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1 ***Revisiting elimination half live as an indicator for bioaccumulation in fish and terrestrial***
2 ***mammals***

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21 **Abstract:**

22 Current bioaccumulation regulation is focused on bioconcentration in fish. An extension to
23 terrestrial mammals, e.g. rat, is urgently needed but will have to use a different metric, most
24 likely the BMF. While both metrics are thermodynamically not equivalent the regulative
25 testing requirements for both might be reduced to the investigation of the respective
26 elimination rate constants k_2 for fish or rat. These k_2 values could be derived from animal tests
27 or from *in vitro* - *in vivo* extrapolation and could be combined with estimated uptake rate
28 constants to yield either a BCF or a BMF value. The possibility to use *in vitro* methods for k_2
29 has the advantage that animal tests can be avoided and it bears the chance to experimentally
30 cover species differences which are currently ignored in bioaccumulation regulation. Existing
31 data for BCF and the respective k_2 values for fish - either from feeding studies or from BCF
32 studies themselves- indicate that this approach works. For terrestrial bioaccumulation this
33 approach still needs further experimental support.

34

35 **Keywords:** bioconcentration, biomagnification, chemical risk assessment, up-take rate
36 constant, elimination rate constant.

37

38 **1. Introduction**

39 Current regulation on bioaccumulation focuses on the bioconcentration factor (BCF) for fish.
40 However, systematic bioaccumulation assessment should be extended to air-breathing
41 organisms, in particular mammals. The BCF approach itself cannot be extended to terrestrial
42 vertebrates due to the different prevalent uptake pathways and the little value of water as
43 reference phase (Gobas et al., 2009). Instead, the biomagnification factor is often seen as a
44 suitable metric for terrestrial vertebrates. A comprehensive bioaccumulation assessment will
45 need to consider both, the aquatic and terrestrial organisms, which means: a chemical is
46 classified as non-bioaccumulative if bioaccumulation is excluded in both cases. A few years
47 ago, the use of elimination half-life as an indicator for biomagnification in air-breathing
48 organisms was suggested (Goss et al., 2013). A comparable approach is also conceivable for
49 fish and would reduce the regulative testing requirements to the investigation of the
50 elimination rate constant k_2 which is already determined in BCF studies following OECD TG
51 305 (OECD, 2012).

52 The BCF is defined as the steady state concentration of a chemical i in fish divided by the
53 aqueous concentration in the water that the fish is exposed to (while the fish is feeding
54 uncontaminated food).

$$55 \qquad \qquad \qquad (1)$$

56 In the OECD TG 305 (OECD, 2012a) this definition of the BCF is complemented by a kinetic
57 definition which can be derived mathematically from the steady-state approach if one assumes
58 the fish to be a single, well-stirred compartment with instantaneous equilibrium partitioning
59 within the fish and with all uptake and elimination processes following first order kinetics.
60 According to the kinetic approach the BCF equals the first order uptake rate constant divided

61 by the first-order elimination rate constant covering all elimination processes for the
62 considered chemical.

63 (2)

64 Under REACH, a chemical is considered as bioaccumulative if the BCF exceeds a value of
65 2000 (L/kg) for a standardized fish with 5% lipid content. Both, steady-state measurements as
66 well as kinetic measurements are accepted by the authorities. For fish growing substantially
67 during the duration of the test, a growth correction of the experimental data is needed (Brooke
68 and Crookes, 2012).

69 It has been suggested that existing kinetic BCF experiments could be simplified by just
70 measuring the elimination rate while the uptake rate is estimated (Brooke and Crookes, 2012;
71 OECD, 2012b; Goss et al., 2013). The reasoning behind this suggestion is that the uptake rate
72 constant, k_1 , contains mostly information that we are able to estimate rather reliably and that
73 is not chemical specific (Brooke et al., 2012). In their report Brooke and Crookes (Brooke and
74 Crookes, 2012) investigated this approach using a dataset from Jon Arnot
75 (<http://www.arnotresearch.com>) with 169 BCF data points covering 108 chemicals and 14 fish
76 species. They plotted these BCF data versus measured elimination rate constants, k_2 , from the
77 same experiments in a double logarithmic plot and found a linear correlation with a slope
78 close to unity. This is what one would expect when the concept of using estimated k_1 works
79 and if all fish had a similar size (which was not the case). But for unknown reasons Brooke
80 and Crookes did not go the next step to really estimate BCF values based on this approach and
81 based on actual fish sizes as required by the allometric formula for estimating k_1 . Instead
82 Brooke and Crookes (Brooke and Crookes, 2012) came to a rather negative conclusion about
83 this approach apparently because of the rather high scatter in their plot. Interestingly, though,
84 the authors did not consider that part of this scatter came from ignoring the size dependence
85 and another part must have come from uncertainties in the experimental BCF values.

86 The aim of this study was to elucidate whether k_2 values (or elimination half-lives which is
87 equivalent) can be used as an indicator for bioaccumulation in fish. Experimental BCF values
88 from the literature were compared with BCF values calculated for given chemicals using
89 experimental k_2 from the BCF studies and k_1 values estimated according to an allometric
90 scaling formula. Experimental BCF data were further compared with BCF data which were
91 calculated using experimental k_2 from fish feeding studies and estimated k_1 values. Following
92 theory, the uptake path should not matter for the elimination process as long as the well-
93 mixed compartment assumption holds. Therefore, it should be possible to derive BCF values
94 also based on k_2 values from feeding studies. Indeed, this is suggested in the OECD 305
95 guideline from 2012 (OECD, 2012a) for those chemicals that are so hydrophobic that
96 controlled aqueous exposure is difficult (see also (Gobas and Lo, 2016) (Schlechtriem et al.,
97 2017). Interestingly, a validation of this approach has so far not been available.

98 Finally we discuss the possibility of also using elimination half-lives for the bioaccumulation
99 assessment of terrestrial organisms

100

101 **2. Methods**

102 *2.1. Literature search*

103 BCF experiments have been performed for decades and thus many data are available in the
104 published literature. However, in earlier times almost no standardization took place and
105 important experimental parameters were not reported. Hence, there are still data around that
106 are not standardized with respect to lipid content although a standard lipid content of 5% as a
107 reference has been agreed on for a long time. Another important standardization – growth
108 correction- has in fact only become commonly accepted since the latest revision of OECD
109 guideline 305 in 2012. For our first goal, the validation of estimating BCF from a measured k_2

110 and an estimated k_1 , lipid and growth corrected data would have been ideal but this could not
111 be accomplished. The missing lipid correction was less of an issue because both BCF and k_2
112 had been measured for the same fish but in most cases experimental BCF values from the
113 literature have also been reported without any information on fish weight, Hence, we
114 eventually ended up with rather few data that would allow the calculation of k_1 from the
115 allometric formula based on fish weight (see below). Data collection for our second goal, the
116 comparison of k_2 from BCF experiments and from fish feeding experiments was even more
117 difficult. Our first demand was that both data for a given chemical should have been measured
118 for the same fish species because metabolism is known to be species dependent (Schultz and
119 Hayton, 1999; Bischof et al., 2016). In addition data for similar fish size, normalised to lipid
120 content and corrected for growth would have been desirable. The latter demands could not be
121 fulfilled though.

122 *2.2. BCF calculation with experimental k_2 and estimated k_1*

123 A kinetic BCF can be calculated from an experimental k_2 (taken from the BCF experiment
124 itself) and an estimated k_1 . The uptake rate constant, k_1 , is a function of the ventilation rate of
125 the fish and the uptake efficiency of the chemical which is defined as the amount of chemical
126 taken up into the circulatory system of the fish divided by the amount of chemical that was
127 dissolved in the ventilated water. Data measured by (McKim et al., 1985) suggest that the
128 uptake efficiency of rather hydrophobic chemicals (i.e. $\log K_{ow} > 3.5$) is around 60% without
129 much variance between different chemicals. In a recent physiologically based modeling
130 approach (Larisch et al., 2016) we could confirm this by mechanistic reasoning and show that
131 uptake of these hydrophobic chemicals from ventilated water in the gills is independent of the
132 chemical's properties and only a function of the ventilation rate and the fraction of ventilated
133 water that can equilibrate with well perfused lamellae during the rather short residence time in
134 the gills. This fraction of ventilated water volume is called the respiratory volume and

135 amounts to about 60% of the ventilated water volume as determined in a study on rainbow
136 trout (McKim et al., 1985). For less hydrophobic chemicals uptake efficiency is lower
137 because of blood flow limitation (Larisch et al., 2016). Sijm et al. came to very similar results
138 (Sijm et al., 1994; Sijm et al., 1995) in their studies with isolated perfused gills of rainbow
139 trout. These authors suggested an allometric scaling formula with which the uptake rate
140 constants of rather hydrophobic chemicals in fish of various weight can be predicted (Sijm et
141 al., 1995):

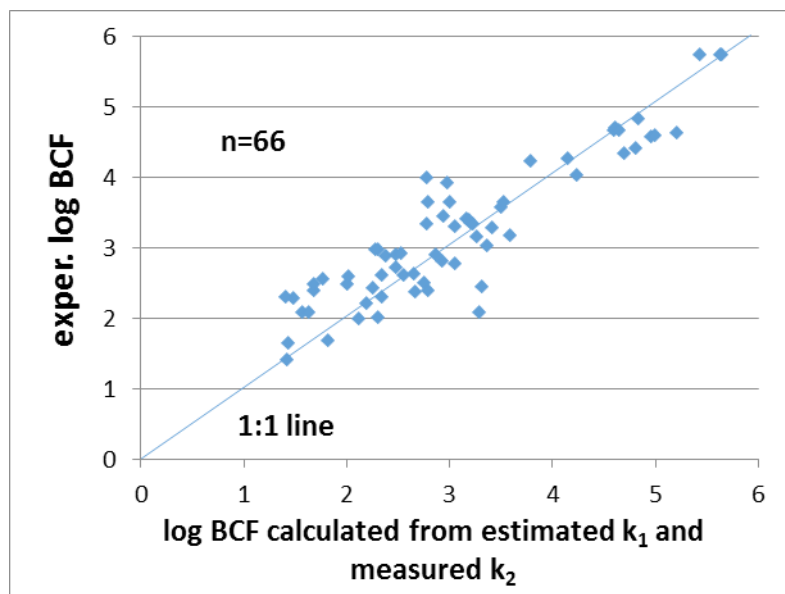
$$142 \quad k_1 = 520 W^{-0.32} \quad (3)$$

143 where k_1 is the uptake rate constant in (L/kg/day) and W is the fish fresh weight in g. This
144 formula is already implemented in the OECD TG 305 on bioaccumulation. Brooke et al.
145 (Brooke et al., 2012) published an overview of a large number of methods for estimating k_1
146 values for uptake via gills in fish and found the method of Sijm et al. to belong to the best
147 performing models in their comparison by (Brooke et al., 2012).. One should note that Brooke
148 et al. concluded that even the best performing methods show a relatively large uncertainty
149 regarding the estimation of k_1 when compared to experimental data which is, according to our
150 impression, at least partly due to a missing standardization of the experimental determination
151 of k_1 .

152 **3. Results & discussion**

153 *3.1 BCF calculation: Experimental k_2 from fish BCF studies combined with estimated k_1*

154 Fig. 1 shows the results of the comparison between experimental BCF values and BCF values
155 estimated with eq. 2 from k_2 values taken from the depuration phase of the very same BCF
156 experiments and estimated k_1 values according to eq. 3. The data represent 10 different fish
157 species and 17 different compounds.



158

159 Fig. 1: Experimental BCF values from literature (SI Table S1) plotted versus BCF values
 160 calculated with eq. 2 using experimental k_2 from the BCF study and estimated k_1 according to
 161 eq. 3 for various chemicals and fish species in a double logarithmic plot (rmse= 0.47 log
 162 units)
 163

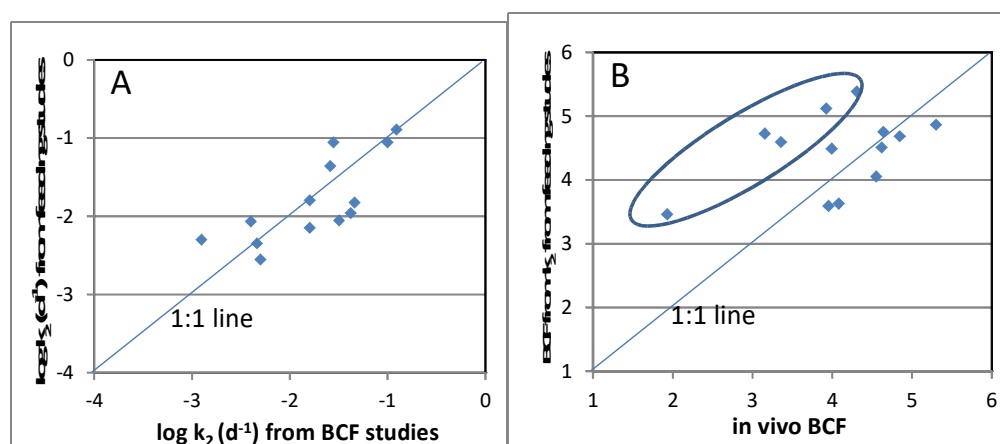
164 We conclude that the method of combining a measured k_2 with an estimated k_1 value gives
 165 good results despite some scatter around the ideal 1:1 line. The scatter is due to the inevitable
 166 experimental scatter in both methods (in vivo BCF and k_2 based BCF) and cannot be taken as
 167 an argument against one of the methods. In fact, the scatter in experimental BCF data
 168 themselves is an inherent problem of the BCF regulation and not a specific problem of the use
 169 of k_2 values as an indicator of bioaccumulation. Evaluation of the Arnot data collection from
 170 (Brooke and Crookes, 2012) shows that BCF data from a single research group on a given
 171 chemical and a given fish species often vary by a factor 2, sometimes more. Data from
 172 different research groups and for different fish species can easily vary up to a factor 10 and in
 173 one case it was a factor 56 (see Table S2 in the Supporting information). This scatter comes
 174 from the use of different species (with possibly different metabolism rate constants), different
 175 fish sizes, missing growth correction and other factors that are not strictly standardized in
 176 BCF tests. The effect of fish size can be exemplified by eq. 3 for the uptake rate constant via

177 gills. According to the allometric formula a 500 g fish will have an uptake rate constant of 70
 178 (L/kg/day) compared to 1400 (L/kg/day) for a fish of 0.05 g. The authors of the recent OECD
 179 draft guidance document on *in vitro* – *in vivo* extrapolation (OECD, 2017a) came up with a
 180 very similar conclusion: “When used to evaluate the validity of *in vitro-in vivo* metabolism
 181 extrapolation efforts, it should also be kept in mind that even high quality experimental BCF
 182 data differ by >0.5 log units for at least 35% of chemicals tested and >1 log unit for at least
 183 10% of chemicals (Nendza et al., 2010) which may result in BCFs values which are below
 184 and above a certain B threshold, e.g., as described for lindane (log BCF ranging from 2.16-
 185 3.32) (Arnot & Gobas,2006). “

186 3.2. BCF calculation: Experimental k_2 from fish feeding studies combined with estimated k_1

187 We have collected literature data for k_2 values from both, fish feeding studies and BCF studies
 188 with only aqueous exposure, for a given chemical and a given fish species and compared them
 189 in Figure 2A. Note that these data are neither growth corrected nor lipid standardized because
 190 in most cases the necessary information was missing. Also in some cases the fish size differed
 191 substantially. Data area averaged from literature data collected in SI Table S3.

192



193

194 Fig. 2 Comparison of k_2 data for given chemicals and fish species but different exposure
 195 scenarios (aqueous exposure and feeding study) in Fig. 2A (rmse = 0.38 log units). In Fig. 2B

196 BCF data from the same aqueous exposure studies are compared with BCF data predicted
197 from k_2 from the feeding studies and k_1 from eq. 3. The outliers are very hydrophobic
198 chemicals (rmse = 0.37 log units without outliers).

199
200
201 It appears that these data support the idea that the type of exposure does not matter for
202 experimental k_2 values. In a next step we have used these k_2 values, combined them with
203 estimated k_1 values according to eq. 3 and plotted the resulting BCF values against those from
204 the aqueous exposure BCF studies (Fig. 2B). Interestingly, in this plot 5 outliers appear. A
205 closer look at the outliers reveals that they are extremely hydrophobic compounds ($\log K_{ow} >$
206 8.0, except for Mirex ($\log K_{ow} = 7.5$)). For the outliers the experimental k_1 is much smaller
207 than expected from eq.3. It has been argued that up-take of such super hydrophobic chemicals
208 in organisms is indeed hindered but we believe that experimental artifacts are a much more
209 likely explanation (see discussion in (Larisch and Goss, 2018) which is in fact the reason why
210 the classical aqueous exposure BCF studies were supplemented by feeding studies for very
211 hydrophobic chemicals, in the first place (OECD, 2012a).

212 *3.3 Advantages of using experimental k_2 values for estimating BCF*

213 Various efforts have been undertaken in the past to reduce the experimental effort needed for
214 a BCF determination (Springer et al., 2008; Adolfsson-Erici et al., 2012; Carter et al., 2014).
215 Using k_2 as the experimental test criterion for BCF in fish is an additional option for
216 simplifying current regulation, because: a) No uptake curve has to be measured. b) Various
217 means of contaminating the fish can be used for a k_2 experiment (provided that the fish is
218 homogeneously contaminated at the start of the clearance experiment) with no need to change
219 the way in which the test results are used or interpreted (see also (OECD, 2012b; Gobas and
220 Lo, 2016)). This is an important feature that has led to the addendum of OECD 305 that
221 allows a fish feeding test for chemicals that are not well water soluble (see above). Note that
222 such fish feeding experiments would result in a bioaccumulation classification inconsistent
223 with the current BCF regulation if they were not evaluated in terms of k_2 as proposed in

224 Annex 8 of OECD 305 but with a dietary biomagnification factor as endpoint (as suggested in
225 an earlier version of OECD 305). See SI-2 for a back of the envelope calculation and (Gobas
226 and Lo, 2016) for additional arguments. Gobas and Lo (Gobas and Lo, 2016) also support the
227 idea of using the k_2 value from a feeding study to estimate a BCF value. However, rather than
228 using an empirical estimation of k_1 they prefer to derive k_1 from the measurement of non-
229 metabolizing reference chemicals. c) The use of k_2 allows further reduction of the
230 experimental effort and the number of test animals if the metabolism rate constant is
231 estimated from *in vitro* tests with hepatocytes or liver S9 fraction (see new OECD draft
232 guideline (OECD, 2017b, c)): The total k_2 is then received by combining the extrapolated
233 metabolic rate constant with estimated rate constants for clearance via gill and feces.
234 Currently, all chemicals that exceed a certain level of hydrophobicity are suspected to be
235 bioconcentrating in fish until animal tests have proven the opposite. In practice, many
236 hydrophobic chemicals turn out to be not bioconcentrating because the chemicals are
237 sufficiently metabolized in fish. If this can be proven reliably by an *in vitro* test, then most
238 animal tests on BCF could probably be avoided in the future. These *in vitro* tests could also
239 present an opportunity to learn more about interspecies variability in BCF (something that is
240 currently not considered in the mandatory animal tests) by using hepatocytes from different
241 fish species. A recent ring test on *in vitro* metabolism studies for 6 chemicals gave promising
242 results in terms of reproducibility of the *in vitro* rate constants (OECD, 2017b, c). We see this
243 as a proof of principle that should now be followed by more studies on the natural variability
244 of *in vitro* data as a function of fish size, maturity, sex and species. Data from Gobas and
245 coworkers (Lo et al., 2015; Gobas and Lo, 2016) indicate that it will also be necessary to
246 account for biotransformation in gastro-intestinal cells in addition to hepatic metabolism if the
247 *in vitro* –*in vivo* extrapolation (IVIVE) method is to become a valid replacement of animal
248 tests.

249 3.4. Bioaccumulation in terrestrial mammals

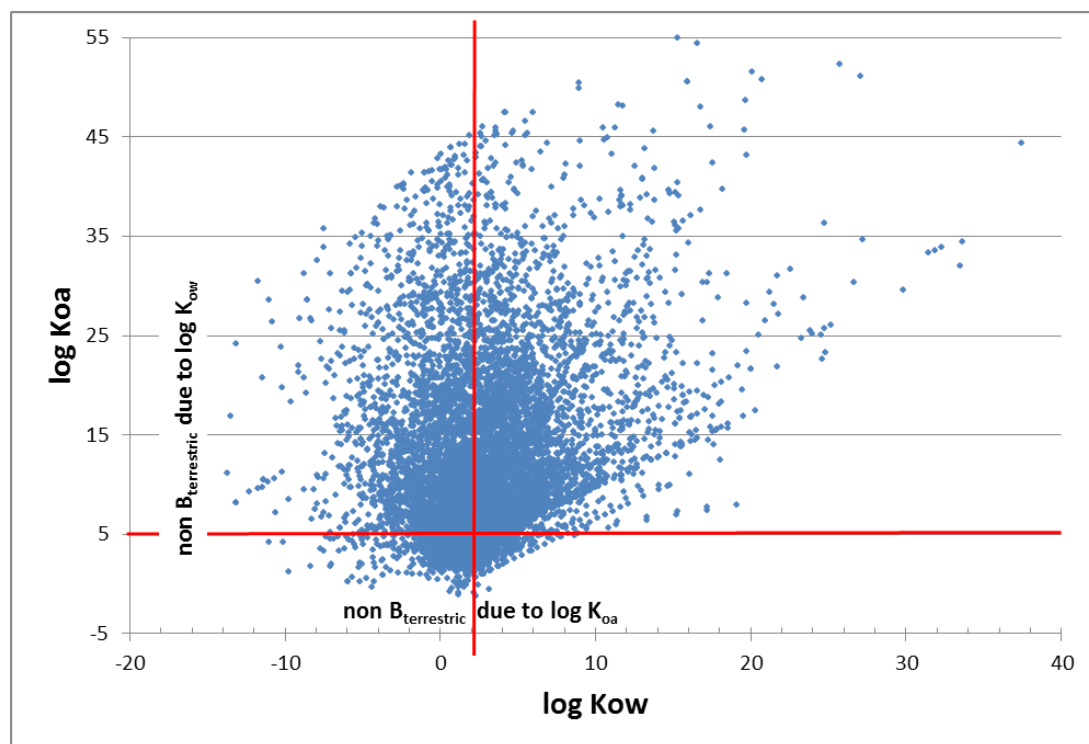
250 Bioaccumulation regulation for mammals should be based on exposure via food which is
251 typically the dominating uptake pathway. Bioaccumulation cannot occur from air (if we
252 neglect transport by particles) because exhaled air has a greater transport capacity for
253 chemicals (because it is warmer) than inhaled air. Accumulation via drinking water is also not
254 relevant due to the small water volume that mammals consume and the low transport capacity
255 of water for not very water soluble and potentially bioaccumulative chemicals. Thus, food
256 typically is the major transport pathway for bioaccumulation in mammals and so it makes
257 sense to use the biomagnification factor (BMF) as the relevant endpoint, which is defined as
258 the steady state fugacity of a chemical in an organism divided by the steady state fugacity of
259 the chemical in its food (Equation 4).

260 (4)

261 Similar to the BCF, the BMF of a chemical i can be described by a simple kinetic approach if
262 the organism is treated as a single, well-stirred compartment and if uptake and elimination
263 kinetics are first order processes.

264 Fish are rather efficient in clearing themselves via the ventilated water (roughly 1000 L water
265 per kg fish and per day (Klyszejko et al., 2003)) based on the physico-chemically driven
266 equilibrium. In contrast, mammals cannot clear themselves effectively from chemicals via
267 physico-chemical partitioning into exhaled air, or excreted urine and feces because the
268 respective sorption capacities of these media are small and their excreted volumes are
269 insufficient for clearance of hydrophobic chemicals. Hence, it has been concluded that
270 chemicals with a $\log K_{ow} > 2$ and a $\log K_{oa} > 5$ would typically exceed the $BMF > 1$ threshold
271 in mammals if no metabolism occurs (Gobas et al., 2003; Czub and McLachlan, 2004;
272 Armitage and Gobas, 2007; Kelly et al., 2007; Goss et al., 2013). A physico-chemical
273 screening of chemicals based on these screening criteria will leave many more suspect
274 chemicals for terrestrial bioaccumulation than it does for aquatic bioconcentration (Gobas et

275 al., 2003). Fig. 3 shows the screening results for some 10 000 neutral chemicals from the
276 Canadian Domestic Substances list (note: a very similar figure has been presented in (Gobas
277 et al., 2003)). All chemicals (roughly 5000) in the upper right box would be classified as
278 potentially bioaccumulative in mammals and would have to undergo some kind of
279 experimental testing.



280

281 Figure 3: log K_{ow} and log K_{oa} for all neutral chemicals from the Canadian Domestic
282 Substances List calculated with EPISuite (based on data reported in Wittekindt & Goss, 2009)
283

284

285

286 3.5. Testing bioaccumulation in terrestrial mammals

287 Currently there is no test guideline on mammalian bioaccumulation. In fact, any new

288 guideline that would involve additional animal tests with mammals would be highly

289 controversial for ethical reasons and also cost-prohibitive. For chemicals in commerce, field

290 studies may be helpful, but they cannot easily be standardized and interpreted (van den Brink
291 et al., 2016). For new registrations “Repeated Dose Oral Toxicity Study in Rodents” are
292 mandatory under the current REACH regulation. These tests last 28 days (tonnages > 10 t /
293 year) or 90 days (tonnages > 100 t / year) (OECD guidelines 407, 452 or 453). These studies
294 could also be utilized to investigate the bioaccumulation behavior of the studied chemicals.
295 While these studies are currently not designed to provide steady-state concentrations in rat,
296 they could certainly be extended in this direction. This would require additional analytical
297 efforts to analyse the sacrificed animals at the end of the experiment and it would require
298 additional analytical effort to document the time course of the internal concentration of the
299 chemicals during the experiment. For the latter one would preferably use blood samples from
300 the test animals without sacrificing additional animals. While an adjustment of the “Repeated
301 Dose Oral Toxicity Study in Rodents” might provide helpful bioaccumulation data for
302 selected chemicals on the long run (when all stakeholders have agreed on and validated an
303 updated guideline) it is hard to see how this could quickly help to assess the mammalian
304 bioaccumulation potential of thousands of chemicals.

305 *3.6. In vitro-in vivo approach for estimating BMF in rat*

306 Similar to the BCF one can estimate the uptake rate constant of a chemical from food in a
307 mammal fairly well by combining the known feeding rate with an up-take efficiency of 100%.
308 This is a worst case assumption but also pretty close to realistic values (Moser and
309 McLachlan, 2001; Kelly et al., 2004; Thomas et al., 2005). Hence, the main unknown quantity
310 that remains to be tested experimentally in order to derive a kinetic BMF value is the
311 clearance rate constant k_2 . Note that due to the different allometric scaling of the rates of
312 feeding, urination, fecal excretion etc. a BMF <1 threshold would actually translate into
313 different k_2 -values for different animals. Therefore, a k_2 value as such is not suitable as a
314 bioaccumulation threshold. However, the BMF itself depends less on allometric effects

315 because these allometric effects influence uptake and elimination rate constants in a similar
316 way so that their influence on the BMF value of a chemical tends to cancel (Goss et al., 2013).
317 We can thus expect that BMF values of a given chemical in different species tend to be the
318 same as long as their metabolism capability is not fundamentally different. This is
319 supported by experimental data that were assembled in (Goss et al., 2013).

320 Also in this case it is appealing to think of an *in vitro- in vivo* extrapolation approach in order
321 to derive experimental information on metabolism that is missing in the Tier 1 assessment. *In*
322 *vitro* metabolic information from fish has been shown to be different from that for mammals
323 and can therefore not be used for mammals (Han et al., 2007; Weisbrod et al., 2009). But in
324 pharmaceutical science the use of *in vitro* assays with mammalian hepatocytes is a standard
325 procedure (Pelkonen et al., 2009; Dvorak, 2016) and we expect that this could also become
326 part of a BMF assessment. The half-lives that need to be covered by such *in vitro* tests are
327 different though between fish and rat. For fish the critical elimination half-life is around 3.3
328 days (see section 2.2). Based on *in vitro-in vivo* extrapolation we can conclude that the *in-*
329 *vitro* test for fish should cover half-lives of 1 - 2 hours at the most in a typical assay set up
330 with $2 \cdot 10^6$ hepatocytes/ml assay in order to account for metabolic rates that can efficiently
331 reduce bioconcentration. For a rat a rough calculation gives a different result: if we assume
332 that a rat would typically have a daily feeding rate of 4 % of its body weight and that its food
333 has the same fugacity capacity for the investigated chemical as the rat itself, and if we further
334 assume an uptake efficiency of 100 % from the food then we can estimate an uptake rate
335 constant k_1 for a rat of $0.04 \text{ kg}_{\text{food}}/\text{kg}_{\text{rat}}/\text{day}$. From this uptake rate constant we can conclude
336 that an elimination half-life of 17 days would still suffice to keep the corresponding BMF
337 below the threshold of 1 in rat (Goss et al., 2013). This would mean that an *in vitro* assay with
338 rat hepatocytes should cover half-lives up to 8 h because these would still be relevant for the
339 BMF assessment, rather than 1-2 hours for fish. Such long half-lives cannot be covered by
340 typical hepatocyte assays. Hence, additional *in vitro* methods for measuring longer half-lives

341 may be needed. Another difference in applying the *in vitro* – *in vivo* method to terrestrial
342 organisms is that first pass effects can become important for oral uptake. For a worst-case
343 assessment such effects can be ignored because they lower bioaccumulation. For a more
344 precise assessment, data evaluation based on the simple one-compartment models that are
345 currently used in the IVIVE scheme for BCF (Weisbrod et al., 2009) is not sufficient. Instead,
346 multi-compartment modelling should become the standard for assessing terrestrial
347 bioaccumulation from *in vitro* methods. And similar to fish it might improve the overall
348 accuracy of this approach if the *in vitro* method would also cover biotransformation in other
349 tissues than the liver.

350 A direct validation of such an *in vitro-in vivo* approach for estimating BMF in rat will not be
351 possible due to missing BMF experiments with rat so far. However, a comparison between
352 modelled and experimental toxicokinetic data in rat for chemicals with known *in vitro*
353 metabolism rate constants might show whether our toxicokinetic understanding is sufficient to
354 also predict the steady-state situation described by the BMF.

355

356 **4. Conclusions**

357 The quality and comparability of experimental BCF values from the literature may be by far
358 not as good as implied in many discussions. Therefore, care must be taken not to use (low
359 quality) BCF values from the literature as “the gold standard” against which every innovation
360 suggested to further improve bioaccumulation assessment is compared.

361 Experimental k_2 values from aquatic or terrestrial animal tests can be combined with
362 estimated uptake rate constants from water and the diet to yield BCF or BMF estimates,
363 respectively. This is irrespective of the exposure scenario that led to the starting point of the
364 depuration study. Ionic species were not considered in this study and need to be discussed

365 separately. While the general requirements from the BCF or BMF regulation should also hold
366 for ionic chemicals, the details of uptake and elimination processes are different for ions than
367 for neutral chemicals (e.g.(Rendal et al., 2011)).

368 Standardized experiments for BMF in mammals do not exist yet. The “Repeated Dose Oral
369 Toxicity Study in Rodents” which is already required under REACH could be adjusted and
370 complemented by some chemical analysis in order to fulfill this purpose. *In vitro* generated
371 metabolic rate constants may have the potential to reliably indicate whether metabolism of a
372 chemical may be efficient enough to prevent bioaccumulation and they may also provide us
373 with a better understanding of the effect of biological diversity on bioaccumulation when
374 assays use hepatocytes from different animals belonging to different age groups, sex, size,
375 species and so on. In fact, if one combines such diverse *in vitro* information not only with a
376 simple 1-compartment model for an organism but with a multi-compartment PBTK model for
377 various exposure scenarios then one has the chance to generate much more relevant
378 bioaccumulation information than any single standardized animal test ever could.

379

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384

385

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