p> <p>Dose-dependent ER swelling and mitochondrial disruption in exposed lungs.</p> <p>Dose dependent ↑ expression levels of proteins Grp78/Bip, CHOP, inositol-requiring enzyme 1 alpha (IRE-1a), LC3, p62, and Beclin 1 in exposed mouse lungs.</p> <p>Autophagosomes in the lungs.</p>	<p>LOAEC = 2.5 mg/m³</p> <p>No information on crystallinity of nano-TiO₂ used.</p> <p>Too high concentrations tested as no NOAEC was identified</p> <p>This study has to be disregarded due to the lack of sufficient characterization of the tested material.</p> <p>Even if it is stated that the study was performed according to OECD 412 guideline, only blood, serum and protein analysis, IF and lung histology were evaluated which is not in line with the guideline.</p> <p>Reliability = 3</p> <p>Disregarded study</p>	<p>Yu et al. (2015)</p>
<p>Repeated-dose toxicity study by whole-body inhalation</p> <p>Male Fisher rats (10/group/time point)</p> <p>TiO₂ (MT-150AW); spindle-shaped; 12x55 nm; average agglomerated particle size:</p>	<p>Biological half-time were 2.0 months for the low tested concentration and 1.8 months for the high tested concentration.</p> <p>Nanoparticles were phagocytized by macrophages, and each particle seemed to exist individually inside the macrophage. Cells with TiO₂ particles were almost normal.</p>	<p>NOAEC = 1.84 mg/m³</p> <p>The aim of this study was to determine whether biopersistence is a useful indicator for evaluating the toxicity of nanoparticles.</p>	<p>Oyabu et al. (2017)</p>

<p>44.9 nm; purity = 99.5%; surface area = 111 m²/g</p> <p>Concentration: 0.50 ± 0.26 and 1.84 ± 0.74 mg/m³</p> <p>Exposure: 4 weeks (6 h/day, 5 days/week); sacrifice after 3 days, 1 or 3 month post-exposure</p> <p>Measurement of TiO₂ amount in the whole lung and BALF; observation of cells in the BALF, lung histopathology (only at 3 days after exposure for the highest concentration)</p>	<p>Some alveolar macrophages with a pigment-like material deposition were observed in the alveoli at 3 days after exposure.</p>	<p>Therefore, there is only limited information on the toxicity effects reported.</p> <p>Only males tested.</p> <p>No information on crystallinity in this publication but information available from Morimoto et al., 2016 (rutile)</p> <p>In this study, groups of rats exposed by instillation to 0.2 mg, 0.36 mg or 1 mg were also included, showing similar results.</p> <p>Reliability = 2 Supportive study</p>	
Studies with one concentration			
<p>Repeated-dose toxicity study by whole body inhalation male C57Bl/6 mice (6/group)</p> <p>TiO₂ anatase, 2-5 nm, BET = 219 +/-3 m²/g</p> <p>8.88 ±1.98 mg/m³, 4h/day for 10 days, sacrifice after last dose and after week 1, 2, 3 post-exposure</p> <p>Parameters: BALF (enumeration of cells, LDH, cytokines) and lung histopathology</p>	<p>Cumulative inhaled TiO₂ dose was 154 µg per mouse. Number of alveolar macrophages elevated in the groups of animals necropsied at weeks 0, 1, and 2 postexposure but not in mice necropsied at week 3 post-exposure. No other respiratory effect.</p>	<p>Only males treated.</p>	<p>Grassian, O'Shaughnessy P, et al. (2007) Grassian et al. (2007a)</p>

<p>Repeated-dose toxicity study by nose-only inhalation</p> <p>Female Wistar rats</p> <p>TiO₂ P25</p> <p>10 mg/m³</p> <p>6h/day 21 consecutive days, followed by recovery periods of 3, 28 or 90 days</p> <p>Parameters: lung histopathology, haematology, BALF, electron microscopy of lungs, quantification of lung septum components and relative deposition index</p>	<p>In few lungs, multifocal, acute alveolar emphysema, accentuated in caudal and marginal lung parts observed.</p> <p>Moderate alveolar infiltration with particle-laden macrophages.</p> <p>Few particle-laden macrophages intraluminally and subepithelially in bronchi and bronchioles.</p> <p>Rare particle agglomerates in bronchiolar epithelium, in type-I pneumocytes, and as free particles in alveoli. Minimal interstitial infiltration with mononuclear cells and minimal alveolar infiltration with neutrophilic granulocytes. Minimal bronchiolo-alveolar hyperplasia in few animals.</p> <p>3d recovery: no statistically significant changes evident in haematology. ↓ activity of β-glucuronidase. Randomly distributed, multifocal, white foci of 0.5–2 mm.</p> <p>28d recovery: WBC and lymphocyte counts significantly ↓</p> <p>Alterations in haematology parameters similar after a 90-day recovery period, with ↓ WBC counts, lymphocyte counts and number of segmented neutrophils. No significant changes in RBC count.</p>		<p>Eydner et al. (2012)</p>
<p>Repeated-dose toxicity study by nose-only inhalation</p> <p>male Crl:WI (Han) Wistar rats (6-7 per time point)</p> <p>TiO₂-NP, anatase being the major crystal phase; spherical; wide range of sizes with a few particles up to 100 nm with some agglomerates</p> <p>Concentration: 0 and 11.39 ± 0.31 mg/m³</p> <p>Exposure: 2 weeks (6 h/day, 5 days/week) followed by recovery periods of 1, 7 or 15 days.</p> <p>Parameters: biochemistry in BALF and serum, liver, spleen and lung weights, histopathology (lung, nasal cavity)</p>	<p>No significant clinical sign induced. No significant changes in BW. No significant change of liver and lung weights. ↑ relative spleen weight.</p> <p>No effect on cytology and biochemical parameters.</p> <p>No observation of significant differences in levels of IL-4, IL-6, or IL-10 between control and treated groups on 1, 7, and 15d post-exposure</p> <p>Numerous brown pigmented macrophages in alveoli until 15d post-exposure. At 1d post-exposure, olfactory epithelium degeneration/regeneration with inflammatory cell infiltration in the nasal septum and ethmoid turbinate of the treated rats. Basal cell proliferation in the ethmoid turbinate at 7 day post-exposure. Lesions not observed at 15d post-exposure.</p>	<p>This study has to be disregarded due to the lack of sufficient characterization of the tested material.</p>	<p>Kwon et al. (2012)</p>
<p>Repeated-dose toxicity study by nose-only inhalation</p> <p>7 week-old male Crl:WI (Han) Wistar rats</p>	<p>Ti only detectable in lung and mediastinal lymph nodes of exposed animals.</p> <p>TiO₂ mainly in alveolar macrophages. Number of alveolar macrophages moderately ↑ and few numbers of neutrophils within alveolar space.</p>	<p>Relevance of the results questionable due to too high concentration used.</p>	<p>van Ravenzwaay et al. (2009)</p>

<p>Anatase/rutile (70/30) TiO₂ particles were in the size range 20–30nm</p> <p>Concentration : Target : 100 mg/m³ (measured : 88 mg/m³); 6 h/day, 5 days/week followed by 14 days of recovery</p> <p>Parameters: histopathology of the respiratory tract, electron microscopy and BALF</p>	<p>Particles mainly located extracellularly in lumen of alveoli and bronchi + in cytoplasm of alveolar macrophages. TiO₂ found in lung mostly agglomerates of about the same size as in atmosphere; no signs of disagglomeration.</p> <p>Significant ↑ in total cell count and PMN, slightly ↑ lymphocytes and monocytes in lavage fluid. Significantly ↑ of total protein and activities of LDH, ALP, γGT and N-acetyl-glucosaminidase. ↑ of BALF parameters partly reversible.</p> <p>Exposure resulted in >30% ↑ in lung weight.</p> <p>Diffuse histiocytosis and mild neutrophilic inflammation. Hyperplasia in Mediastinal lymph nodes. Declined inflammatory response after recovery, only focal infiltrates of alveolar macrophages, still containing particles in cytoplasm. Lung weight returned to control levels.</p>		
<p>Repeated-dose toxicity study by whole-body inhalation</p> <p>Male Kunming mice</p> <p>15/animals/group</p> <p>Anatase TiO₂, 20 nm</p> <p>6.34 +/- 0.22 mg/m³</p> <p>Every day for 3 weeks</p> <p>Parameters: distribution (brain, lung, liver, kidney, spleen), BALF and brain homogenate extract, differential blood count, prothrombin time and blood biochemical indexes, pathological examination of lungs, brains, livers and kidneys</p>	<p>TiO₂-NP mainly accumulated in the lungs. Concentration in liver blood and urine also increased.</p> <p>Significant ↑ of H₂O₂ and MDA concentrations in brain homogenate extracts observed.</p> <p>↓ in WBC count and percentage of lymphocytes and ↑ in percentage of neutrophilic granulocytes, PLT and reticulocytes count.</p> <p>Significant ↑ in ALT and AST observed.</p> <p>No obvious pathological lesions in the lung, brain, liver or kidneys.</p>	<p>Results not well detailed and almost not discussed.</p>	<p>Yin et al. (2014)</p>
<p>Repeated-dose toxicity study by whole-body inhalation</p> <p>Female C57BL/6BomTac mice</p> <p>17 animals: 9 controls and 8 exposed</p> <p>UV-titan L181</p> <p>42 mg/m³</p>	<p>BALF: ↑ in the percentage of neutrophils;</p> <p>Transcriptomic analysis of the lungs: gene inductions for inflammation (cytokines and receptors), oxidative stress, chemotacticism, complement; modulation of a few miRNAs; Transcriptomic analysis of the liver: no significant changes</p>	<p>Relevance of the results questionable due to too high concentration used.</p>	<p>Halappanavar et al. (2011)</p>

<p>Exposure: 1h/d for 11 days</p> <p>Parameters: BALF, Gene Expression Analysis, RT-PCR, Immunoassay</p>			
<p>Repeated-dose toxicity study by whole-body inhalation</p> <p>Outbred Crl:OF1 male mice</p> <p>4-6/animals/group</p> <p>anatase + brookite (3:1)TiO₂, 20 nm</p> <p>30 mg/m³</p> <p>1 h/day, 4 days/week for 4 weeks</p> <p>Parameters: respiratory rate, time of inspiration, time of expiration, time of pause after expiration, time of braking after inspiration, tidal volume, and airflow at midpoint of expiration</p>	<p>Airflow limitation stronger along the exposure period, Sensory irritation fairly minor, and observed also in the control group with the same intensity.</p> <p>Pulmonary irritation observed both in the exposure and control groups. The highest "time of pause" values ↑ along with the exposure days in the exposure group, whereas in the control group, such trend not observed.</p>	<p>Relevance of the results questionable due to high concentration used.</p>	<p>Leppänen et al. (2011)</p>
<p>Repeated-dose toxicity study by whole-body inhalation</p> <p>female BALB/c/Sca mice</p> <p>8/animals/group</p> <p>Rutile Si-coated TiO₂, 10x40 nm</p> <p>30 mg/m³</p> <p>1 h/day, 4 days/week for 4 weeks on days 1–4, 8–10, 12, 15–18 and 22–25</p> <p>Parameters: BALF, pathological examination of lungs, immunohistochemical staining</p>	<p>Pulmonary irritation, stronger during the first days of the exposures (days 1–4), and after, the effect was not as intense.</p> <p>Airflow limitation in the conducting airways.</p> <p>Inflammation in the airways: infiltration of inflammatory cells in peribronchial and perivascular areas.</p>	<p>Relevance of the results questionable due to high concentration used.</p>	<p>Leppanen et al. (2015)</p>

4.2.2.1 Pulmonary effects

Four reliable studies (reliability 1 or 2) by inhalation with several concentrations are available on TiO₂-NP and are described and discussed below. These studies mainly focus on pulmonary effect without considering other effects. The studies by van Ravenzwaay et al. (2009), Kwon et al. (2012), and Yin et al. (2015) reported in the table above are not described in the text as they have been disregarded.

In the study performed by Bermudez et al. (2004), female CDF(F344)/CrIBR rats, B3C3F1/CrIBR mice and Lak:LVG(SYR)BR hamsters were treated with target aerosol concentrations of 0.5, 2 or 10 mg/m³ of TiO₂-NP (P25, average primary particle size of 21 nm) for 13 weeks. Groups of 25 animals for each species and time point were used. Following the exposure period, animals were held for recovery periods of 4, 13, 26 or 52 weeks (49 weeks for the nano-TiO₂-exposed hamsters). At each time point, burdens in the lung and lymph nodes and selected lung responses were examined. The responses studied were chosen to assess a variety of pulmonary parameters, including inflammation, cytotoxicity, lung cell proliferation and histopathological alterations.

Particle size analysis and chamber concentrations of P25 aerosol are given in table 4. It can be noted that the aerosol generated was made up of particle aggregates.

Table 4: Summary of exposure conditions in Bermudez et al. (2004)

Species	Chamber concentrations (mg/m ³)	Mass median aerodynamic diameter (µm)
Hamster	0.54 ± 0.06 2.2 ± 0.1 10.8 ± 1.0	1.29 ± 0.30
Mouse	0.52 ± 0.03 2.1 ± 0.1 10.5 ± 0.7	1.45 ± 0.49
Rat	0.53 ± 0.03 2.1 ± 0.1 10.7 ± 0.6	1.44 ± 0.57

Treatment-related deaths were noted in 4 mice during the exposure phase. During the post-exposure phase, unscheduled mortalities, distributed over the different treatment groups, were reported in all species. Hamsters presented the greatest morbidity/mortality (35 animals), presumably due to severe chronic renal disease.

Following the end of the exposure period, a decrease in body weight was noted in all groups and all species. A more marked body weight loss was noted in hamsters (9-15%). Recovery occurred over

27 the next three to four weeks in mice and rats but was slower in hamsters, with recovery within
28 approximately 6 weeks.

29 Clear species differences in pulmonary clearance and lesions were observed, rats being the most
30 sensitive.

31 Rats and mice exhibited equivalent TiO₂ lung burdens whereas lung burdens in hamsters were
32 approximately 2 to 5 fold lower after 13 weeks of exposure. At the end of the recovery period, rats
33 of the high-dose group retained approximately 57% of the initial burden compared to approximately
34 46% for mice and approximately 3% for hamsters. The calculated particle retention half-times for the
35 three dose levels were 63, 132 and 395 days in rats, 48, 40 and 319 days in mice and 33, 37 and
36 39 days in hamsters. Therefore, under the conditions of this study, hamsters had better ability to
37 clear TiO₂ nanoparticles than similarly exposed mice and rats.

38 Inflammation was noted in rats and mice at 10 mg/m³, as evidenced by increases in macrophage
39 and neutrophil numbers and in soluble indices of inflammation (LDH and protein) in BALF.

40 Significant terminal bronchiolar cell replication was observed at the end of the exposure period in
41 mice and hamsters of the high-dose group and in rats of the mid- and high-dose groups. The indices
42 returned to control levels at 4 weeks post-exposure. Alveolar cell replication was significantly
43 increased at the end of the exposure in rats of the mid- and high-dose groups; and returned to control
44 values by 4 weeks and 26 weeks in the mid- and the high-dose groups, respectively. In mice, a
45 transient increase in alveolar cell replication was only noted at 13 and 26 weeks post-exposure.
46 Hamster mitotic indices remained equivalent to controls throughout the study.

47 The histopathological evaluation showed that the pulmonary lesions were the most severe in rats
48 compared to mice and hamsters. Only appearance of particles within alveolar macrophages and
49 very minimal changes in the patterns of alveolar macrophage accumulation in the lung were noted
50 in the rats exposed to the low concentration. At the mid- and high concentrations, epithelial and
51 fibroproliferative lesions, which were progressive even following cessation of particle exposure and
52 diminution of pulmonary inflammation, were reported. These effects consisted of alveolar
53 hypertrophy and hyperplasia of type II epithelial cells surrounding aggregations of particle-laden
54 macrophages of minimal to mild severity, which became more severe at the highest concentration
55 of 10 mg/m³. Alveolar metaplasia (bronchiolization) and septal fibrosis were also noted in rats of the
56 high dose group by 52 weeks post-exposure. In contrast, no epithelial, metaplastic or
57 fibroproliferative changes were observed in mice and hamsters. In mice, the findings were limited to
58 the presence of particles free and within alveolar macrophages and in alveolar septal regions at the
59 low and middle concentrations. Minor epithelial changes primarily consisted of aggregations of
60 heavily particle-laden macrophages concentrated in central lobar centriacinar sites, with perivascular
61 lymphoid proliferation. Over the post-exposure period, there was evidence of concentration of these
62 cell aggregates and movement to interstitial areas, primarily around blood vessels and
63 peribronchiolar interstitium. No pathologies associated with treatment exposure were noted in
64 hamsters, except particle-laden alveolar and interstitial macrophages and occasional aggregation of
65 these particle-laden macrophages in the high concentration-exposed group.

66 The NOAEC for rats was established at 0.5 mg/m³, based on inflammation evidenced in the BALF
67 and pulmonary lesions (minimal hypertrophy and hyperplasia of type II alveolar epithelial cells) at 2
68 mg/m³. The NOAEC for mice was set at 2 mg/m³ based on inflammation evidenced in the BALF.
69 The NOAEC for hamster was set at the highest tested concentration of 10 mg/m³.

70 Some limitations associated with the testing protocol can be noted. First, the study was only
71 performed on females and the analysis only focused on lung response, with limited level of details
72 for the histopathological findings. Therefore, it cannot be completely ruled out that other findings
73 occurred at non-inflammatory concentrations in other organs. In addition, even if P25 is a well-known
74 form of TiO₂ (80%/20% anatase/rutile, 21 nm), the nanoparticles were not fully characterised in the
75 study. Finally, P25 was not dispersed (by sonication for example) before exposure in order to
76 generate the largest amount of free and/or aggregate particles.

77

78 Male Wistar rats were treated by head-nose inhalation with concentrations of 2, 10 or 50 mg/m³ of
79 TiO₂-NP (uncoated TiO₂ with hydrophobic surface, 14% rutile and 86% anatase forms, average
80 primary particle size: 25.1±8.2 nm) for 5 days (Ma-Hock et al. 2009). Groups of 6 animals for each
81 time point were used in the study. Following the exposure period, animals were held for recovery
82 periods of 3 or 16 days. Changes in BALF parameters (increased of total cells and neutrophils) were
83 observed, more pronounced 3 days after the end of the exposure than immediately after and
84 decreasing 16 days post exposure. There were also minimal and minimal to mild diffuse alveolar
85 infiltration with histiocytes at 10 mg/m³ and 50 mg/m³ and hypertrophy/hyperplasia of bronchioles
86 and bronchi at 50 mg/m³. In addition, the authors observed an increase in labelling indices in both
87 large/medium bronchi and terminal bronchioli in all treatment groups after the end of the exposure
88 period. Based on this last observation, they establish the LOAEC at the minimal concentration of 2
89 mg/m³. The results and conclusions of the current study are very consistent with those of Bermudez
90 et al. (2004), although the duration of exposure in this study is shorter.

91

92 Male Wistar rats (8 animals/group) were exposed for 6h/day on 5 consecutive days by head-nose
93 exposure to 0.5, 2 and 10 mg/m³ nano-TiO₂ (T-Lite SF, 15x50 nm, rutile with minimal anatase, coated
94 with dimethicone/methicone copolymer). An additional group exposed to 10 mg/m³ was held for a
95 recovery period of 3 weeks (Landsiedel et al. 2014). Exposure to T-Lite SF induced a concentration-
96 dependent increase in PMN and monocytes in the BALF at 2 mg/m³ and 10 mg/m³. The inflammatory
97 response was associated with an increase in LDH and ALP release at the same concentrations. The
98 BALF parameters remained elevated at the end of the recovery period for the group exposed to 10
99 mg/m³. In addition, numerous pigment-loaded alveolar macrophages were observed within the
100 alveoli along with slight diffuse histiocytosis at this concentration, not fully reversible after 3 weeks
101 of recovery. The authors report a NOAEC of 0.5 mg/m³ based on the pulmonary inflammation
102 evidenced in the BALF parameters. The concentration-dependent increase in pulmonary
103 inflammation observed in this study is consistent with the findings of Bermudez et al. (2004).

104

105 Male Fischer rats were exposed whole body to 0.50 ± 0.26 and 1.84 ± 0.74 mg/m³ of TiO₂ (MT-
106 150AW; rutile; spindle-shaped; 12 x 55 nm; purity = 99.5%) for 4 weeks, 6h/day, 5 days/week (Oyabu
107 et al. 2017). Following the exposure period, animals were held for recovery periods of 3 days, 1 or 3
108 months. The study primarily focused on biopersistence, but some information on lung histopathology
109 was also reported. After exposure to MT-150AW for 4 weeks, the biological half-time was estimated
110 to be approximately 2 months for both tested concentrations. Histopathologically, only alveolar
111 macrophages containing nanoparticles were noted at 3 days after exposure to 1.84 mg/m³. For
112 comparison, other groups of animals were exposed by instillation to 0.2, 0.36 or 1 mg of TiO₂. Similar
113 results in term of biological half-life and histopathological findings were reported. Based on these
114 results, the authors conclude to a comparatively good correlation between biological half-life and
115 total cell counts, PMN, LDH, cytokine-induced neutrophil chemoattractant 1 (CINC-1), and HO-1 in
116 the BALF.

117

118 Additional studies were performed by inhalation, but with only one concentration, which does not
119 allow to establish a dose-response relationship.

120 Male C57Bl/6 mice exposed to 5 nm anatase TiO₂ for 10 days at 8.88 ± 1.98 mg/m³ showed modest
121 but significant inflammatory response (number of alveolar macrophages elevated) among animals
122 necropsied at week 0, 1, 2 and 3 postexposure. Mice fully recovered from the inflammatory response
123 at week 3 post-exposure (Grassian, O'Shaughnessy P, et al. 2007)

124 Female Wistar rats were nose-only exposed to 10 mg/m³ P25 TiO₂, 6h/day for 21 consecutive days.
125 Following the exposure period, animals were held for recovery periods of 3, 28 or 90 days.
126 Toxicological investigations, limited to the description of lung toxicity, were not the primarily aim of
127 this study, which was to assess the RDI of TiO₂-NP as described in section 3.1. The authors reported,
128 in a few lungs, multifocal, acute alveolar emphysema, accentuated in caudal and marginal lung parts.
129 Minimal interstitial infiltration with mononuclear cells and minimal alveolar infiltration with neutrophilic
130 granulocytes were also observed. A few animals showed minimal bronchiolo-alveolar hyperplasia.
131 The leucopenia observed after 28 and 90 days recovery (reduced white blood cell and lymphocytes
132 count) could be explained by the infiltration of the lungs with these cells (Eydner et al. 2012). This
133 leucopenia was also observed after a daily whole body exposure for 3 weeks to 6 mg/m³ of anatase
134 TiO₂ (20 nm) (Yin et al. 2014)

135 Persistent inflammation was also reported in female mice when TiO₂-NP (UV Titan L181; rutile
136 surface coated, 17 nm, Chemical composition: Na₂O (0.6%), SiO₂ (12.01%), Al₂O₃ (4.58%), ZrO₂
137 (1.17%), TiO₂ (70.81%), polyalcohol adding to the remaining wt %) was administered whole-body 10
138 days during gestation at 42 mg/m³, 1 hour per day (Jackson et al. (2013) - see section 3.4.4 for
139 details). At the same dose and with similar exposure scenario (11 days, 1h/day), Halappanavar et
140 al. (2011) exposed mice by whole body inhalation and reported slight changes in pulmonary
141 inflammation biomarkers (induction of genes associated with inflammation and increased in
142 neutrophils proportion in BALF). However, the relevance of the results from these studies is
143 questionable considering the relatively high concentration used.

144 In the study of Leppänen et al. (2011), mice were exposed by whole body inhalation to
145 anatase:brookite (3:1) 20 nm TiO₂, 30 min, 4 days/weeks for 4 weeks to 0 and 30 mg/m³. In this
146 study, the authors observed airflow limitation, sensory irritation and pulmonary irritation. However,
147 sensory and pulmonary irritations were both reported in the exposure and control groups.

148 In the study of Leppänen et al. (2015), mice were exposed by whole body inhalation to silica-coated
149 rutile TiO₂ (10x40 nm) 30 min, 4 days/weeks for 4 weeks to 0 and 30 mg/m³. An inflammation was
150 observed in the murine airways as evidenced by the infiltration of inflammatory cells in peribronchial
151 and perivascular areas. This inflammatory response was not likely due to radical formation since
152 silica-coated nano TiO₂ did not significantly produce °OH radicals under UV radiation.

153 All the studies described above are in line and confirm the results from Bermudez et al. (2004),
154 showing inflammatory effects at doses above 0.5 mg/m³.

155 In line with acute toxicity, repeated dose toxicity studies are also available by intratracheal instillation,
156 with doses varying from 1.25 to 10 mg/kg. These studies cannot be used in risk assessments
157 because they are not representative of normal inhalation (the upper respiratory tract is bypassed)
158 and they do not provide external exposure concentrations. However, even if they are not
159 transposable quantitatively, they can provide additional useful information for hazard identification.
160 Overall, those studies showed similar effects on the pulmonary tract as studies by inhalation (Sun,
161 Tan, Ze, et al. 2012, Sun, Tan, Zhou, et al. 2012, Li et al. 2013, Hong et al. 2017).

162

163 4.2.2.2 Cardiovascular effects

164 Five studies identified from the literature evaluated cardiovascular effects of TiO₂-NP after repeated
165 exposure.

166 Pregnant Sprague-Dawley female were exposed to 10 mg/m³ P25 TiO₂ 5h/d during approximately 8
167 days. The exposure induced a significant uterine microvascular dysfunction, with an alteration of
168 reactivity after pharmacologic stimulation (ACh, NO donor...) or shear stress (Stapleton et al. (2013)
169 – see section 4.5 for details).

170 Saber et al. (2013) analysed mRNA response of SAA, after an inhalation exposure to UV-Titan L181
171 at 42 mg/m³ 10 days during pregnancy (gestation days 8-18) in mice. The authors showed an
172 increased in pulmonary Saa3 mRNA 5 days and 26–27 days after exposure compared to controls
173 exposed to filtered air, but those results have to be taken with reservation because of the high dose
174 used.

175 In the study performed by Yu et al. (2014), atherosclerosis occurred in mice after a daily exposure
176 for 9-month by instillation treatment (1.25; 2.5 and 5 mg/kg) with anatase 5 nm, with effects seen at
177 the low dose, increasing dose-dependently. The authors hypothesized that inhaled particles exert
178 cardiovascular effects indirectly through the passage of inflammatory mediators from the lung to the
179 systemic circulation, as the increased atherogenesis was concomitant with pulmonary inflammation
180 and oxidative stress.

181 ApoE male knockout mice were exposed to 5-10 nm anatase TiO₂ twice a week during 6 weeks by
182 instillation to 10, 50 or 100 µg/week. In accordance with studies described above, endothelial
183 dysfunction, evidenced by dose dependant decrease in NO concentration and eNOS activity, and
184 progression of atherosclerosis were observed. Lipid metabolism was also impacted with increased
185 serum total cholesterol and decreased high density lipoprotein cholesterol (HDL-C) (Chen et al.
186 2013).

187 In contrast to the above-mentioned studies (acute and repeated exposures) reporting effects of TiO₂-
188 NP on cardiovascular system with impaired vasodilation, there was no alteration of vasodilatory
189 function in aorta segment in mice exposed by instillation of UV-Titan L181, and even an increased
190 NO production in ex vivo experiment on human cells. This study also shows a modest increased
191 atherosclerotic plaque progression (Mikkelsen et al. 2011).

192

193 4.2.2.3 Immunotoxicity

194 Several studies have evaluated immune effects of TiO₂: five of them used intratracheal instillation at
195 doses up to 32 mg/kg for 4 or 5 weeks; six of them used an allergen sensitization and challenge to
196 ovalbumin (OVA) with various routes of exposure (aerosolized, inhalation, intranasal exposure,
197 nose-only application) at doses up to 15.7 mg/m³ or 200 µg/mouse for single or repeated exposures
198 (6 hours, 3 days, 4 weeks).

199 Rossi et al. (2010) observed that whole-body exposure to 10 ± 2 mg/m³ of TiO₂-NP (silica coated,
200 needle-like; 10 x 40 nm) for 4 weeks (3 times a week for 2 hours) induced Th1 type inflammation in
201 healthy mice, with an increase in neutrophil attracting chemokine CXCL5 mRNA expression and in
202 neutrophil influx in the lungs. Fu et al. (2014) observed a slight congestion and brown particulate
203 accumulation in spleen along with increased T and B cells and an enhanced NK cell activity after
204 instillation of P25 twice a week for 4 consecutive weeks in rats. In a similar protocol, Chang et al.
205 (2015) observed that rat immunologically competent cells CD3+, CD4+ and CD8+ were significantly
206 lower after exposure to P25 than in control group. Also, the ratio of CD4+ to CD8+ was significantly
207 increased showing a disturbance of cellular immune function. However, no significant changes in
208 IFN-γ and IL-4 were observed.

209 During OVA sensitization and challenge studies, exposure to TiO₂-NP can display an adjuvant
210 activity on allergic airway inflammation depending on the timing of exposure. Indeed, this timing may
211 account for differences in effects induced by TiO₂ nanoparticles by either promoting inflammation
212 when TiO₂ exposure occurs prior to challenge (De Haar et al. 2006, Kim et al. 2017) or suppressing
213 such effect when exposure is subsequent to the challenge (Scarino et al. 2012, Rossi et al. 2010).
214 All these studies have used only one dose, except the study by Scarino et al. where rats were
215 exposed by nose-only inhalation to 9.4 or 15.7 mg/m³ of anatase 5 nm for 6 hours. Interestingly, two
216 studies (Kim et al. 2017, Rossi et al. 2010) have evaluated a functional parameter i.e. airway
217 hyperresponsiveness in addition to biochemical markers of inflammation. In the study by Rossi et al.
218 (2010), TiO₂-NPs (silica coated, needle-like; 10 x 40 nm), administered at 10 mg/m³ 3 times a week
219 for 2 hours for 4 weeks, downregulated Th2 type inflammation (i.e. infiltration of eosinophils and

220 lymphocytes in the lungs and expression of Th2 cytokines) and reduced the OVA-induced air
221 hyperresponsiveness to the control levels of non-sensitized mice. In another study with sensitization
222 and challenge with TDI, the authors showed that acute instillation of TiO₂-NPs (anatase; 15 nm) at
223 0.8 mg/kg significantly increased the inflammatory response in TDI-sensitized animals (significantly
224 higher neutrophils, macrophages infiltration) (Hussain et al. 2011). In rats primed with endotoxin,
225 anatase (20 nm) TiO₂-NPs caused a significant amplification of the inflammatory response induced
226 by endotoxin or the particles alone after acute instillation (Oberdörster et al. 2000).

227 Liu et al. (2010) observed a reduced chemotactic ability and decreased expression of both Fc
228 receptors and MHC-class II molecules on the alveolar macrophage cell surface after acute instillation
229 exposure to anatase 5 nm. The mechanism responsible for this effect appears to involve increased
230 nitric oxide and tumour necrosis factor- α .

231 Gustafsson et al. (2011) demonstrated that intra-tracheal exposure to P25 at 5 mg/kg in rats induced
232 a transient influx in eosinophils and a more sustained neutrophilic response, followed by a
233 recruitment of dendritic cells and lymphocytes expressing NK receptors. In line with the study of
234 Chang et al. (2015) described above, a late-phase influx of lymphocytes to the rat lungs was
235 dominated by CD4+ T-cells with smaller fractions of CD8+ T-cells and B-cells.

236 Scuri et al. (2010) whole-body exposed newborn, young and adult rats for 3 days to 12 mg/m³ of
237 P25. Although no differences were observed in BALF analysis and in lung histopathology, they
238 showed that exposure of newborn and weanling rats to P25 influenced the expression of lung
239 neurotrophins (NGF and BDNF), which play a critical role in the pathophysiology of childhood
240 asthma.

241

242 4.2.2.4 Neurotoxicity

243 Eleven studies related to the neurotoxicity of TiO₂-NP have been evaluated: eight of them were from
244 the same laboratory in China and investigated in mice:

245 1) the brain toxicity of the daily intranasal administration (500 μ g in 10 μ L Milli-Q
246 water/mouse/day) for 30 days of 4 preparations of TiO₂-NP that differed by size and surface
247 coating (Zhang et al. 2011);

248 2) differences in brain toxicity of TiO₂-NP according to the crystalline form of the preparation
249 (anatase vs rutile), 500 μ g in 10 μ L Milli-Q water/mouse/day for 30 days (Wang, Liu, et al.
250 2008, Wang, Chen, et al. 2008);

251 3) the effect on brain and behaviour of the daily intranasal administration of TiO₂-NPs for 90
252 days at 3 doses (2.5, 5 and 10 mg/kg/day) (Ze et al. 2013, Ze, Sheng, Zhao, Ze, et al. 2014,
253 Ze, Sheng, Zhao, Hong, et al. 2014, Ze, Hu, et al. 2014);

254 4) the neurotoxicity of the chronic intranasal administration (9 months) at doses of 1.25, 2.5
255 and 5 mg/kg/day (Ze et al. 2016).

256

257 The results obtained from Zhang et al. (2011) showed that the most deleterious effects on the brain
258 (histological lesions of hippocampus and cortex tissue, and disturbances of extracellular dopamine,
259 serotonin and noradrenergic levels measured in the same regions) were observed with rutile Si-
260 coated TiO₂-NP (diameter = 10 or 50 nm) intranasally instilled (500 µg in 10 µL Milli-Q
261 water/mouse/day) for 30 days compared to rutile uncoated TiO₂-NP (1 µm or 10 nm in diameter
262 according to the preparation studied) administered using the same protocol.

263 The two studies by Wang and colleagues aimed to compare the neurotoxicity of a once every two
264 days intranasal administration of 10 µL of two suspensions of non-coated TiO₂-NP for 30 days in
265 female mice, one preparation containing rutile TiO₂ (diameter = 80 nm) and the other one anatase
266 TiO₂ (diameter = 155 nm) (Wang, Liu, et al. 2008, Wang, Chen, et al. 2008). The results indicated
267 the same histological and neurochemical alterations with both forms after 30 days of exposure, which
268 were more pronounced with the anatase form compared to the rutile one. Results also showed a
269 higher susceptibility of hippocampus to TiO₂-NP compared to the other brain regions studied that
270 was correlated with the greater accumulation of TiO₂ observed in this part of the brain.

271 Studies from Ze and colleagues assessed the neurotoxicity in hippocampus of a repeated intranasal
272 instillation of TiO₂-NP for 90 days at doses of 2.5, 5.0 or 10 mg/kg/day in mice. TiO₂-NP (anatase 6
273 nm, surface area 175 m²/g form) was suspended in HMPC 0.5% for administration (Ze et al. 2013,
274 Ze, Sheng, Zhao, Ze, et al. 2014, Ze, Sheng, Zhao, Hong, et al. 2014, Ze, Hu, et al. 2014). The
275 findings of the four studies showed a translocation and accumulation of TiO₂-NP in brain with an
276 overall proliferation of glial cells, tissue necrosis and signs of cellular degeneration observed in the
277 hippocampus considered as a brain region of interest. Changes in hippocampal cell ultrastructure
278 were observed in both TiO₂-NP exposed groups and were indicative of cell apoptosis (Ze, Hu, et al.
279 2014) possibly related to oxidative stress (Ze et al. 2013, Ze, Hu, et al. 2014) through activation of
280 the p38-Nrf-2 signalling pathway (Ze et al. 2013), neuroinflammation and alterations of cytokine
281 expression (Ze, Sheng, Zhao, Hong, et al. 2014). Down- or up-regulations of brain gene expression
282 in genes associated with oxidative stress, immune response, apoptosis, memory and learning, brain
283 development, signal transduction, metabolic process, DNA repair, response to stimulus and cellular
284 process were observed with the dose of 10 mg/kg TiO₂-NP in the same region (Ze, Hu, et al. 2014).
285 Finally, subchronic TiO₂-NP exposure induced significant long-term potentiation reduction and down-
286 regulation of glutamate NMDA receptor subunits (NR2A and NR2B) expression associated with the
287 simultaneous inhibition of CaMKIV, cyclic-AMP responsive element binding proteins (CREB-1,
288 CREB-2) and FosB/DFosB in mouse hippocampal tissues, with a spatial memory recognition
289 impairment (Ze, Sheng, Zhao, Ze, et al. 2014). Taken together, all these results suggest dose-
290 dependent neurotoxicity of TiO₂-NP in anatase form, with hippocampus as a brain region of higher
291 susceptibility, leading to impairments of synaptic plasticity and learning performances possibly
292 related to neuroinflammation and oxidative stress.

293

294 Three other studies using intratracheal instillation (Horvath et al. 2017) or inhalation (Disdier et al.
295 2017, Yin et al. 2014) for TiO₂-NP exposure were also considered. In the study from Horvath et al.
296 (2017), adult rats were dosed intratracheally (1 mL/kg b.w., 5days/week) daily for 28 days with a

297 suspension of TiO₂-NP (diameter = 10 nm) in PBS-HEC 1% at doses of 1, 3 or 10 mg/kg/day and
298 were studied for various electrophysiological activities including spontaneous cortical activity,
299 sensory evoked potentials and tail nerve action potential. Results showed the slow-down of the
300 sensory evoked potentials and tail nerve action potential which were moderately correlated with brain
301 Ti level and oxidative stress parameters. In the study of Disdier et al. (2017), young and aged rats
302 (12-13 weeks and 19 months of age, respectively) were exposed to TiO₂-NP (75% anatase and 25%
303 rutile, Aeroxide P25, diameter = 21 nm) nose-only 6 hours/day, 5 days/week for 4 weeks. Results
304 showed increasing blood-brain barrier permeability in aged rats associated with neuroinflammation
305 and decreased synaptophysin, a marker of neuronal activity. Yin et al. (2014) observed significant
306 increases of H₂O₂ and MDA concentrations in mice brain homogenate extracts after whole body
307 inhalation exposure to 6 mg/m³ of 20 nm anatase TiO₂-NP for 3 weeks, suggesting that the brain
308 was injured after inhalation of TiO₂-NP. No histological lesions were observed in this study.

310 4.2.2.5 Liver toxicity

311 Few studies have investigated liver toxicity induced by TiO₂-NPs. Halappanavar et al. (2011), in a
312 study described above (cf. 3.4.1.1), observed no changes in the liver in a transcriptomic analysis.

313 A 4-week instillation study performed with TiO₂-NP (80% anatase/20% rutile, 21 nm) at
314 concentrations of 0.5, 4 and 32 mg/kg twice a week in male Sprague-Dawley rats showed statistically
315 significant increases in the AST level and oedema and loose cytoplasm on liver cells (Chang et al.
316 2015).

318 4.2.2.6 Kidney toxicity

319 Huang et al. (2015) studied effects of P25 TiO₂-NP exposure by instillation for 4 weeks at
320 concentrations of 0.1, 0.25 or 0.5 mg/week on kidneys of ICR mice.

321 TiO₂ contents in the kidneys of P25-treated mice were significantly increased as compared with
322 controls. Incidences of histological changes such as tubular dilation, necrosis and loss of the brush
323 border were statistically significant at 0.5 mg/week and dose dependent. Alterations in oxidative
324 stress markers (HO-1, nitrotyrosine, HIF-1 α ...) and renal function markers (BUN and creatinine) were
325 also observed.

328 4.3 Genotoxicity

329

330 Publications related to mutagenicity of TiO₂-NP have been summarized in several reviews (Chen,
331 Yan, and Li 2014, Magdolenova et al. 2012, Charles et al. 2018, ANSES 2016).

332

333 ***In vitro:***

334 Many *in vitro* genotoxicity studies are available for TiO₂-NP. A review of *in vitro* data published
 335 between 2010 and 2016 was performed by Charles et al. (2018). A summary of the studies with the
 336 higher level of confidence is presented in the table below.

337 Most of the published results refer to the anatase form as well as mixture of anatase and rutile
 338 (generally P25). Very few studies assessed the genotoxicity of coated TiO₂-NP or rutile forms.

339 **Table 5: Summary of genotoxicity studies on TiO₂-NP (from Charles et al. (2018))**

Form of the TiO ₂ -NPs tested	MN assay	Comet assay	Chromosomal aberrations assay	Total
Anatase	14/25 (56%)	46/77 (58%)	1/3 (33%)	61/105 (58%)
Rutile	3/3 (100%)	12/24 (50%)	0/0 (0%)	15/27 (55%)
Mixture anatase/rutile	7/15 (47%)	25/37 (68%)	0/2 (0%)	32/54 (59%)
Coated-rutile	2/3 (67%)	8/13 (61%)	0/0 (0%)	10/16 (62%)
Rutile-brookite-anatase	0/1 (0%)	0/0 (0%)	0/0 (0%)	0/1 (0%)
Coated-anatase	1/2 (50%)	1/4 (25%)	0/0 (0%)	2/6 (33%)
Anatase-brookite	0/1 (0%)	4/6 (67%)	0/0 (0%)	4/7 (57%)
Coated-anatase-brookite	1/2 (50%)	15/16 (94%)	0/0 (0%)	16/18 (89%)
Total	18/52 (35%)	111/177 (63%)	1/5 (20%)	140/234 (60%)

^aSince specific protocol parameters (e.g. cells, media, exposure-duration, standard or modified protocol, etc.) and forms of TiO₂-NPs varied among the 88 assays, the number of total testing conditions ended up to 234.

340

341

342 According to Charles et al. (2018), both negative and positive results are reported in the *in vitro*
 343 mutagenic assays. Most of the positive results were found at high doses in micronucleus and Comet
 344 assays with a dose-response relationship. Inconsistencies observed in the results of the studies may
 345 be the result of differences in test materials (e.g. size, crystallinity, coating). However, it currently
 346 remains difficult to highlight which parameter(s) could drive these differences. Those inconsistencies
 347 could also be explained by the various test conditions used, including dispersion of the material,
 348 concentrations and exposure duration, cell/organ examined and parameter assessed. Moreover,
 349 numerous interferences with TiO₂ can occur due to fluorescence and absorbance interaction. Other
 350 interactions with the proteins or enzymes used during the assay are likely to occur; unfortunately,
 351 these interferences were not properly tested in most of the publications. All these elements did not
 352 permit an easy comparison of the studies.

353

354 ***In vivo:***

355 A review of the available *in vivo* studies has been performed by ANSES (2016) with the following
 356 statements: "Several *in vivo* studies with different protocols, tested materials, routes of exposure are
 357 available with TiO₂-NP. Most of the studies referred to the anatase form. Thirty-eight experiments
 358 over the 125 identified reported positive results. Most of the positive results were found in Comet
 359 assays, 8-oxodG tests and H2Ax phosphorylation assays. Several limitations can be noted from
 360 almost all studies including the lack of positive control, the absence of evidence of uptake, insufficient
 361 characterization of the tested material etc".

362

363 **Table 6 : Summary of positive responses in function of crystalline phase of TiO₂-NP according to the**
 364 **authors – all routes of exposure (extracted from ANSES (2016))**

Assays	Micronucleus assay	Comet assay	Mutation assay	DNA oxidative lesions	DNA adducts	H2Ax phosphorylation assay	Total
Nanoforms							
Anatase	2/9	5/22	0/7	5/6	0/0	1/1	13/45
Rutile	0/2	0/0	0/0	1/3	0/0	0/0	1/5
Anatase/rutile	3/7	8/20	2/2	1/2	0/1	1/1	15/33
Anatase coated	0/1	1/5	0/0	0/0	0/0	0/0	1/6
Rutile coated	0/6	5/22	0/1	0/0	0/0	0/0	5/29
Anatase/rutile coated	0/0	0/0	0/0	0/1	0/0	0/0	0/1
Brookite/anatase	0/1	0/1	0/0	0/0	0/0	0/0	0/2
Unspecified	1/1	1/1	0/0	1/2	0/0	0/0	3/4
Total	6/27	20/71	2/10	8/14	0/1	2/2	38/125

365 Some studies include several experiments with different NM and some NM can show negative and positive results within
 366 a study, depending on the organ examined. Each result was counted in all the relevant sections. An experiment is defined
 367 by a tested material and a specific protocol (ex. organ examined, duration...).

368

369 Based on the ANSES (2016) review, an update of the literature search for TiO₂-NP has been
 370 performed up to December 2017, focusing on *in vivo* studies carried out by the respiratory route (see
 371 annex 2). The following new *in vivo* studies by respiratory route have been identified in the literature:

372

373

374 **Tableau 7 : Summary of the *in vivo* mutagenicity studies performed with TiO₂-NP by the respiratory**
 375 **route, identified during the update of the literature search**

Method	Results	Remarks	Reference
INHALATION ROUTE			
BALB/CcJ female mice TiO ₂ anatase, 10 nm, BET: 173 m ² /g, geometric mean diameter in dispersion: 504 nm (mostly aggregates/agglomerate) - 1.1x10 ⁵ particles/cm ³ 271 mg/m ³ for 1 hour, inhalation head-only (as dry powder)	Comet: Positive in the lung Airway irritation, lung inflammation	No positive control presented Only one high concentration.	Larsen et al. (2016)

<p>Estimated deposited dose in airways: 90.5 µg</p> <p>Comet assay on BAL and lung 24h after inhalation</p>			
INSTILLATION ROUTE			
<p>Male Sprague-Dawley rats (12/group)</p> <p>P25 in PBS (phosphate-buffered saline): primary particles (25 +/- 15 nm) and 100 nm agglomerates</p> <p>3 endotracheal instillation at a 4-days interval. Sacrifice after 2h and 35 days.</p> <p>0.17, 0.83, and 3.33 mg/ml, respectively, by instillation --> total: 0.5, 2.5, and 10 mg/kg or 87, 437, and 1700 cm²/lung.</p> <p>Comet assay on lung cells, blood cells and liver cells</p> <p>γ-H2AX assay on lung, blood and liver cells</p> <p>Pig A in blood cells 35 days after exposure.</p>	<p>Comet assay: Positive (lung, blood and liver after 2h and/or 35 days). No increase of hedgehog.</p> <p>γ-H2AX assay: Positive in lung (immediately after exposure at highest dose) and Negative in liver and blood</p> <p>Pig A: Negative</p> <p>Acute lung inflammation (only 2h after administration) but no oxidative stress.</p> <p>Kinetics part of the study: measured lung burdens after 3 months (20%, 63%, and 83% of initial lung burden for low, mid, and high doses, respectively) --> half-retention time > 60 days for the 2 highest doses.</p>	<p>No negative or positive control presented</p> <p>Instillation route, worst case exposure (bolus administration)</p>	<p>Relier et al. (2017)</p>
<p>Female mice (8/dose/time point)</p> <p>NRCWE-001: TiO₂ unmodified rutile with endogenous negative surface charge; 10 nm; BET = 99 m²/g</p> <p>NRCWE-002: TiO₂ rutile with positive surface charge by coating with 3-aminopropyltriethoxysilane (purity 99%); 10 nm; BET = 84 m²/g</p> <p>Agglomerates smaller than 100 nm in water</p> <p>18, 54 or 162 µg/mouse by instillation, mice were killed after 1, 3 or 28 days.</p> <p>Comet assay on BAL cells, lung and liver tissues.</p>	<p>NRCWE-001: Positive in the lung (at 1 and 28 days) and in the BAL (at 18 and 54 µg on day 3) but Negative in the liver</p> <p>NRCWE-002: Positive in the lung (at 1 and 28 days) and in the liver and the BAL (only on day 1; not consistent finding)</p> <p>Inflammation, time and dose-dependent which persisted at the highest dose 28 days after exposure.</p>	<p>No significant effect of the charge on the result of the comet assay</p> <p>Instillation route, worst case exposure (bolus administration)</p>	<p>Wallin et al. (2017)</p>

<p>gpt delta transgenic mice (4-8/groups; both sexes)</p> <p>TiO₂; 28 nm ; 10-60 nm by TEM; BET = 45 m²/g; 90% anatase/10% rutile</p> <p>In physiological saline = 280 nm (DLS).</p> <p>50 µg administrated by instillation once. Lung collected 4 months after exposure.</p> <p>Determination of gp mutant frequency (genomic DNA from lung)</p> <p>8 oxodG measured in the lung by ELISA</p> <p>γ-H2AX assay</p>	<p>gp mutant frequency: negative</p> <p>8 oxodG: negative</p> <p>γ-H2AX assay: negative (slight but not significant increase)</p> <p>None or a mild inflammatory response, no obvious fibrotic response in the lungs at 4 months after TiO₂ exposure</p>	<p>Negative control included but no positive control.</p> <p>Instillation route, worst case exposure (bolus administration)</p> <p>Only one high concentration.</p>	<p>Wan et al. (2017)</p>
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376

377

378 Similarly to *in vitro* data, results from *in vivo* studies are inconsistent and positive results are provided
 379 mainly by Comet tests at high doses. It was again not possible to identify the causes of the
 380 inconsistencies (e.g. different protocols, different forms of TiO₂-NP). It should also be noted that most
 381 of the *in vivo* studies are associated with several methodological limitations (lack of positive control,
 382 no proof of target organ exposure, insufficient characterization of the tested material, non-
 383 physiological route of administration, etc...)

384

385 **Hypothesized genotoxic mode of action of TiO₂-NP:**

386 Primary genotoxicity could be the result of direct interaction with DNA or indirect mechanisms with
 387 molecules interacting with the genetic material. Secondary genotoxicity could result from ROS
 388 generated by the catalytic potential of the particles, activation by UV light or during particle-elicited
 389 inflammation.

390 Theoretically, TiO₂-NPs may **interact with DNA**, since particles were detected (by TEM and/or
 391 Raman imaging) inside the nucleus in a few *in vitro* and *in vivo* studies. However, the possible
 392 mechanism of penetration into the nucleus is unclear.

393 DNA damage can also arise through **indirect mechanisms** where the NPs do not physically interact
 394 with the DNA molecule. In particular, decreased nucleotide excision repair (NER) and base excision
 395 repair (BER) activities reported in A549 cells exposed to TiO₂-NPs (Jugan et al. 2012, Armand et al.
 396 2016) suggest an effect on repair mechanism. In addition, some publications reported disturbances
 397 of mitosis and abnormal multipolar spindle formation, chromosomal alignment and segregation
 398 during anaphase and telophase, as well as disturbance of the cell cycle checkpoint function
 399 (Magdolenova et al. 2012). It is difficult to judge the relevance of these results since there is no
 400 harmonized tool to investigate these types of mechanisms.

401 **Secondary genotoxicity** can be induced by ROS or reactive nitrogen species (RNS) generated at
402 the surface of NPs or produced by inflammatory cells. Positive results reported both *in vitro* and *in*
403 *vivo* were often associated with oxidative stress (evidenced by increase of ROS production,
404 glutathione content, lipid peroxidation, malondialdehyde level, antioxidant enzyme level or
405 suggested in the *in vitro* comet assay where specific DNA repair enzymes had been added) and/or
406 with inflammation (up-regulation of pro-inflammatory cytokines and increased cells such as
407 neutrophils in the BALF) (Charles et al. 2018).

408 In summary, the production of ROS seems to be the major mode of action explaining these effects,
409 as evidenced by oxidative stress/ inflammation reported in many positive studies. However, ROS
410 production may not be the sole mechanism explaining the genotoxicity found with TiO₂-NPs. At
411 present, other mechanisms of action cannot be formally ruled out but there is no validated tool to
412 investigate other possible genotoxic modes of action.

413

414 **Conclusion on genotoxicity of TiO₂-NP:**

415 Data from published reviews on the genotoxic potency of TiO₂-NP are numerous resulting from a
416 large panel of tests carried out both *in vitro* and *in vivo*, of variable quality. In addition, various forms
417 of TiO₂-NP with different physico-chemical characteristics (shape, size, coating, surface reactivity,
418 charge, crystallinity...) were tested in rodents by inhalation or intratracheal instillation and on several
419 cell types and tissues under different conditions of exposure. Although an impressive data set is
420 available, it is still difficult to distinguish the key physico-chemical parameter(s) of the nanoparticles
421 that are related to the genotoxic effect.

422 Despite the inconsistency of the response among all the available data, it is noted that TiO₂-NP may
423 induce genotoxicity in rodent lungs but also in organs such as liver and in *ex vivo* cells or cell lines.
424 Most of dose-related positive results were obtained in the Comet and micronucleus assays and only
425 at high concentrations. Such genotoxic effects are probably due to an increase in ROS/RNS
426 secondary to an inflammatory process that is frequently involved in the toxicity of TiO₂-NP. On the
427 other hand, it is still unclear whether other pathways than oxidative stress could also play a role in
428 the induction of DNA damage.

429 **In summary, considering that:**

- 430 - **the results from *in vitro* and *in vivo* mutagenic assays are rather inconsistent;**
- 431 - **the positive effects were primarily reported at high concentrations;**
- 432 - **the identification of the underlying reasons for the differences of responses reported**
433 **is not possible;**
- 434 - **the data point to a secondary genotoxic mode of action involving ROS/RNS**
435 **production;**
- 436 - **the carcinogenic effects appear only at high concentrations, associated with altered**
437 **clearance and inflammatory responses (see also section 3.4.3),**

438 **it can be concluded that TiO₂-NP is a weak genotoxic agent. These conclusions are in line**

439 with those from other organisations or reviews of TiO₂ genotoxicity (IARC 2010, NIOSH 2011,
440 ANSES 2016, OECD 2018a, Charles et al. 2018).

441

442

443 4.4 Carcinogenicity

444 4.4.1 Human data

445 Seven epidemiological studies analyzed potential link between occupational exposure to TiO₂ and
446 the occurrence of cancers, including 5 report historical industry-based cohorts (Chen and
447 Fayerweather 1988, Fryzek et al. 2003, Boffetta et al. 2004, Ellis et al. 2010, Ellis et al. 2013) and 2
448 case-control studies (Boffetta et al. 2001, Ramanakumar et al. 2008). The characterization (size,
449 crystallinity) of TiO₂ is not provided in the publications. In this context, it cannot be excluded that
450 workers are exposed, at least partially, to TiO₂ under nanoform in these studies.

451 Despite the availability of five retrospective cohort studies, some of them share a large part of their
452 population leading in fact to only three separate populations. All of these studies present biases for
453 worker selection and possible misclassification of exposure and health status. Even with these
454 limitations, two publications on two different populations (one US and one European) reported
455 statistically increased mortality by lung cancer (Ellis et al. 2013, Boffetta et al. 2004). Boffetta et al.
456 (2004) reported a statistically significant increased standardized mortality ratio (SMR) for mortality
457 from lung cancer (23% increase considering all studied countries with a 51% increase in Germany).
458 Ellis et al. (2013) reported a significant increase of mortality by lung cancer (68% increase) when
459 comparing to Dupont referent workers. In addition, increased mortality by lung cancer of borderline
460 significance was also consistently found in all publications, except Chen & Fayerweather (1988).
461 The absence of statistical relationship between duration / level of exposure to TiO₂ and an excess
462 of lung cancer can be hidden due to the methodological deficiencies (bias selection, misclassification
463 of exposure and health status, worker health effect, confounding factors, categorization by level of
464 exposure etc.).

465 Regarding case-control studies, they are judged of limited relevance to conclude on lung
466 carcinogenicity of TiO₂ considering the mode of action expected to be primarily linked to its dust
467 nature.

468 In conclusion, the epidemiological data are inadequate to conclude on the carcinogenicity of TiO₂-
469 NP (Guseva Canu et al., 2019¹⁵).

470 4.4.2 Animal data

471

¹⁵ This study, outside the time period of the bibliographic search, was exceptionally added as Anses was involved.

472 Carcinogenic potential of TiO₂ (under micro and nanoforms) was reviewed by IARC (IARC, 2006 &
 473 2010), by NIOSH (NIOSH 2011) and also recently by RAC (Risk Assessment Committee) of ECHA
 474 (ECHA 2017) in the framework of CLP Regulation (EC n°1272/2008), based on a classification
 475 proposal made by France (ANSES 2016, ECHA 2017).

476 Experimental studies on TiO₂-NP are summarized in table 8 below.

477 **Table 8 : Summary of animal carcinogenicity data on TiO₂-NP by respiratory route (extracted from**
 478 **ANSES, 2016)**

Method	Results	Remarks	Reference
Inhalation route			
Female Wistar rats [CrI:(WI)BR] and NMRI mice TiO ₂ , 15-40 nm, P25 (≈ 80% anatase and ≈ 20% rutile) Whole body exposure by inhalation: 18h/d, 5 days/week: 7.2 mg/m ³ for the first 4 months, then 14.8 mg/m ³ for 4 months followed by 9.4 mg/m ³ for 16 months for rats and 5.5 months for mice (cumulative particle exposure: 88.1 g/m ³ xh for rats and 51.5 g/m ³ xh for mice) Recovery period: 6 months for rats and 9.5 months for mice Not guideline, no GLP status	↑ benign keratinizing cystic squamous cell tumours, squamous-cell carcinomas, bronchioalveolar adenomas and adenocarcinomas in rats. Not carcinogenic in mice. ↑ mortality and ↓ body weight in both species. Impairment of clearance function, bronchioalveolar hyperplasia and interstitial fibrosis in rats.	Purity lacking. One concentration varying during the experiment, only females tested. High background tumour response in control mice. Non-neoplastic effects and lung clearance not reported in mice. R = 3	Heinrich et al. (1995)
Instillation route			
SPF Wistar female rats. TiO ₂ P25: 5x3mg, 5x6 mg or 10x6 mg by instillations TiO ₂ P805: 15x0.5 mg or 30 x0.5 mg by instillation Animals sacrificed after 30 months. Not guideline, no GLP status	↑ benign tumours (adenomas and epitheliomas) and malignant tumours (adenocarcinomas and squamous cell carcinomas) at all tested doses.	TiO ₂ -NP P25, majority anatase, 25 nm TiO ₂ -NP P805 (P25 coated with trimethoxyoctyl-silane), 21 nm Purity lacking. Only females tested. Higher number of tumours with TiO ₂ -NP compared to fine TiO ₂ . R = 2	Pott and Roller (2005)
F344/DuCrI Crj male rats	No promotor potential by instillation.	Many parameters did not match with standard protocol for carcinogenesis assessment; no valid	Yokohira et al. (2009)

<p>TiO₂-NP, 80 nm</p> <p>DHPN (initiation) for 2 weeks, then 0.5 mg/rat TiO₂ once in week 4 by instillation.</p> <p>Not guideline, no GLP status</p>	<p>No lung lesion without pre-treatment with DHPN.</p>	<p>positive control; only males tested; no clear information on crystallinity</p> <p>R = 3</p>	
<p>Hras 128 transgenic female rats</p> <p>TiO₂ non coated, rutile, 20 nm</p> <p>DHPN (initiation) for 2 weeks. Then, 250 µg/ml or 500 µg/ml TiO₂ once every 2 weeks from the end of the week 4 to week 16 by instillation.</p> <p>Not guideline, no GLP status</p>	<p>Promotor effect observed:</p> <p>↑ multiplicity of DHPN-induced alveolar cell hyperplasia and adenomas in the lung at all doses, and the multiplicity of mammary adenocarcinomas at 500 µg/ml.</p> <p>Not carcinogenic without pre-treatment with DHPN.</p>	<p>Purity lacking.</p> <p>Little experience with this model. No positive control included. Only females tested.</p> <p>R = 3</p> <p>Not reliable study.</p>	<p>Xu et al. (2010)</p>

479

480 Only one carcinogenicity study by inhalation is available with adequately characterized TiO₂-NP
 481 (Heinrich et al. 1995). Female Wistar rats [CrI:(WI)BR] and NMRI mice were exposed whole body
 482 18h/day, 5 days/week to aerosol of TiO₂ (P25, primary particle size 15-40 nm, ≈ 80% anatase and ≈
 483 20% rutile). The mean particle mass exposure concentration was 7.2 mg/m³ for the first 4 months,
 484 followed by 14.8 mg/m³ for 4 months and 9.4 mg/m³ for 16 months for rats and 5.5 months for mice.
 485 Following the exposure period, the animals were kept under clean air conditions for an additional 6
 486 months for rats and 9.5 months for mice. Rats developed lung tumours (benign keratinizing cystic
 487 squamous cell tumours, squamous-cell carcinomas, bronchioalveolar adenomas and
 488 adenocarcinomas) from 18 months of exposure. At the tested concentration, an increased mortality
 489 rate (60% versus 42% in the control group), a decreased body weight, an increase of lung wet weight,
 490 an alteration of alveolar lung clearance and non-neoplastic effects in the lung (bronchioalveolar
 491 hyperplasia and interstitial fibrosis) were also reported. No increased lung tumour rate was reported
 492 in mice. However, the high background tumour response in the control group might have limited the
 493 ability to detect any carcinogenic effects in this study.

494 Similar types of lung tumours were reported in rats intra-tracheally exposed to P25 (Pott and Roller
 495 2005). Finally, two other intra-tracheal studies assessing the promotor potential of TiO₂-NP (rutile 20
 496 nm or TiO₂-NP 80 nm) did not report any effect. However, the protocols used as not judged reliable
 497 and the studies have been disregarded (Xu et al. 2010, Yokohira et al. 2009).

498 An update of the literature search was performed until December 2017 focusing on studies carried
 499 out by the respiratory route (see annex 2). No reliable study was found in this update.

500

501

502 **Conclusion on carcinogenicity of TiO₂-NP:**

503 Based on the induction of lung tumours reported after inhalation and instillation exposures (Pott and
 504 Roller 2005, Heinrich et al. 1995), TiO₂-NP (P25 as material tested) is considered as a lung
 505 carcinogen in rats at a concentration resulting in pulmonary inflammation and altered clearance. This
 506 conclusion is in line with those of IARC (2006 & 2010), which classified TiO₂ (without more
 507 specifications) as possibly carcinogenic to humans (Group 2B), of NIOSH (2011), which considered
 508 ultrafine TiO₂ as potential occupational carcinogen and of RAC (ECHA, 2017), which concluded that
 509 TiO₂ (without further physico-chemical description) should be classified as Category 2 carcinogen
 510 (suspected human carcinogen) according to CLP Regulation. Especially, the RAC conclusion is
 511 based on a following weight-of-evidence approach:

- 512 - taking note that TiO₂ was not shown to be a multisite carcinogen,
- 513 - being aware that TiO₂ is a lung carcinogen especially in female rats,
- 514 - recognising that there are no robust carcinogenicity studies in species other than rats,
- 515 - recognising that the majority of rat lung tumours occurred late in life,
- 516 - recognising that rat lung tumours only developed under inhalation exposure conditions
 517 associated with marked particle loading of macrophages,
- 518 - presuming a practical threshold for lung tumour development (mutagenicity in lung cells is
 519 considered to depend on chronic inflammation and oxidative stress),
- 520 - taking note of experimental, mainly repeated dose toxicity data indicating a lower sensitivity
 521 of other small rodents, monkeys and humans compared to rats,
- 522 - being aware of TiO₂ epidemiology studies which do not consistently suggest an association
 523 between occupational exposure to TiO₂ and lung cancer mortality.

524

525 **4.5 Toxicity to reproduction**

526

527 The studies presented in the table below have been identified from the literature search performed
 528 up to 2017 focusing on studies carried out by the respiratory route (see annex 2).

529

530 No study performed with a standard protocol to assess fertility and development is available by
 531 respiratory route.

532

533 **Table 9 : Developmental toxicity studies identified in the literature for TiO₂-NP**

Method	Results	Remarks	Reference
INHALATION ROUTE			

<p>Pregnant female C57BL/6BomTac mice (22-23/group)</p> <p>UV-Titan L181 (rutile 70,8% modified with Zr Si, NaO, Al, coating polyalcohol); 21 nm</p> <p>40 mg/m³ (measured: 42.4 ±2.9 mg/m³; 1.70 ± 0.2 ×10⁶ part./cm³; peak size: 97 nm) whole-body for 1h/d; GD8-18</p> <p>Parameters: maternal lung inflammation, gestational and litter parameters; offspring neurofunction and fertility (exposure C57BL offspring cross-mated to naïve CBA/J mice)</p>	<p><u>Time-mated adult female mice:</u></p> <p>Lung contained 38 mg Ti/kg on day 5 and 33 mg Ti/kg on day 26-27 after exposure. Low or no Ti in liver. Decreased absolute and relative lung weight. No effect on gestational and litter parameters. Lung inflammation (BAL) 5 day and 26-27 days following exposure termination.</p> <p><u>Gestationally exposed offspring:</u></p> <p>Moderate neurobehavioral alteration (spent significantly less time in the central zone of the field and visited the central zone less frequently, startled less).</p> <p><u>Fertility part of the study:</u></p> <p>Low or no Ti in liver and milk. No significant effect on fertility.</p>	<p>Only one high concentration tested</p>	<p>Hougaard et al. (2010)</p>
<p>C57BL/6 mice</p> <p>UV-Titan L181 (rutile 70,8% modified with Zr Si, NaO, Al, coated with polyalcohol); 20.6 nm; BET = 107.7 m²/g</p> <p>42.4 mg/m³ for one hour/day; GD8-18 by inhalation, whole body.</p> <p>Female offspring were mated with unexposed CBA males. F2 descendants collected on PND2-7 or PND80 and ESTR germline mutation rates estimates from full pedigrees of F1 female mice</p>	<p>No evidence for increased ESTR mutation rates in F1 and F2 offspring.</p> <p>No effect on viability, no effect on sex-ratio.</p>	<p>Only one high concentration tested</p>	<p>Boisen et al. (2012)</p>
<p>Pregnant female C57BL/6 mice (n=12-13)</p> <p>UV-Titan L181 (rutile 70,8% modified with Zr Si, NaO, Al coated with polyalcohol); 20.6 nm</p> <p>Exposure to 42 mg/m³ for 1h/d by inhalation whole body; GD8-18</p> <p>F1 (C57BL/6J) offspring (n = 25) mated with unexposed CBA/J (cross-mating males/females)</p> <p>Assessment of male reproductive function in the two following generations (body and testicle weight, sperm content per g testicular parenchyma and daily sperm production (DSP))</p>	<p>Daily sperm production (DSP) not statistically affected in the F1 generation, although TiO₂ tended to reduce sperm counts (-12%).</p> <p>Time-to-first F2 litter increased with decreasing sperm production.</p> <p>Effect on sperm production in the F2 generation.</p>	<p>Only one high concentration chosen to correspond to half of the Danish OEL (8h). Need to optimize the method for measurement of DSP.</p>	<p>Kyjovska et al. (2013)</p>

<p>Time-mated C57BL/6Bom-Tac female mice (22-23/group)</p> <p>UV Titan L181</p> <p>Rutile surface coated, 17 nm, surface area: 70 m²/g</p> <p>Chemical composition: Na₂O (0.6%), SiO₂ (12.01%), Al₂O₃ (4.58%), ZrO₂ (1.17%), TiO₂ (70.81%). UV-Titan is coated with polyalcohol adding to the remaining wt %.</p> <p>Geometric mean size during inhalation exposure: 97 nm</p> <p>42 mg/m³ for 1h/day whole body during GD8-18.</p> <p>Parameters: Comet assay in BAL +/- liver; hepatic gene expression; lung inflammatory response</p>	<p>Persistent inflammation in mothers and affected gene expression in the liver of offspring, with increased response in female offspring.</p> <p>The observed changes in gene expression in the newborn offspring 2 days after birth suggest that anti-inflammatory processes were activated in the female offspring related to retinoic acid signalling.</p> <p>Negative <i>in vivo</i> comet assay (BAL and liver in the non-pregnant females and dams; liver in the newborn at PND 2 or weaned offspring at PND 22).</p>	<p>Only one high concentration.</p>	<p>Jackson et al. (2013)</p>
<p>Pregnant female Sprague-Dawley</p> <p>Aeroxide (anatase/rutile ; 21 nm)</p> <p>Whole body exposure to 11.3 ±0,039 mg/m³ for 5h/d from GD10 for an average of 8.2±0.85 days</p> <p>Microvascular tissue isolation (GD20) and arteriolar reactivity studies of the uterine premyometrial and fetal tail arteries</p>	<p>Significant maternal and fetal microvascular dysfunction.</p> <p>Isolated maternal uterine arteriolar reactivity consistent with a metabolically impaired profile and hostile gestational environment that impacted fetal weight.</p> <p>Isolated fetal microvessels demonstrated significant impairments to signals of vasodilation specific to mechanistic signalling and shear stress.</p>	<p>Only one concentration.</p> <p>Even if not clearly stated in the publication, tested material corresponds to P25</p>	<p>Stapleton et al. (2013)</p>
<p>Pregnant female Sprague-Dawley (6/group)</p> <p>Aeroxide (anatase/rutile ; 21nm)</p> <p>Exposure to 10.6 ±0.3 mg/m³ for 5h/d GD6-12 (average of 6.8±0.5 days) by inhalation, whole body.</p> <p>Maternal or litter characteristics (maternal weight, implantation site, pup/litter, progeny weight at w 8, 12, 16 and 20)</p> <p>Microvascular reactivity, mitochondrial respiration and hydrogen peroxide production of the coronary and uterine circulations of the female offspring evaluated between 11 and 16 weeks of age</p>	<p>No significant differences within the maternal or litter characteristics.</p> <p>No significant differences in spontaneous active diameter, passive diameter or vascular tone with respect to coronary arterioles. No oxidative stress (hydrogen peroxide production).</p> <p>Endothelium-dependent dilation and active mechanotransduction in both coronary and uterine arterioles abolished.</p> <p>Significant reduction in maximal mitochondrial respiration (state 3 – maximal mitochondrial state) in the left ventricle and uterus.</p>	<p>Only one concentration.</p> <p>May be attributed to altered NO signalling (decreased NO bioavailability associated with oxidative NO scavenging).</p> <p>Even if not clearly stated in the publication, tested material corresponds to P25</p>	<p>Stapleton, Nichols, et al. (2015)</p>
<p>Pregnant female Sprague-Dawley (4/group)</p>	<p>No effect on maternal weight, implantation site number or pup number per litter.</p>	<p>Few animals tested.</p> <p>Only one concentration.</p>	<p>Engler-Chiurazzi et al. (2016)</p>

<p>P25; count median aerodynamic diameter of 171 nm</p> <p>Exposure to 10.4 mg/m³ for 5h/d; 4d/w; GD7-20 (for 7.8±0.5 days) by inhalation whole body</p> <p>Behaviour and cognitive functions of male pups at 5 months of age</p>	<p>No effect on locomotor, balance, affective, anxiety-like or depressive-like behaviour in the male pups. Reference memory learning, retention, and perseveration not markedly altered.</p> <p>Prenatal TiO₂-NP exposure induced significant working or short-term memory impairments and initial motivation: alteration in cognitive behaviour.</p>		
<p>Pregnant female Sprague-Dawley</p> <p>P25 (anatase/rutile ; 21nm)</p> <p>Whole body exposure to 10.35+/-0.13 mg/m³; 5h/d treatments; from GD-6, with the last exposure given 24 h before birth, for a total of approximately 8 exposures (7.79+/-0.26 days)</p> <p>Physiological and bioenergetic effects on heart function and cardiomyocytes across three time points, fetal (GD20), neonatal (4-10 days), and young adult (6-12 wk).</p>	<p>Cardiac impairment of the progeny (systolic and diastolic abnormalities and cardiomyocyte contractile attenuation).</p> <p>Mitochondrial respiration dysfunction, with varying degrees of impairment across developmental stages.</p>	<p>Only one concentration.</p>	<p>Hathaway et al. (2017)</p>
<p>Pregnant female Sprague-Dawley</p> <p>P25 (anatase (80%) and rutile (20%)); primary particle size: 21 nm; specific surface area: 48.08 m²/g; zeta potential: -56.6 mV</p> <p>Real-time TiO₂-NP mobility diameter: 129 nm, aerodynamic diameter: 143 nm</p> <p>Exposure by whole-body inhalation to 10 ± 0.5 mg/m³, 4-6h/exposure, from GD5.78 ± 0.11 for 7-8 days (calculated, cumulative lung deposition = 217 ± 1 µg); isolation of 20 fetal hearts on GD20</p> <p>Investigation of cardiovascular function.</p>	<p>No effect on progeny weight or total number of pups.</p> <p>Significant epigenetic and transcriptomic changes in the cardiac tissue (increased cardiac function); altered signalling liver and kidney pathways; increased inflammatory signalling and growth/survival</p>	<p>Only one concentration.</p>	<p>Stapleton et al. (2018)</p>
INSTILLATION ROUTE			
<p>C57BL/6 mice (5-6/group)</p> <p>TiO₂ anatase; about 6 nm (stable colloidal suspension of primary particles) – self-prepared in a Research laboratory</p>	<p><u>Single dose</u>: inflammatory cell influx</p> <p><u>3-doses</u>: increased inflammation and inhibition of lung development (increased mean linear intercept and decreased radial alveolar count) without effect on function</p>	<p>Only one concentration.</p> <p>Instillation route, worst case exposure (bolus administration)</p>	<p>Ambalavanan et al. (2013)</p>

<p>Treatment at 1 mg/kg on PND4 or PND4, 7 and 10</p> <p>Measurement of lung function (compliance and resistance), development (morphology), inflammation (histology; multiplex analysis of BALF for cytokines) on PND14</p>	<p>Macrophages were noted to take up the TiO₂-NP, followed by polymorphonuclear infiltrate</p> <p>Inflammatory cytokines and matrix metalloproteinase-9 were increased in lung homogenates, and VEGF was reduced</p>		
<p>Pregnant female C57BL/6 mice</p> <p>TiO₂ anatase; 12.3 nm; BET: 96 m²/g; zeta potential at pH7: 3.7 and hydrodynamic diameter: 1280 nm</p> <p>3 instillations of a weekly dose of 100 µg on GD2.5, 9.5 and 16.5</p> <p>Lung examination at GD17.5 (fetal stage); at PND 14.5 (pulmonary alveolarization) and at PND49.5 (lung maturity)</p> <p>Analysis of foetotoxicity on GD17.5</p> <p>Measurement of cytokines on GD17.5</p> <p>Chemical analysis of placenta and fetal lungs on GD17.5</p>	<p>Long-lasting impairment of lung development of the offspring. Increase of the alveolar space and a decrease of the number of alveoli on PND14.5 and 49.5.</p> <p>Decreased placental efficiency together with the presence of NPs in placenta, no increase of inflammatory mediators present in amniotic fluid, placenta or offspring lungs.</p> <p>Decreased pulmonary expression of vascular endothelial growth factor-a (VEGF-a) and matrix metalloproteinase 9 (MMP-9) at the fetal stage, and fibroblast growth factor-18 (FGF-18) at the alveolarization stage.</p> <p>No effect on uterine weight, fetal resorption rates and number of living fetuses. Decreased fetal weight.</p> <p>Increase of inflammatory cells in the lung of pregnant females.</p>	<p>Only one concentration.</p> <p>Instillation route, worst case exposure- (bolus administration)</p> <p>Hypothesis: administration of NPs in pregnant mice is followed by an effect on the placenta with impact on the respiratory development of the offspring.</p>	<p>Paul et al. (2017)</p>

534

535 Effects of in utero exposure of two forms of TiO₂-NP, UV-Titan L181 (Kyjovska et al. 2013, Jackson
 536 et al. 2013, Hougaard et al. 2010, Boisen et al. 2012) and P25 (Stapleton, Nichols, et al. 2015,
 537 Stapleton et al. 2013, Hathaway et al. 2017, Engler-Chiurazzi et al. 2016, Stapleton et al. 2018) were
 538 evaluated by inhalation by different groups .

539

540 Effects of surface-coated TiO₂-NP, UV-Titan L181 (rutile (70.8 wt%) modified with unspecific
 541 amounts of zirconium (0.86-1.17 wt%), silicon (12 wt%), aluminium (4.58 wt%) and sodium oxide
 542 (0.6 wt%), and coated with polyalcohols (crystallite primary particle size 20.6 nm; surface area 107
 543 m²/g; geometric mean diameter 97 nm)) was studied in C56BL/6 mice and their offspring by the
 544 same group (Kyjovska et al. 2013, Hougaard et al. 2010, Boisen et al. 2012). In these studies,
 545 pregnant females were whole-body exposed 1h/day to either filtered clean air, or a target
 546 concentration of 40 mg/m³ of UV-Titan L181 (42.4 ± 2.9 mg/m³ measured over all the experiments)
 547 from gestational day 8 to 18.

548

549 Lung inflammation was noted in the BALF (with increased neutrophils) of the exposed dams, 5 and
550 26-27 days after exposure termination, relative to controls. In the offspring examined at age 11-15
551 weeks (males) or 12-16 weeks (females), cognitive functions were unaffected, while moderate
552 neurobehavioral changes were noted (in open field test). In contrast, no significant effect on
553 gestational and litter parameters or on fertility was reported (Hougaard et al. 2010).

554 No increased ESTR (expanded simple tandem repeat) mutations were measured in the F1 females
555 exposed in utero to UV-Titan 181 and in the F2 offspring of prenatally exposed female mice, as
556 compared to controls. There was also no effect on viability or sex ratio (Boisen et al. 2012).

557 Daily sperm production was not statistically significantly affected in F1 and F2 offspring. Only a trend
558 in reduced sperm counts was recorded in the F1 generation with an increase in time-to-first F2 litter
559 (Kyjovska et al. 2013).

560 No increase of DNA strand breaks was noted in BALF of time-mated mice or in the liver of both time-
561 mated mice and their offspring. In contrast, exposure to UV-Titan 181 induced a persistent
562 inflammation in mothers and affected gene expression in the liver of female offspring (Jackson et al.
563 2013).

564 It is worth to notice that the relevance of the results from the above mentioned studies is questionable
565 given the high concentration used (42 mg/m³).

566

567 Aeroxide TiO₂ P25 (anatase 80%, rutile 20%; primary particle diameter 21 nm, average aerodynamic
568 diameter of agglomerates formed during aerolization: 149.1 ± 3.7 nm; surface area 48 m²/g; zeta
569 potential -56.6 mV) was studied on female Sprague Dawley rats and their offspring in different
570 studies performed by the same group (Stapleton, Nichols, et al. 2015, Stapleton et al. 2013,
571 Hathaway et al. 2017, Engler-Chiurazzi et al. 2016, Stapleton et al. 2018). In these studies, pregnant
572 females were exposed whole-body 5h/day to either filtered clean air (control ; 0 mg/m³) or a target
573 concentration of 10 mg/m³ after implantation (from gestation day 6, 7 or 10), with an average duration
574 of about 7-8 days. The generated aerosols excluded agglomerates > 400 nm, and exposure started
575 once the steady state aerosol concentration was achieved. Concentrations were monitored in real
576 time, as well as the particle size distribution (using a scanning device).

577 Impact of the duration of exposure (≤ 7 days versus ≥ 7 days) was investigated in Stapleton et al.
578 (2013). The authors showed significant decreases in the average litter size and weight, and in pup
579 weight after 11 days of inhalation exposure, while an exposure of 7 days had no effects on maternal
580 weight, implantation sites, litter size, sex of pups or female progeny weight gain. No significant
581 differences within the maternal or litter characteristics (maternal weight, implantation site, number
582 and weight of pups) were noted in the consecutive studies (Stapleton et al. 2013, Engler-Chiurazzi
583 et al. 2016, Stapleton et al. 2018).

584 Microvascular characteristics were analysed by Stapleton, Nichols, et al. (2015), Stapleton et al.
585 (2013). The authors reported fetal microvascular dysfunction after in utero P25 exposure, with an

586 impaired ability of uterine arterioles to properly dilate and an impaired microvascular function.
587 Endothelium-dependent dilation and active mechanotransduction in both coronary and uterine
588 arterioles were significantly altered in the female progeny studied at 11-16 weeks of age. In addition,
589 a significant reduction in maximal mitochondrial respiration in the left ventricle and uterus was noted.
590 Hathaway et al. (2017) confirmed this decrease in basal and maximal respiration, and related this to
591 the systolic and diastolic abnormalities and cardiomyocytes contractile attenuation observed in the
592 progeny. Finally, Stapleton et al. (2018) reported a decreased cardiac dysfunction (characterized by
593 epigenetic and transcriptomic changes) in foetuses while showing a propensity toward hepatic and
594 renal disease and increased inflammatory signalling.

595 Regarding neurotoxicity, the behaviour and cognitive functions of pups were evaluated at 5 months
596 of age by Engler-Chiurazzi et al. (2016). They showed significant working memory impairments,
597 especially under maximal mnemonic challenge, and possible deficits in initial motivation in male F1
598 adults. According to the authors, these results indicate that maternal exposure during gestation
599 produces psychological deficits that persist into adulthood in male rats.

600

601 Two additional studies carried out by the instillation route have been identified. Both focused on
602 effects of TiO₂-NP (anatase) on the development of the lungs.

603 Intranasal instillation of TiO₂-NP (anatase, 6 nm) were used in newborn C57BL/6 mice to study
604 effects on lung development (Ambalavanan et al. 2013). A dose equivalent to 1 mg/kg body weight
605 (5 µl of NP suspension) was instilled either at post-natal day (PND) 4 (single-dose experiment) or at
606 PND 4, 7, 10 (multiple-dose experiment) and compared to mice exposed to vehicle. Administration
607 of anatase caused inflammatory cell infiltrates and inhibited lung development in both single- and
608 multiple-dose experiments. Inflammatory cells consisted of macrophages containing accumulation
609 of TiO₂-NP surrounded by other inflammatory cells (polymorphonuclear and some mononuclear
610 cells). No alteration of lung function or pulmonary vascular modeling was recorded, but gene
611 expression and protein amounts of specific cytokines were increased in lung homogenates, as well
612 as MMP-9 (known to be involved in lung injury and inhibition of development). There was also an
613 overexpression of proinflammatory cytokines such as IL-1β, known to impair lung alveolarization.
614 VEGF (vascular endothelial growth factor), important for normal lung development, was decreased,
615 this decrease may contribute to impairment of alveolarization. The authors concluded that these
616 effects possibly impact the risk of respiratory disorders in later life.

617

618 TiO₂-NP (anatase, 12 nm) was also shown to impair lung development of the offspring of C57BL/6
619 female mice (Paul et al. 2017). The pregnant mice were anesthetized and treated with 10 µl of
620 nanoparticle suspension (10 mg/ml) by non-surgical intratracheal instillation at gestational day (GD)
621 2.5, 9.5, 16.5, while vehicle alone was injected for the saline group (control). The fetal resorption
622 rate and the number of fetus/litter were not affected, but the fetus weight was decreased at GD 17.5
623 as well as placental efficiency (fetal weight/placental weight). Lung morphometric measurement (at
624 PND 14.5 and 49.5) indicated a decrease in lung alveolar surface in offspring after anatase exposure

625 during pregnancy. TiO₂-NP was significantly higher in the placenta of the treated group. Yet, no
626 inflammatory response was detected in the amniotic fluid, placenta and lungs of fetuses from dams
627 exposed to anatase. Therefore inflammation of dams' lungs did not appear to be the underlying
628 mechanism contributing to lung impairment in the offspring. Decreased pulmonary expression of
629 VEGF- α could be the mechanism leading to impairment of the lung. Other genes involved in lung
630 development such as MMP-9 at the fetal stage and FGF-18 (fibroblast growth factor-18) at the
631 alveolarization stage were shown to be downregulated. Contrary to Ambalavanan et al. (2013), who
632 observed an increased MMP-9 expression in a context of a pro-inflammatory response, a decrease
633 was recorded in the present study.

634

635 In all the studies described above, only a single concentration of TiO₂-NP was investigated and
636 compared to the corresponding controls. Therefore, no dose-response relationship can be
637 established. The results are useful to highlight mechanisms, but not to derive a 8h-OEL.

638

639 **4.6 Sensitive population**

640 Only few studies provide information on potential populations which may be particularly sensitive to
641 TiO₂-NP.

642 Roulet et al. (2012) induced emphysema in rats by instillation of elastase. Seven days after elastase
643 or saline instillation (control), rats underwent intratracheal instillation with TiO₂-NP (100 μ g/rat) or
644 bovine serum albumin (BSA) (0.5 mg/ml). The authors showed that TiO₂-NPs did not aggravate
645 elastase-induced pulmonary inflammation and emphysema. This result suggests that people with
646 lung pathology may not be particularly at risk in case of TiO₂-NP exposure, but this need to be
647 confirmed by further studies.

648 Scuri et al. (2010), as stated in section 3.4.1.4, suggested a greatest sensitivity of young rats
649 (newborn, 1-2 day old and weanling, 2 week old) compared with adults (12 week old), as evidenced
650 by increased in lung neurotrophins, after 3-day inhalation to P25. In contrast, Gate et al. (2017)
651 compared young adults (12–13-week old) and elderly rats (19-month old) in a biopersistence and
652 translocation study (see 3.2) and showed that the amount of TiO₂ recovered in spleen and liver were
653 higher in elderly rats. The study from Disdier et al. (2017) with rats of the same age, also underlines
654 the age susceptibility for a potential neurotoxicity of inhaled TiO₂-NP, with older rat being more
655 susceptible.

656

657

658 **5 Construction of the OELs**

659

660 For the time being, in most of available studies described above, concentrations of TiO₂-NP are
661 expressed in mg/m³. There are currently ongoing discussions on the choice of the relevant dose
662 metrics to use for poorly soluble particle and specifically regarding nanometric forms. Other metrics
663 are currently identified such as surface area, particle number, particle void volume... Indeed, several
664 toxicology studies have suggested that the biological response following deposition of particles in
665 the lung is dependent on particle area, rather than on mass concentration (Oberdorster (2002),
666 NIOSH (2011)). Sager and Castranova (2009) and Noel et al. (2017) compared different exposure
667 metrics after studying different size and agglomeration state (only in the study of Noel et al.) of TiO₂-
668 NP. They confirmed that toxicity is related, at least in part, to surface area. However, regarding
669 pulmonary effects, they also concluded that mass concentration, associated with agglomeration
670 state could be appropriate, as it presents a good correlation with effects observed, and has the
671 advantage of being commonly used and easier to determine. NIOSH (2011) reached similar
672 conclusions.

673 Therefore, given the current lack of consensus on the dose metric to be used, the mass concentration
674 (mg/m³) is retained for the derivation of the 8h-OEL, as it is the most commonly used metric so far.

675

676 **5.1 Construction of an 8 hour occupational exposure limit (8 hour- 677 OEL)**

678

679 **5.1.1 Critical effect**

680

681 From the available repeated-dose toxicity studies in animals, TiO₂-NP can induce adverse effects in:
682 lung (both non-neoplastic and neoplastic lesions), cardiovascular system, brain, liver and kidney.
683 Developmental toxicity (neurotoxicity, impaired microvascular function) is also reported when TiO₂-
684 NP is administered during gestation.

685 Considering all the repeated dose toxicity studies performed by inhalation, the most sensitive effect
686 seems to be lung inflammation, which is observed at concentrations from 2 mg/m³ in rats. More
687 severe pulmonary effects including lung tumorigenesis occurred at higher concentration (≥ 10
688 mg/m³). Effects on other organs are also reported at concentrations higher than 2 mg/m³. For
689 example, effects on the cardiovascular system were noted at 6 mg/m³ but lower concentrations were
690 not tested. Similarly, neurotoxicity and developmental effects were observed at a single tested
691 concentration of 10 mg/m³. Regarding toxicity on the liver and the kidney, the studies identified were
692 all performed by instillation and cannot be adequately compared to inhalation conditions.

693 Based on the available data, lung inflammation is identified as the critical effect after TiO₂-NP
694 exposure. However, most studies only focused on pulmonary response and the few assessing other
695 potential target organs only tested a single high concentration. In this context, it cannot be completely
696 ruled out that other adverse effects can occur at non-inflammatory concentrations.

697

698 ***Interspecies differences from experimental studies***

699 Bermudez et al. (2004) compared the sensitivity of three rodent species to the lung toxicity of P25.
700 The experimental findings suggest that the rat is particularly sensitive to lung toxicity of TiO₂-NP
701 compared to other rodents. Indeed, clear species differences in pulmonary clearance and lung
702 lesions were observed after inhalation exposure to P25 for 13 weeks in rats, mice and hamsters
703 (Bermudez et al. 2004). In particular, pulmonary lesions were more severe and occurred at a lower
704 concentration in rats, which was the only species developing progressive fibro proliferative lesions
705 and alveolar epithelial metaplasia. The differences may be explained, at least partially, by biological
706 diversity of detoxification systems, such as anti-oxidant defences, as described below.

707 Despite a lung burden similar to rats, inflammatory response occurred in mice at higher concentration
708 without developing metaplasia or fibrosis. This lower responsiveness could be explained by a lower
709 sensitivity of this species to oxidative damage compared to rats. For instance, an increase of
710 antioxidant (glutathione) levels in lung tissue was found during particle exposure in mice but not in
711 rats (Oberdorster 1995).

712 In hamsters, the lack of lung adverse effect reported in this study can be related to a more efficient
713 lung clearance system. Indeed, a markedly lower retention lung half-time was noted in hamsters
714 compared to rats and mice. Furthermore, hamsters have antioxidant protection mechanisms
715 different from rats and humans, suggesting that this species is not appropriate for testing particulate
716 substances which may elicit inflammatory oxidative damage (ANSES 2016).

717

718 ***Extrapolation to humans***

719 Regarding general particle mode of action, there are anatomical differences between the lungs of
720 rodents and humans (e.g. lack of well-defined respiratory bronchioles in rats), resulting in different
721 patterns of particle retention. In rats, the deposition of particles is rather uniform and principally
722 observed in the alveolar lumen. In contrast, the deposition of particles in humans is more pronounced
723 at bifurcations in the terminal airways (with observation of hot-spots) and in the interstitium. In
724 addition, it has been shown that lung clearance of particles is slower in humans than in rats by
725 approximately an order of magnitude, with about 60 days in rats (Brown, Wilson, and Grant 2005)
726 and 400 days in humans (Kreyling WG and Scheuch G 2000).

727 Nevertheless, despite these differences, humans and rats display some consistency in response to
728 dust exposure, including inflammatory reaction, lipoproteinosis, fibrosis and hyperplasia. These
729 effects were not reported in mice and hamsters confirming that these species do not appear to be
730 the most appropriate to predict the pulmonary toxicity of TiO₂-NP in humans (NIOSH, 2011).

731 In conclusion, considering:

- 732 - the lack of specific mechanistic data to adequately compare humans to rats and their
- 733 sensitivity to TiO₂-NP exposure;
- 734 - a slower lung clearance of particles in humans compared to rats;
- 735 - similar qualitative lung response to dust between humans and rats.

736 The findings reported in rats with TiO₂-NP (P25) are considered relevant for humans.

737

738 **5.1.2 Choice of the construction hypothesis**

739

740 Carcinogenic chemicals have conventionally been divided into two categories according to the
741 presumed mode of action: genotoxic or non-genotoxic.

742 As stated in the section above (3.3.2), based on the most recent studies, it can be concluded that
743 TiO₂-NP is a weak genotoxic, with effects appearing only at high doses but showing a dose-response
744 in numbers of positive studies. Carcinogenic effects, as evidenced by lung tumours, appear only at
745 high concentrations, associated with altered clearance and inflammatory response (cf. 3.3.3).

746 Genotoxicity data on TiO₂-NP point to secondary genotoxicity as the main mechanism of action.
747 Indeed, several publications suggest a correlation between inflammation and/or oxidative stress and
748 genotoxicity. However, other mechanisms of action cannot be formally disregarded, but data
749 currently available do not allow to demonstrate this. These conclusions are in line with those from
750 other authorities or reviews (IARC, 2010; NIOSH, 2011; Anses 2016; Charles & Jomini et al., 2018;
751 OECD 2018).

752 Weight of evidence is of importance in assessing genotoxicity of a chemical and choosing between
753 the derivation of threshold or non-threshold toxicological reference value.

754 For TiO₂-NP, the majority of positive results are obtained from comet assays. First, many of the
755 available comet assays are in vitro tests for which a harmonized protocol is not currently
756 recommended as such by European legislation, in contrast to studies with validated OECD
757 guidelines that are considered as standard protocols to assess mutagenicity of chemicals. In
758 addition, one of the issues to be considered with comet assay is the biological relevance of results,
759 since this assay measures early DNA lesion that may subsequently be repaired (Charles & Jomini
760 et al., 2018). Applying a weight of evidence approach for genotoxicity, Brusick et al. (2016), reached
761 a similar conclusion by allocating a low weight to "SSB/DSB (single strand break/double strand
762 break) in vitro (including comet)" endpoint.

763 OECD stated that "*When evaluating the mutagenic potential of a test chemical, more weight should*
764 *be given to the measurement of permanent DNA changes (i.e. mutations) than to DNA damage*
765 *events that are reversible"* (OECD 2017). Therefore, positive responses in "indicator" tests (i.e. the
766 measurement of DNA breaks, sister chromatid exchanges, etc.) are certainly associated with
767 exposure but are to be considered insufficient to determine a mutagenic effect.

768 **In summary, based on the available data, a threshold approach is considered to be the most**
769 **relevant approach to derive the reference values.**

770

771 **5.1.3 Choice of the key study**

772

773 Human studies available on TiO₂-NP, all considered as inadequate, do not allow the establishment
774 of a 8h-OEL.

775 In animals, only few studies with repeated exposure are available by inhalation. Repeated-dose
776 toxicity studies conducted by instillation were also found in the literature. As stated in OECD (2018),
777 those studies cannot be used for risk assessment, mainly because this exposure bypassed the upper
778 respiratory tract and is therefore not representative of inhalation exposure.

779 Therefore, among inhalation studies, the one of Bermudez et al. (2004) is selected as the key study.
780 This is indeed the most robust study available by inhalation with the longest duration of exposure
781 (13 weeks). The TiO₂-NP used (P25; 80% anatase/20% rutile; about 21 nm) is one of the OECD
782 reference forms of TiO₂-NP and is fully characterized (OECD 2015). An adequate characterization
783 of the tested material is a critical point considering the wide variety of forms of TiO₂-NP (different
784 products varying in composition, coating, sizing etc.) available on the European market. Since
785 intrinsic physicochemical properties of a nanomaterial, such as particle crystallinity, size, surface
786 area and surface modification, are presumed to influence its reactivity and behaviour, it is essential
787 to have information on these parameters for the tested substance. Moreover, compared to most
788 other studies available, the concentrations used (0.5, 2 and 10 mg/m³) are adequate to observe a
789 dose-response relationship and identify a no-observed effect concentration. Finally, three rodent
790 species were included (mice, rats and hamsters). This feature is very interesting as it allows an
791 assessment of the sensitivity of different species to TiO₂-NP rigorously under the same protocol.

792 However, this study has also some drawbacks:

- 793 • only local/pulmonary toxicity was evaluated with limited details on the results of lung
794 histopathology. This is a critical point in the assessment of TiO₂-NP, as the majority of the
795 repeated-dose toxicity studies available only focused on lung response. No repeated dose
796 toxicity study with a full investigation of various organs, according to OECD guidelines, is
797 available. This limitation of the database is important to keep in mind for the establishment
798 of the 8h-OEL and especially in the setting of the adjustment factors;
- 799 • only females were exposed. However, considering the rest of the database, it is not
800 considered as a major deficiency since a significant variability in the inflammatory lung
801 response between sexes is not expected after TiO₂-NP inhalation as this is a local effect;
- 802 • this study was performed by whole-body inhalation. Nose-only is however the preferred mode
803 of exposure recommended in the Test Guidelines as this mode of exposure minimizes
804 exposure or uptake by non-inhalation routes and thus allow evaluating the particle effect by
805 inhalation only (OECD 2018b). However, in the case of TiO₂-NP, the critical effect identified

806 from the available studies is lung inflammation. Thus, a significant impact of the mode of
807 administration between nose-only and whole-body is not expected. This is confirmed by
808 Oyabu et al. (2016) showing that the difference on pulmonary effects after whole-body and
809 nose-only inhalation of TiO₂-NP is minimal or even non-existent;

810 • P25 was not dispersed (by sonication for example) before exposure. In this context, it is
811 considered that animals are rather exposed to large agglomerate particles instead of free
812 and/or small aggregate particles. However, this protocol can be considered close to real
813 exposure scenario compared to protocols with dispersion of particles.

814

815 Considering all these elements, the study of Bermudez et al. (2004) remains the most reliable study
816 for the establishment of the TiO₂-NP 8h-OEL. It has to be noted that all other repeated-dose toxicity
817 studies performed with several concentrations by inhalation, even if performed on other forms of
818 TiO₂-NP (Oyabu et al. 2017, Ma-Hock et al. 2009, Landsiedel et al. 2014, Yu et al. 2015), support
819 qualitatively and quantitatively the results obtained by Bermudez et al. (2004).

820

821 **5.1.4 Choice of the critical dose**

822

823 Histopathological observations in rats, identified as the most sensitive species, are used as a basis
824 for the establishment of the point of departure. At the tested concentration of 0.5 mg/m³, the only
825 effects reported were a reversible decrease in body weight, the presence of particles within alveolar
826 macrophages and very minimal changes in the patterns of alveolar macrophage accumulation in the
827 lungs. Lesions at 2 mg/m³ were minimal to mild in severity and consisted primarily of particle laden
828 macrophage accumulation and aggregation in subpleural regions and in centriacinar zones,
829 associated with minimal hypertrophy and hyperplasia of type II alveolar epithelial cells. A significant
830 but reversible increase in terminal bronchiolar and alveolar cell replication was also found at this
831 concentration. At 10 mg/m³, there were more severe epithelial proliferative changes, including
832 metaplastic changes in the centriacinar region (bronchiolization of alveolar epithelium) associated
833 with particle-laden macrophage accumulation and increase of inflammation markers in the BALF.
834 The histopathological findings were progressive with increase of concentration and time also after
835 cessation of exposure and decrease in inflammatory response.

836 Based on the increased of cellular proliferation, a Benchmark Dose (BMD) modelisation was
837 performed. Although a dose response was observed, the results of the BMD modelling cannot be
838 accepted because of the low number of animals per dose (n=5) and the large inter-individual
839 variability of the data set.

840 Indeed, several criteria of acceptance of the BMD are not fulfilled (US EPA 2012):

- 841 • the BMD/BMDL ratio is around 10 which means a too large uncertainty;
- 842 • the BMDL is 10 times lower than the minimum non-zero dose;
- 843 • the BMD stands between control and first dose.

844 In conclusion, a BMDL cannot be established based on these data.

845 Based on the abovementioned effects, the LOAEC is established at 2 mg/m³ and the **NOAEC at 0.5**
846 **mg/m³.**

847

848

849 5.1.5 Adjustments

850

851 To reduce the value of uncertainty on toxicokinetics inter-species variability, an allometric adjustment
852 was performed. A Human Equivalent Concentration (HEC) was calculated.

853 The calculation of the HEC for TiO₂-NP, detailed below, has been mainly based on the methodology
854 used by DFG for the derivation of the limit value for the respirable dust fraction of biopersistent
855 granular dusts (MAK 2012).

856 This methodology is based on the assumption that the sensitivity to TiO₂-NP of rats and humans
857 does not differ at the same dose per lung surface area.

858 The first step is the evaluation of the particle fraction deposited in the lung. Deposition fraction is the
859 ratio of number of particles deposited on the lung to the number of particles entering respiratory tract.
860 To estimate this fraction, the Multiple Path Particle Dosimetry (MPPD) model (v 3.04)¹⁶ was used.
861 This model was developed by the Chemical Industry Institute of Toxicology (CIIT), NC, USA, and
862 the Dutch National Institute for Public Health and the Environment (RIVM). The MPPD model
863 calculates the deposition and clearance of monodisperse and polydisperse aerosols in the
864 respiratory tracts of laboratory animals and human adults and children (deposition only) for particles
865 ranging in size from ultrafine (1 nm) to coarse (100 µm). Respiratory tract dosimetry models have
866 been developed for several laboratory animal species including rat, mouse, rhesus monkey, pig and
867 rabbit.

868 The second step is the calculation of the deposition rate, in m³/day:

869
$$\text{Deposition volume} = \text{deposition fraction} \times \text{tidal volume} \times \text{respiratory rate} \times \text{exposure time}$$

870 The elimination constant can be calculated, expressed in days:

871
$$\text{Elimination constant} = -\ln(0.5)/\text{elimination half-time}$$

872 The steady state lung load is calculated, in m³:

¹⁶ <https://www.ara.com/products/multiple-path-particle-dosimetry-model-mppd-v-304>

873 *Steady state lung load = deposition volume/elimination constant*

874 It has to be noted that the steady state load in mg per lung is obtained by multiplying this value by
875 the dust concentration in mg/m³, that is to say the NOAEC.

876 Finally, the lung load related to the lung surface area can be calculated for rats and humans and the
877 ratio of these values is used for the calculation of the HEC by multiplying by the NOAEC:

878
$$HEC = NOAEC \times (steady\ state\ load/lung\ surface\ area)_{rat} / (steady\ state\ load/lung\ surface\ area)_{human}$$

879

880 The calculation of the HEC is presented below along with the graph modelling of the calculations.
881 The details and references of the parameters and data used for calculation, such as options selected
882 in MPPD program, are presented in annex 2.

883

884 **Rat:**

885 • Deposition fraction_{rat}: 0.056 (unitless)

886 • Deposition rate_{rat} = 0.056 x (2.1/1000000) x 102 x 60 x 6 x 5/7 = 0.003084 m³/day

887 *2.1 mL = tidal volume of the rat*

888 *102/min = respiratory rate of the rat*

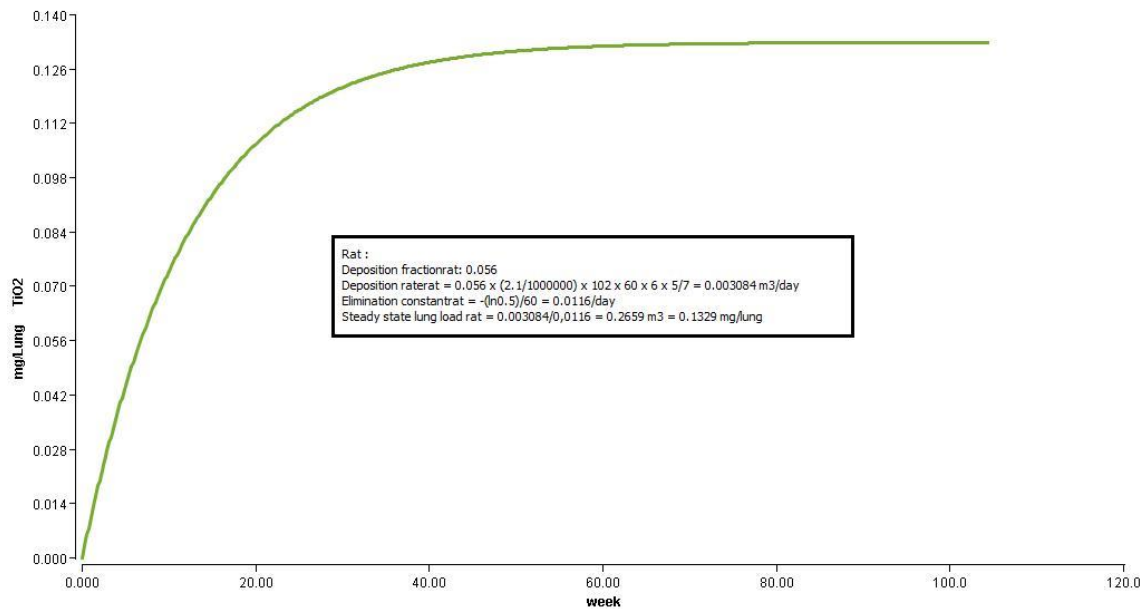
889 *60 min x 6h x 5/7j = exposure time of the study, expressed in days*

890 • Elimination constant_{rat} = -(ln0.5)/60 = 0.0116/day

891 *60 days = elimination half-time of TiO₂-NP for the rat*

892 • Steady state lung load_{rat} = 0.003084/0.0116 = 0.2659 m³

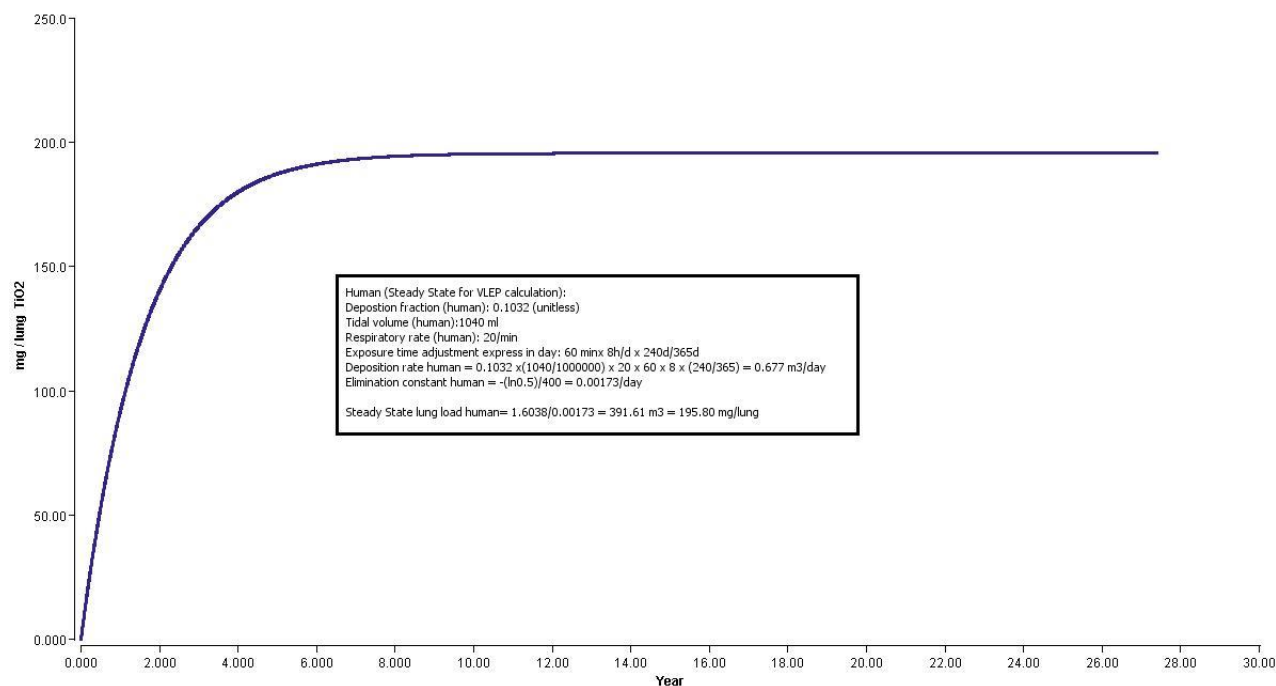
893



894
895 **Figure 2: Modelling of steady state lung load in mg/lung in rats**
896
897

898 **Human:**

- 899 • Deposition fraction_{human}: 0.1032 (unitless)
- 900 • Deposition rate_{human} = $0.1032 \times (1040/1000000) \times 20 \times 60 \times 8 \times 240/365 = 0.677 \text{ m}^3/\text{day}$
- 901 *1040 mL = tidal volume of human*
- 902 *20/min = respiratory rate of human*
- 903 *60 min x 8h x 240/365 = exposure time, expressed in days*
- 904 • Elimination constant_{human} = $-(\ln 0.5)/400 = 0.00173/\text{day}$
- 905 *400 days = elimination half-time of TiO₂-NP for human*
- 906 • Steady state lung load_{human} = $0.677/0.00173 = 391.61 \text{ m}^3$
- 907



908
 909 **Figure 3: Modelling of steady state lung load in mg/lung in humans**
 910
 911

912 **Human Equivalent Concentration:**

- 913 • $\text{NOAEC}_{\text{HEC}} = \text{NOAEC} \times (0.2659/0.297) / (391.61/57.22) = 0.5 \times (0.8953/6.84) = 0.5 \times 0.1309$
 914 $0.297 = \text{lung surface area of rats, in } m^2$
 915 $57.22 = \text{lung surface area of human, in } m^2$
 916 • $\text{NOAEC}_{\text{HEC}} = 0.065 \text{ mg}/m^3$
 917

918 **5.1.6 Adjustment factors**
 919

920 The chronic inhalation 8h-OEL was calculated from the $\text{NOAEC}_{\text{HEC}}$ using the following adjustment
 921 factors (AF) (ANSES, 2017):

- 922 • **Inter-species variability (AF_A) = 3**

923 The allometric adjustment performed by modelling enabled a human equivalent concentration to be
 924 calculated. As provided for in the methodological document, to take toxicodynamic variability and
 925 residual uncertainties into account, an additional adjustment factor was set at 3.

- 926 • **Inter-individual variability (AF_H) = 3**

927 In the absence of quantified data on inter-individual variability, this factor is assigned a default value
 928 of 3.

929 • **Subchronic to chronic transposition (AF_S) = 3**

930 Because the key study was a subchronic study with animals exposed for 13 weeks and no data is
931 available showing that with a longer exposure a lower concentration is not sufficient to induce effect,
932 the value of 3 was used for exposure duration extrapolation.

933 • **Use of a BMDL, LOAEC or NOAEC (AF_L) = 1**

934 Because establishment of the 8h-OEL is based on a NOAEC, this factor does not apply.

935 • **Inadequacy of the database (AF_D) = 3**

936 Most of the studies performed on TiO₂-P25 are not judged fully reliable for chronic risk assessment
937 (e.g. intratracheal administration, single high concentration tested, no chronic study). In addition,
938 several repeated-dose toxicity studies have shown effect on other organs than lungs (cardiovascular
939 system, liver, kidneys...). However, as the majority of repeated-dose toxicity studies by inhalation
940 investigated only one endpoint at the time, it cannot be ruled out that other adverse effects could
941 occur at sub-inflammatory concentrations. In this context, the value of 3 was selected.

942 **A global adjustment factor of 81 is therefore used for the derivation of the OEL.**

943

944 **5.1.7 8h-OEL proposal**

945 The 8h-OEL for TiO₂-P25 is calculated as it follows:

946
$$\text{OEL} = \text{NOAEC}_{\text{HEC}}/\text{AF}$$

947
$$\text{OEL} = 0.00085 \text{ mg/m}^3 = 0.80 \text{ }\mu\text{g/m}^3$$

948

949 This 8h-OEL is only applicable to TiO₂-NP as P25 (80% anatase/20% rutile; 21 nm) which is the
950 substance tested in Bermudez et al. (2004) study.

951 In the present assessment, the relevance of this 8h-OEL to all forms of TiO₂-NP cannot be evaluated
952 considering the presence of more than 350 different TiO₂ products on the European market (varying
953 in composition, coating, size etc., - parameters which are presumed to influence the reactivity and
954 behavior of TiO₂-NP). Thus, it cannot be verified whether P25 is the most potent form and to what
955 extent the data provided are representative for all forms produced, processed and placed on the
956 market.

957

958 It has to be highlighted that 4 adjustment factors are used for the derivation of the 8h-OEL. However,
959 in the reference document for the derivation of OEL (Anses, 2017), it is indicated that "*If all the factors
960 applied exceed 1000 or if in total more than 3 adjustment factors are applied, the key study is
961 considered by the CES as inadequate for the construction of a VLEP*". Accordingly, the 8h-OEL
962 should be disregarded. However, the CES considered that regarding the value of the global
963 adjustment factor of 81, this recommendation of the guidance could reasonably be overlooked for
964 this assessment.

965

966 **5.2 Construction of a STEL (short-term exposure level)**

967 Regarding the lack of relevant data on short term effect of TiO₂-NP for the construction of a STEL,
968 and to limit the magnitude and the number of pic exposure, the CES recommends, according to its
969 methodology (Anses, 2017), not to exceed over a period of 15 minutes 5 times the 8h-OEL, i.e. **4**
970 **µg.m⁻³**.

971

972 **5.3 « Skin » notation**

973 Considering the lack of penetration of TiO₂-NP through skin, as concluded by the SCCS (SCCS,
974 2014), the "skin" notation is not recommended.

975

976 **5.4 « Noise » notation**

977 No available study suggests an ototoxic effect of TiO₂-NP. Consequently, the "noise" notation is not
978 recommended.

979 **6 Conclusions of the collective expert appraisal**

980 **8h-OEL:** 0.80 µg/m³

981 **15min STEL:** 4 µg.m⁻³

982 « **skin** » **notation:** not recommended

983 « **noise** » **notation:** not recommended

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Document for consultation/Document pour consultation

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ANNEXES

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Annex 1: Bibliographic Search

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Study question: Identification of toxicological studies performed with TiO₂-NP.

The ultimate goals of this systematic review are 1) the derivation of a chronic toxicological reference value by inhalation with TiO₂-NP; 2) Identification of toxicological concerns which needs to be clarified (by requesting new studies) during Substance Evaluation in the framework of Reach Regulation.

Description of the review method:

Publications were identified through two databases: PubMed and Scopus®. Secondary literature from IARC, OECD, NIOSH, ECHA, EFSA and SCCS was also taken into account.

The methodology of the review (eligibility criteria and key words) was defined between October and December 2017. The literature search was performed in January 2018. An update of the systematic review was performed in July 2018.

Key words and eligibility criteria for inclusion or exclusion:

The following key words were used for the records identification in the selected database (PubMed and Scopus®):

Identity:

"Titanium dioxide" OR Titania OR "TiO₂" OR "TiO(2)" OR Rutile OR Anatase OR Brookite OR P25 OR "T-lite" OR "Titanium oxide*" OR "TiO₂-NPs" OR Nanotitania OR Nanotitanium OR E171 OR NM101 OR NM102 OR NM103 OR NM104 OR NM105

"Titanium dioxide" OR titania OR "TiO₂" OR "TiO(2)" OR rutile OR anatase OR brookite OR p25 OR "T-lite" OR "Titanium oxide*" OR "TiO₂-NPs" OR nanotitania OR nanotitanium OR e171 OR nm101 OR nm102 OR nm103 OR nm104 OR nm105) AND (ALL ("Ultra Fine" OR nanoscale OR nanomaterial OR "nanoparti*" OR nano OR nanocrystal OR nanosized OR "nanostructure*" OR synthetic OR nanobelt OR nanotube OR "nanofib*" OR "nanolayer*" OR modified OR coated OR "nanocomposite*" OR "functionali*" OR "nanopowder*" OR nanoamor OR nanotechnology OR "nanoadditive*" OR uncoated OR aggregate OR substituted OR agglomerate OR nm100 OR "Food-grade"

Exposure:

"Inhalat*" OR "respira*" OR airway OR nasal OR intranasal OR "intra tracheal" OR instillation OR lung OR chronic OR "pre natal" OR "post natal" OR subchronic OR "repeat*" OR "day*" OR "week*" OR olfactive OR "month*" OR "year*" OR "long term" OR subacute OR "short term" OR "nose only" OR acute OR oral OR gavage OR "drinking water" OR feed OR food OR diet OR "per oral"

36 "in vivo" OR animal OR "cohort*" OR "case control" OR epidemiology OR "review*" OR
37 "chapter*" OR "poster*" OR "experiment*" OR occupational OR longitudinal OR "in vitro" OR
38 cell OR "in silico" OR safety OR evaluation OR corona OR biokinetic OR "ex vivo"

39 *Population:*

40 Child*" OR "worker*" OR "adult*" OR occupational OR "rat*" OR mouse OR "rabbit*" OR
41 "human*" OR "monkey*" OR "dog*" OR hen OR "guinea pig*" OR "animal*" OR "sensitive
42 population" OR painter OR man OR woman OR men OR women OR "manufacturer*" OR
43 asthmatic OR pregnant OR infant OR toddler OR male OR female OR mammalian OR mice
44 OR elderly OR aging OR gestation

45 *Outcome:*

46 Toxicity OR toxicology OR "inflammat*" OR "neurotox*" OR "tumor*" OR neoplastic OR
47 promotion OR cancer OR "oxidative stress" OR "reactive oxygen species" OR "reactive nitrogen
48 species" OR ros OR rns OR fertility OR developmental OR effect OR "genotox*" OR
49 "mutagen*" OR genetic OR aberration OR mutation OR "DNA damage" OR overload OR
50 transformation OR diffusion OR translocation OR clastogenicity OR "micronucle*" OR comet
51 OR "carcinogen*" OR hormone OR thyroid OR reproduction OR tumour OR non-neoplastic
52 OR immunity OR metabolism OR heart OR brain OR lung OR kidney OR "blood barrier" OR
53 "Blood-Brain-Barrier" OR "placental barrier" OR retention OR disease OR "adverse effect*" OR
54 concern OR elimination OR kinetics OR absorption OR "reprotox*" OR safety OR noel OR
55 loael OR loel OR noel OR mitochondria OR nucleus OR threshold OR bmd OR behavior
56 OR reactivity OR benchmark OR hazard OR risk OR spleen OR irritation OR
57 hematoencephalic OR assessment OR placenta OR development OR immune OR epigenetic
58 OR promoter OR chromosome AND stability OR alveolar AND barrier OR injury OR lipid OR
59 crossing OR excretion OR body AND burden OR distribution OR macrophage OR epigenome
60 OR intestinal OR gut OR permeability OR renal

61 Only records published from 2000 were considered because it is generally considered that before
62 this date, the tests often had missing information on the physicochemical characteristics of the
63 testing nanomaterial and/or did not take into account nano-specificity. In addition, publications not
64 written in English or French were excluded. A total of **1888** records were thus identified.

65 The following exclusion criteria were then applied leading to the exclusion of **1643** records based on
66 title and abstract:

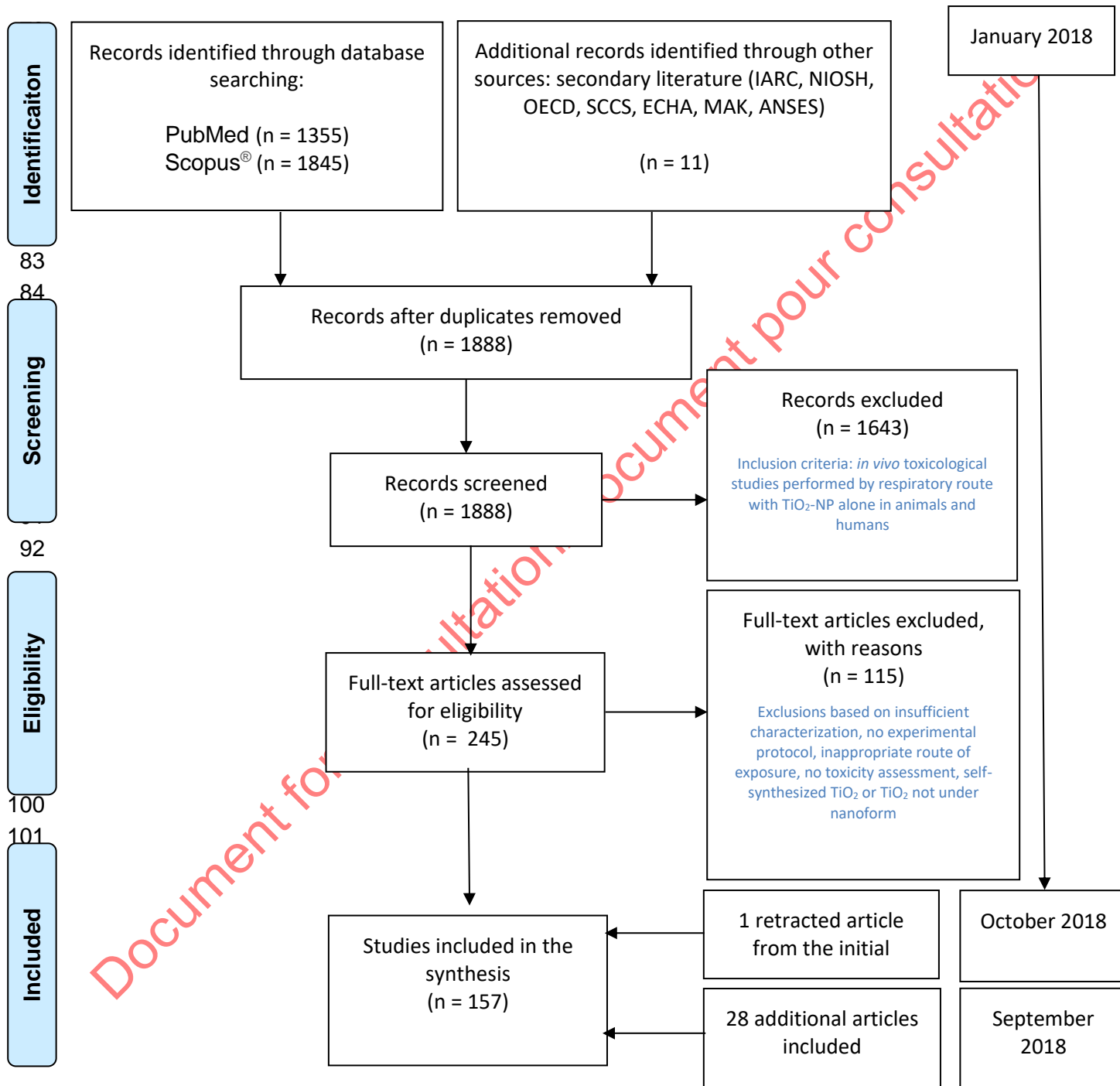
- 67 - Studies not performed with TiO₂-NP alone;
68 - Not toxicological studies (ex. ecotoxicological studies, studies on implants, water disinfection,
69 biotechnology, nanomedicine, analytical method, etc.).

70 In addition, it was decided to only focus the assessment on *in vivo* toxicity of TiO₂-NP by respiratory
71 route. Therefore, only full-text articles complying with this criterion were selected, leading to a total
72 of **245** articles. In addition, in September 2018, **28** further full-text articles were included. Finally, **one**
73 article sorted from the initial bibliographic research was retracted in October 2018.

74 **Methodology quality assessment of included studies:**

75 Among these 266 articles, 157 articles were judged relevant and included in the synthesis.

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Annex 2: Details of parameters used for calculation of OEL

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Information on the use of the MPPD model version 3.04

Parameter	Rat	Human	Reference
<i>Airway Morphometry</i>			
Model	Asymm. Multiple-Path long Evans	Yeh/Schum 5-lobe	/
FRC (ml)	4.0	3300	MPPD default value
URT Volume (ml)	0.42	50	MPPD default value
<i>Inhalant properties – Aerosol</i>			
Density (g/cm³)	4.26	4.26	P25 data, Sigma-Aldrich
Aspect ratio	1	1	/
Diameter (µm)	1.44 (MMAD)	1.44 (MMAD)	Bermudez et al. (2004)
GSD	2.6	2.6	
Inhability adjustment uncheck			Size < 3 µm
Equiv. Diam. Model uncheck			
<i>Exposure condition – Constant exposure</i>			
Aerosol concentration (mg/m³)	0.5	0.5	NOAEC Bermudez et al. 2004
Breathing Frequency (/min)	102	20	MPPD default value
Tidal Volume (ml)	2.1	1040	MPPD default value
Inspiration Fraction	0.5	0.5	Default value
Pause Fraction	0	0	Default value
Breathing Scenario	Whole-Body inhalation	Oronasal – normal augmented	
<i>Deposition/Clearance - Deposition only</i>			

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109 Details and justification of the parameters and data used for calculation of the OEL

110 • Elimination half-life:

111 ○ Rat: 60 days (Brown et al. 2005), confirmed by the results of the Bermudez et al.,
112 (2004) study where an elimination half-life of 63 days was calculated for the
113 concentration of 0.5 mg/m³ for rats.

114 ○ Human: 400 days (Kreyling and Scheuch 2000)

115 • Lung surface area

116 ○ Rat: 57.22 m² (U.S. EPA, 2009)

117 ○ Human: 0.297 m² (U.S. EPA, 2009)

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Annex 3: Minority opinions

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122 Three experts from the HRV Committee expressed a minority opinion and one expert from the HRV
123 Committee abstained on the collective expert appraisal report during the validation of the opinion.

124 Their position is laid out below.

125 “The calculation of the NOAEC_{HEC} of 65 µg.m⁻³ based on the rat NOAEC (500 µg.m⁻³), according to
126 MAK methodology described in the report doesn't seem questionable to us; however, the choice or
127 the justifications used for some adjustment factors are.

128 In particular:

- 129 • an AF_S of 3 was used whereas the NOAEC_{HEC} takes into account:
 - 130 1. the calculation of the lung deposition fraction in human for a 8h/d, 5d/w, 240d/y, life-
131 long exposure;
 - 132 2. the difference in the elimination half-time between human (400 days) and rats (60
133 days);
 - 134 3. the fact that it is based on a threshold effect in the most sensitive species. Indeed,
135 experimental data suggest that the rat is particularly sensitive to pulmonary toxicity of
136 TiO₂-NP compared to other rodent species (mice and hamster), but also to monkey
137 and human (cf § 4.4 of collective expert appraisal)
- 138 • an AF_A of 3 was used while at the steady state of lung load, the sensitivity of the rat,
139 considered as the most sensitive species, and of human is the same for a given dose of TiO₂-
140 NP expressed per m² of pulmonary surface. Moreover, the toxicodynamic variability should
141 be limited compared to soluble compounds or vapours as TiO₂ is almost insoluble.
- 142 • finally, an AF_D of 3 was also used based on the following justification: “it cannot be ruled out
143 that other adverse effects could occur at sub-inflammatory concentrations”. While it is always
144 appropriate to question the overall quality of the database, the current scientific data do not
145 suggest that some effect could occur at exposure concentrations lower than those without
146 observed effects in the lungs. None of the OEL report dealt with so far provided fully
147 exhaustive data on all organs and all biological functions. Therefore, it seems to us that the
148 use of an AF_D of 3 in the present report on the sole basis “it cannot be ruled out” should
149 involve applying the same factor in every OEL and TRV dossier systematically. From our
150 point of view, this appears inappropriate.”

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Annex 4: Follow-up of updates of the report

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Date	Version	Description of the changes
November 2019	01	version for public consultation

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Document for consultation/Document pour consultation