

Impact of RNAi products on mammalian health

Food stories and food facts

Kenneth W. Witwer, PhD

The Johns Hopkins University School of Medicine
Department of Molecular and Comparative Pathobiology
Retrovirus Laboratory



6 July, 2015



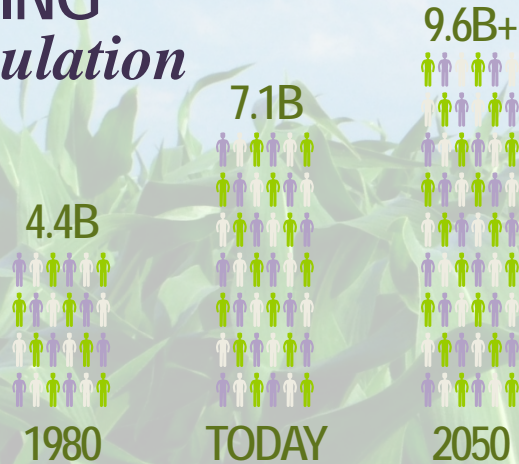
THE RETROVIRUS LABORATORY

Why GM crops?

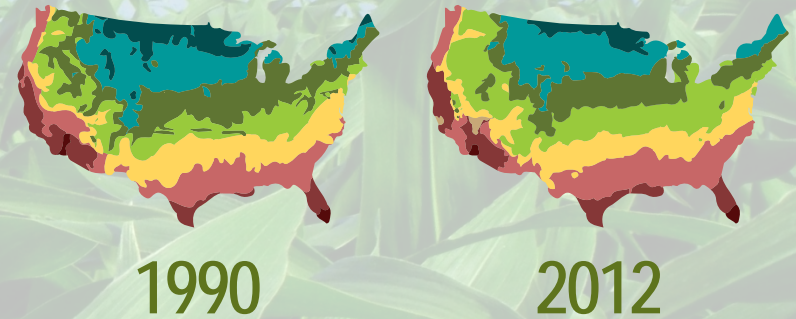
Why the strong interest of the US
EPA, EFSA, other regulators?

We Will Need to Grow as Much Food in the Next 50 Years as in the Past 10,000 Years Combined

RISING population



CHANGING climate



DECLINING arable land

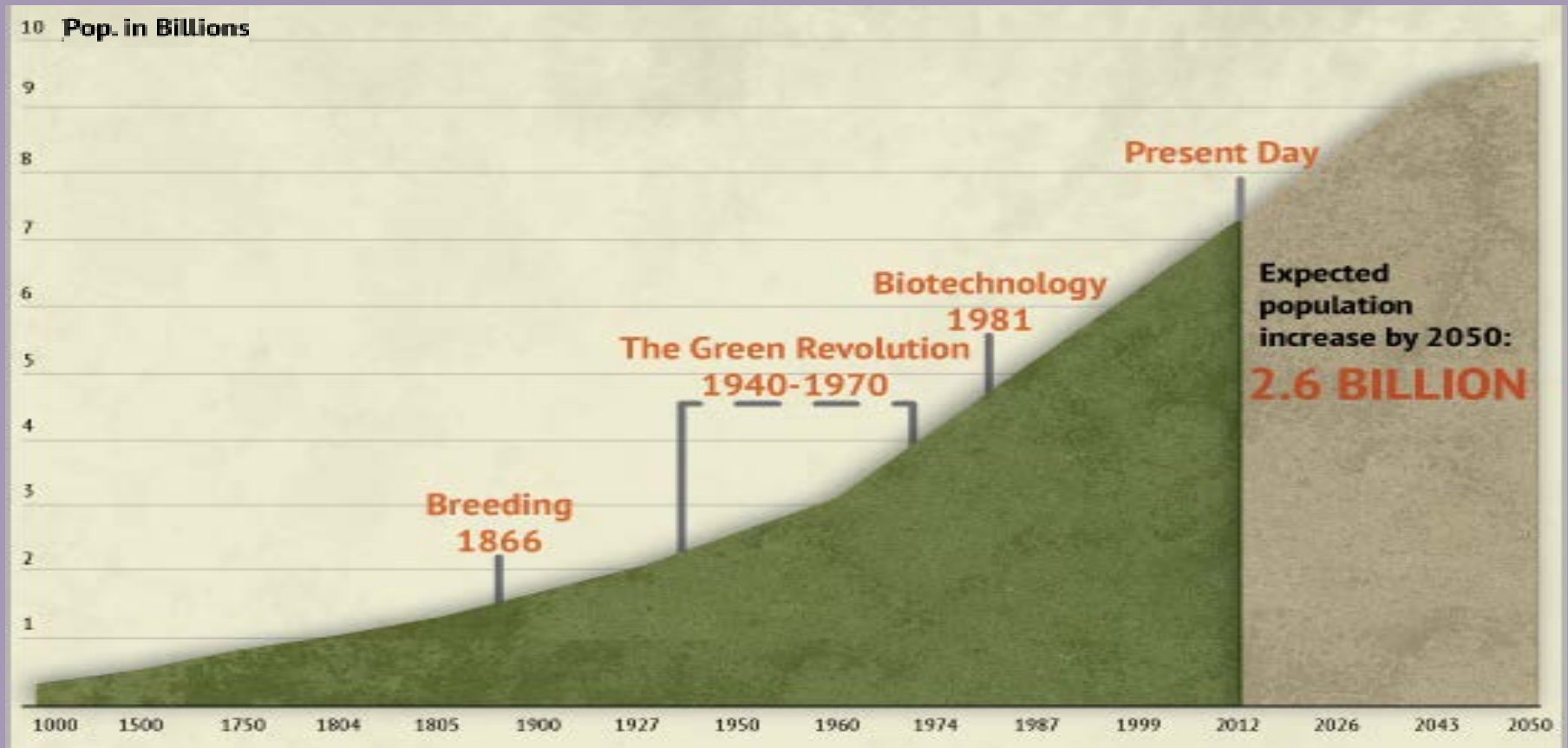


CHANGING economies & diets



DIETARY PERCENTAGE OF MEAT

History Shows Us that Advancements in Technology Have a Huge Impact on Agriculture



The rate of population increase exceeds the rate of increase in food production

-Dr. Normal Borlaug

CROP BIOTECHNOLOGY

is an extension of plant breeding

1700's

Farmers and Scientists cross-bred plants for new traits

1940's

Researchers used mutagenesis to alter the genetic makeup of seeds.

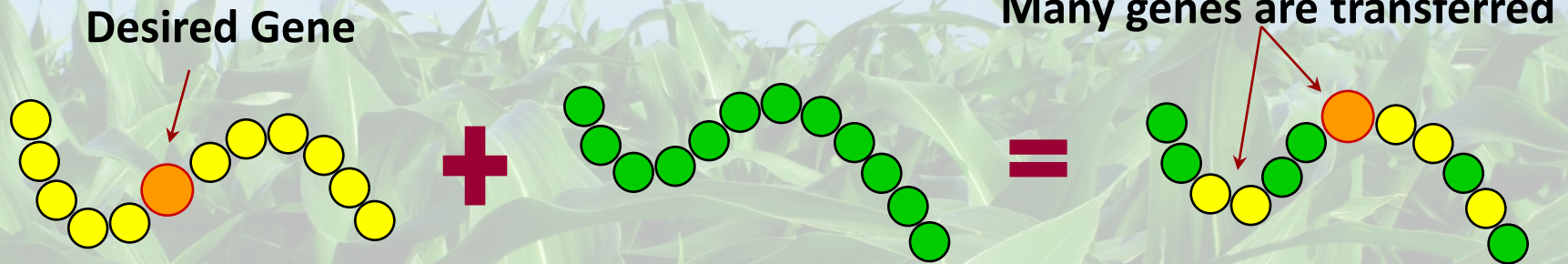
1970's

Scientists begin to use molecular techniques to precisely modify plants.

BIOTECHNOLOGY IN AGRICULTURE HAS BEEN RESEARCHED FOR OVER 30 YEARS AND GROWN COMMERCIALY FOR 18 YEARS

Crop Biotechnology is an Extension of Traditional Plant Breeding

TRADITIONAL PLANT BREEDING



PLANT BIOTECHNOLOGY



Biotechnology is Used in Many Common Products

CHEESE



Nearly all cheese is produced using rennin produced through biotechnology, instead of naturally occurring rennin, extracted from calf stomachs.

YEAST



Unique flavors are created through biotechnology engineering of yeast varieties, for use in beer brewing and bread making.

MEDICINE



Most insulin used by diabetics is produced using the human DNA sequence of insulin through biotechnology, rather than extracting insulin from the pancreas of pigs or cows.

Genetic biotechnology

- **Mutation of an existing gene**
- **Removal of a gene**
- **Introduction of a new gene**
 - **From a different strain or close relative**
 - **From a distant organism**
- **Use of noncoding RNA regulation**

“Rainbow” Papaya: RNAi-based GM



- Papaya ringspot virus a major economic problem
- 1992: field trials started in Hawaii
- 1998: licensure, cultivation
- Pathogen-derived resistance—coat protein gene
 - Actually RNAi

Plum pox virus (PPV)

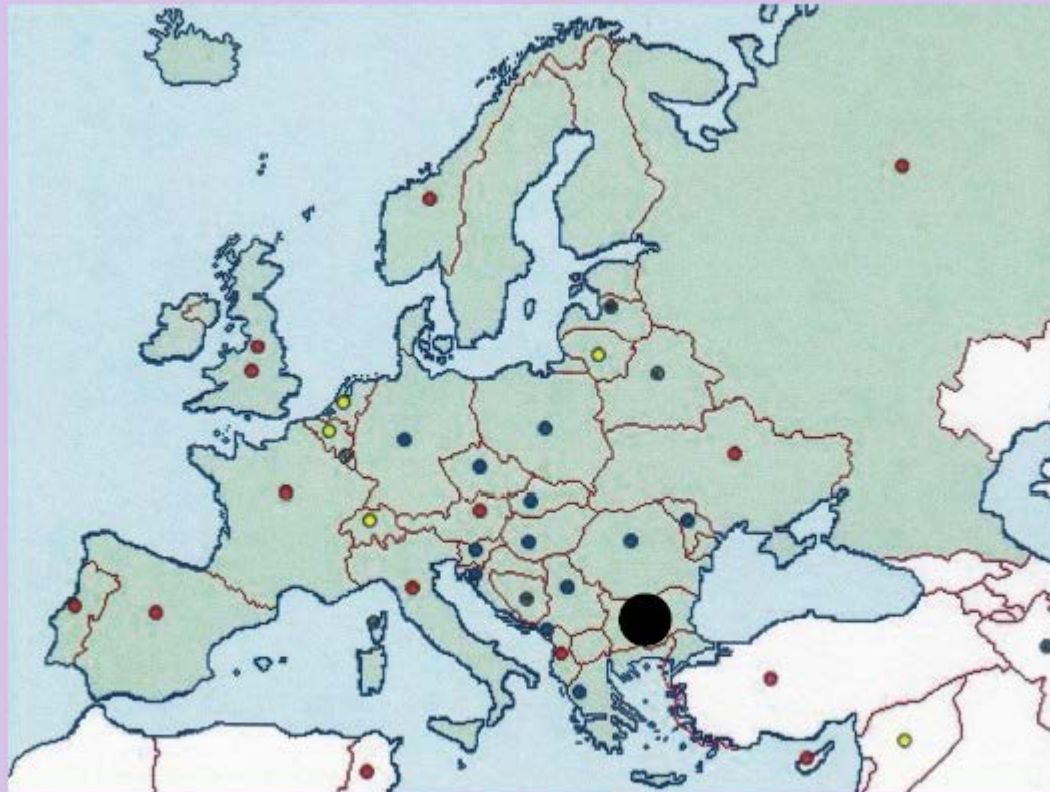


Sharka (*Plum pox virus*)



Source: Ralph Scorza

PPV SPREAD – EUROPE



- widespread
- localized
- occasional reports

<http://www.cabi.org/isc/datasheet/42203>

PPV infection in selected European countries:

Bosnia-Herzegovina - **41%** of plum trees infected

Croatia - **51%** plum trees infected

Serbia - **58%** plums infected with PPV

Bulgaria - **62%** infection in plums

Romania – **69%** infection in plums



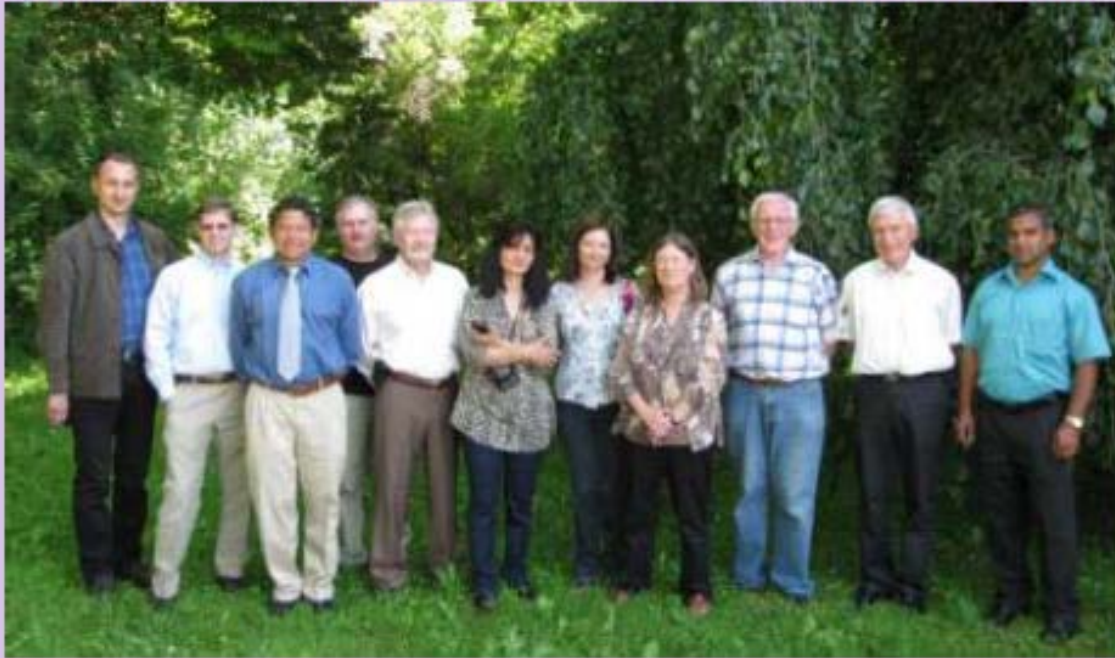
Moldova - plum yield losses plum are **16-48%**

Greece – apricot production decreased from **35% to 13%**
of world production due to PPV

Spain - **2.3 million** PPV-infected trees removed between 1989 and 2006
at a cost of over **63 M Euros**

2006 OEPP/EPP 36 (2)
Zagrai et al UASMV 67 2010

International 'HoneySweet' Working Group



- 'HoneySweet' co-developed by U.S. and European team
- Field tested in Europe for over 17 years
- Solely the work of publicly-supported scientists, at public research institutions
- For the benefit of growers and consumers

Ralph Scorza

Corn and corn rootworm: RNAi

Control of Coleopteran Pests Through RNA interference

James A Baum, Thierry Bogaert, William Clinton, Gregory R Heck, Pascale Feldmann, Oliver Ilagan, Scott Johnson, Geert Plaetinck, Tichafa Munyikwa, Michael Pleau, Ty Vaughn & James Roberts



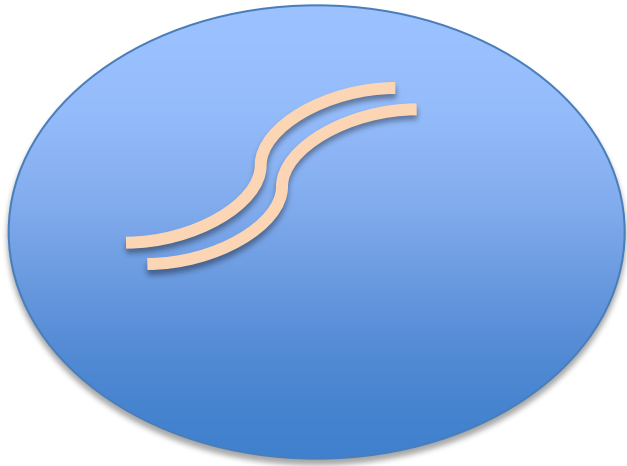
November 2007, Volume 25 No 11 pp1117-1328

Western Corn Rootworm
Coleoptera: Chrysomelidae:
Diabrotica virgifera virgifera

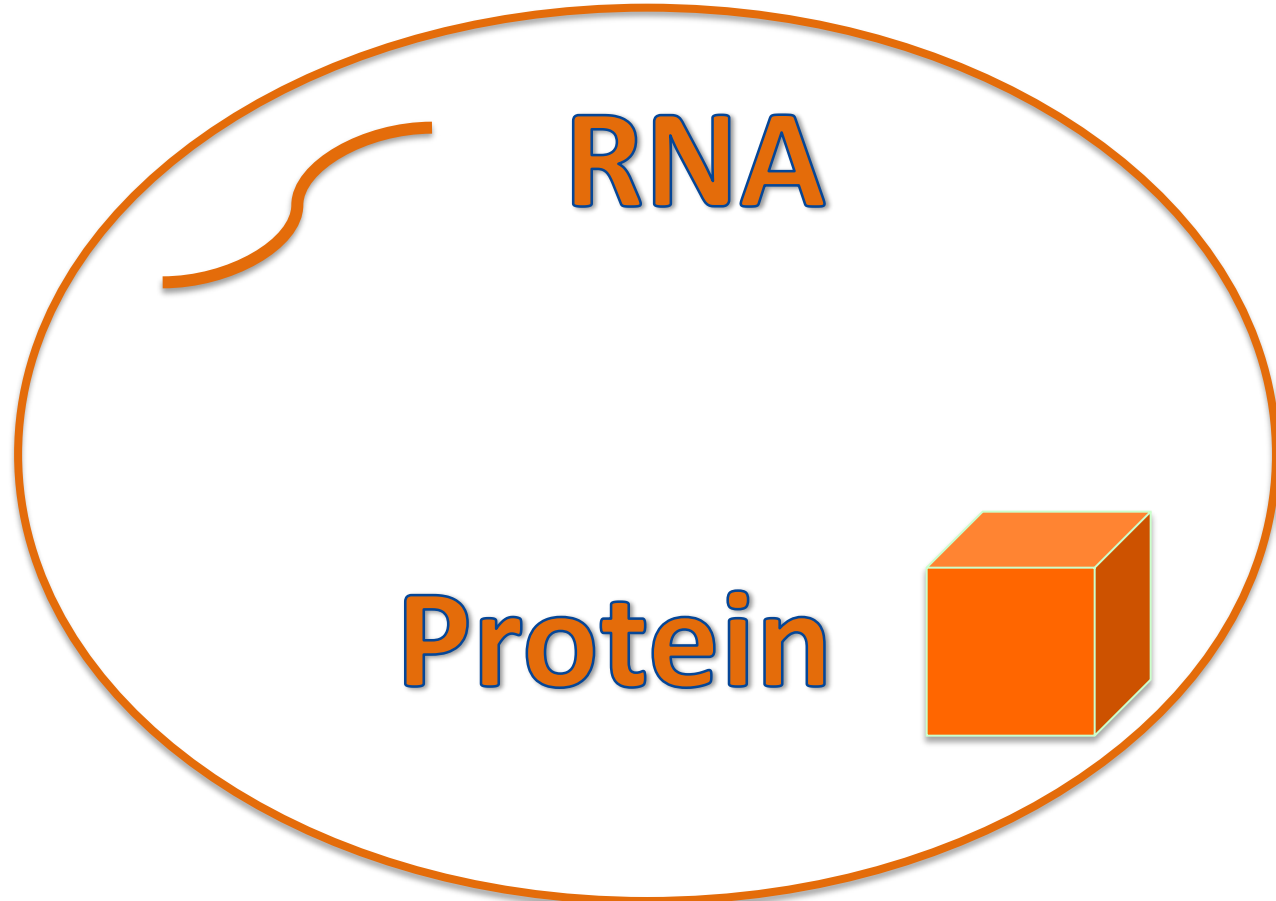
Non-transgenic corn Transgenic corn



What is RNA interference?



DNA



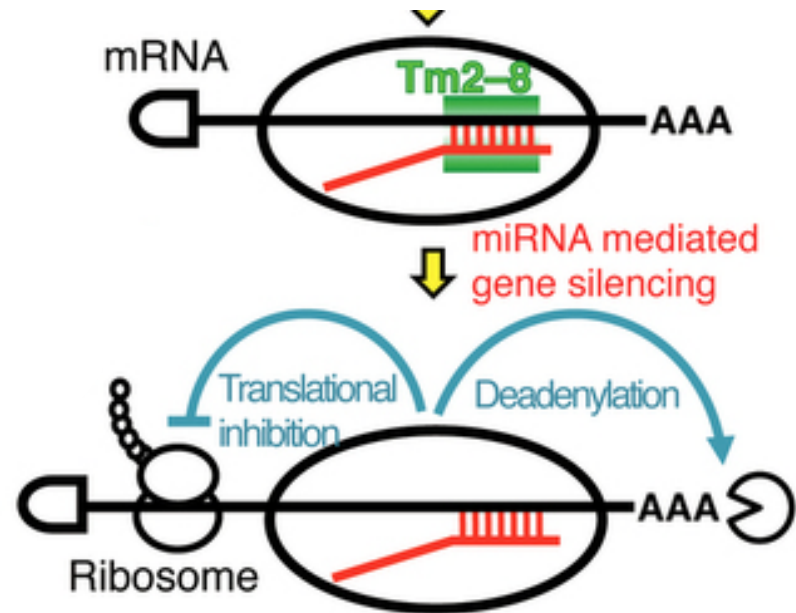
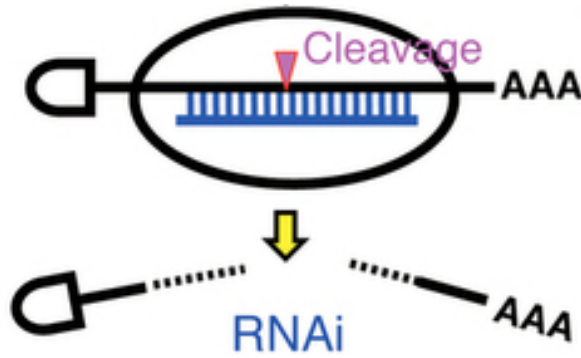
RNA

Protein



RNA interference

siRNA

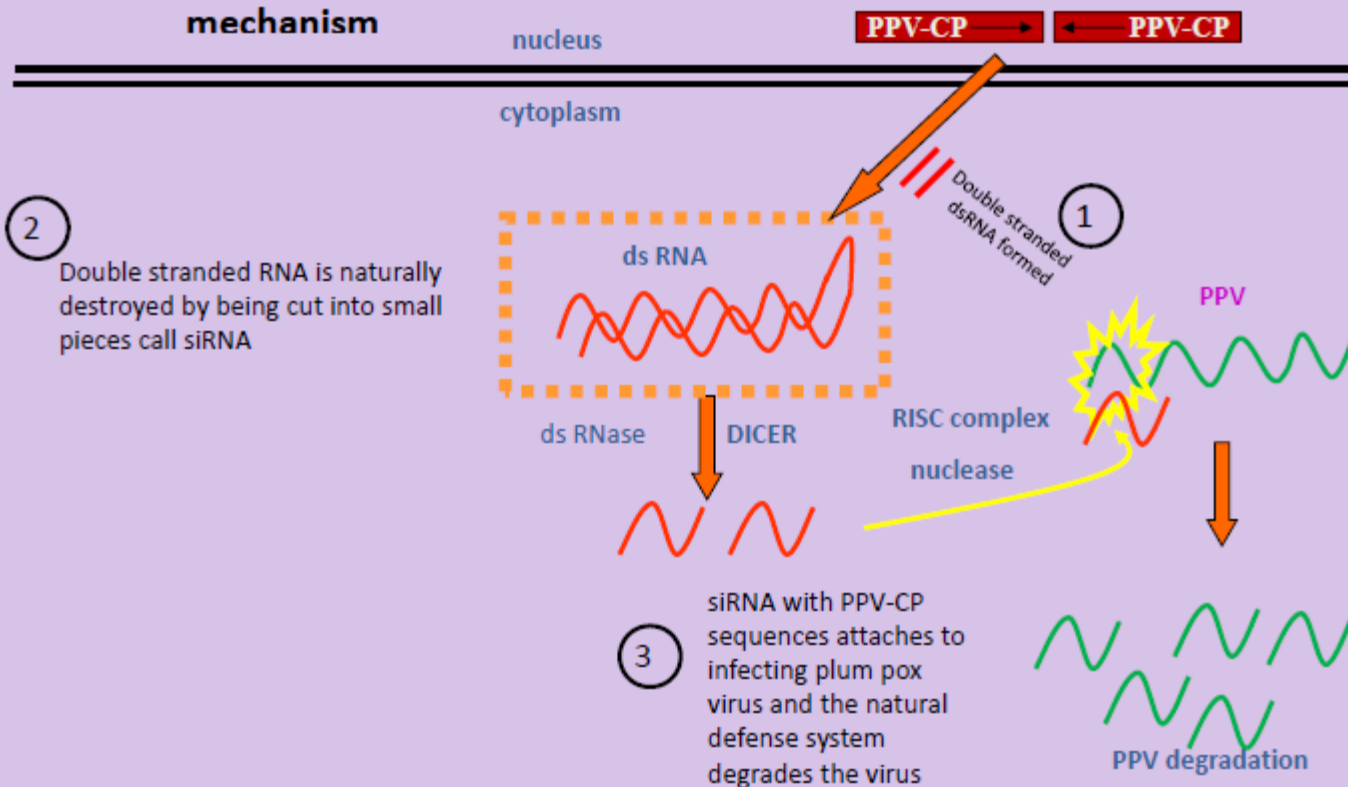


miRNA

HONEYSWEET PPV RESISTANCE IS RNAi-BASED

Pathogen derived resistance
through RNA silencing
A natural virus resistance

An inverted repeat of the PPV-CP gene (hairpin) formed naturally, likely during Agro-mediated insertion



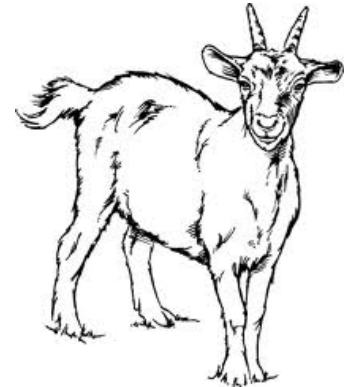
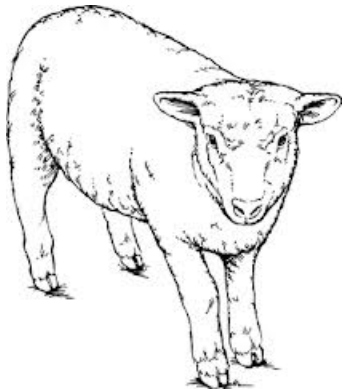
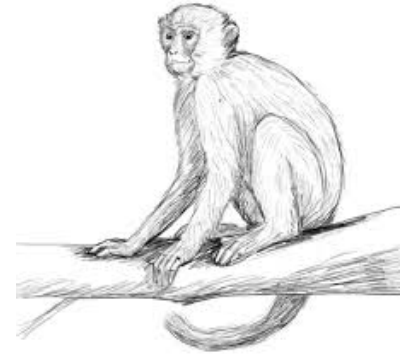
Why would a virologist care about
small noncoding RNAs?



THE RETROVIRUS LABORATORY

The Johns Hopkins University Molecular and Comparative Pathobiology Retrovirus Laboratory

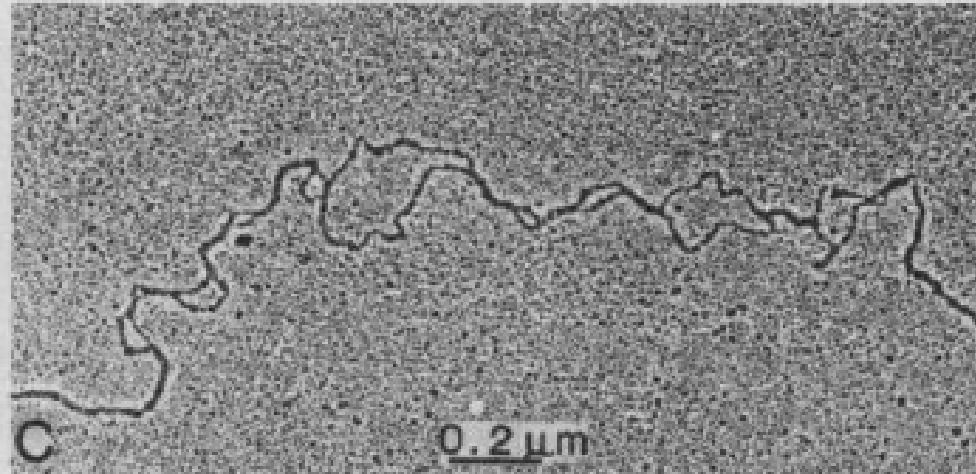
Director: J.E. Clements
Lentiviruses and animal models
of HIV disease



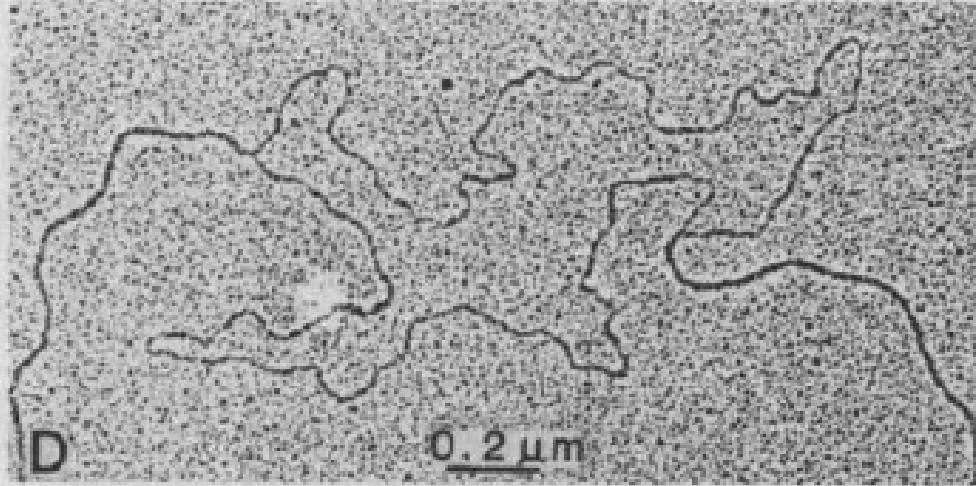


THE RETROVIRUS LABORATORY

+



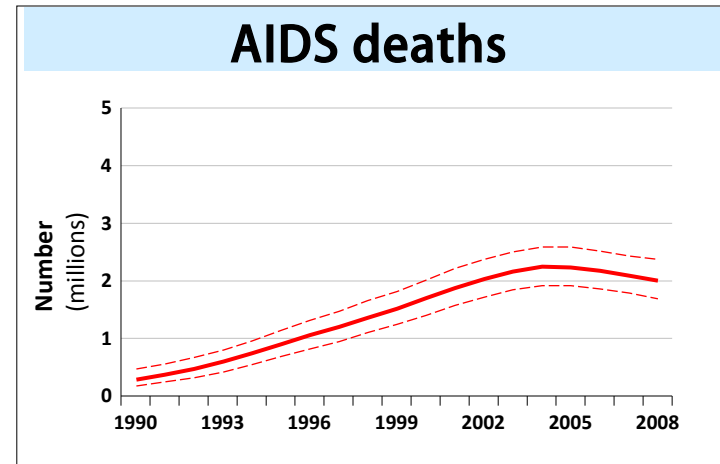
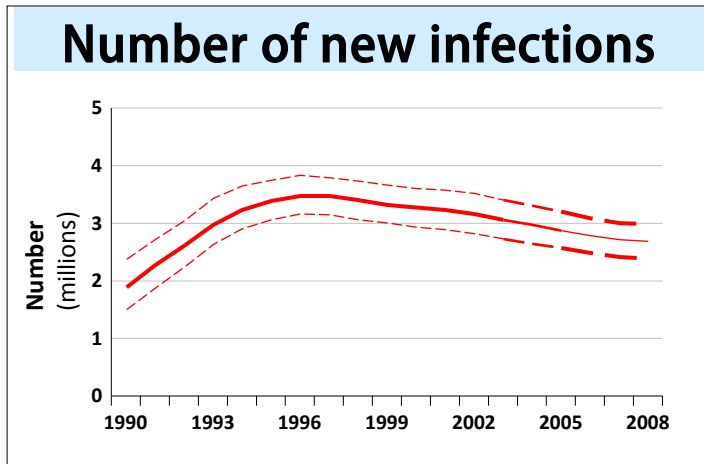
-



Gonda, et al. Science, 1985

HIV/AIDS: progress...and cure?

Source: UNAIDS/WHO



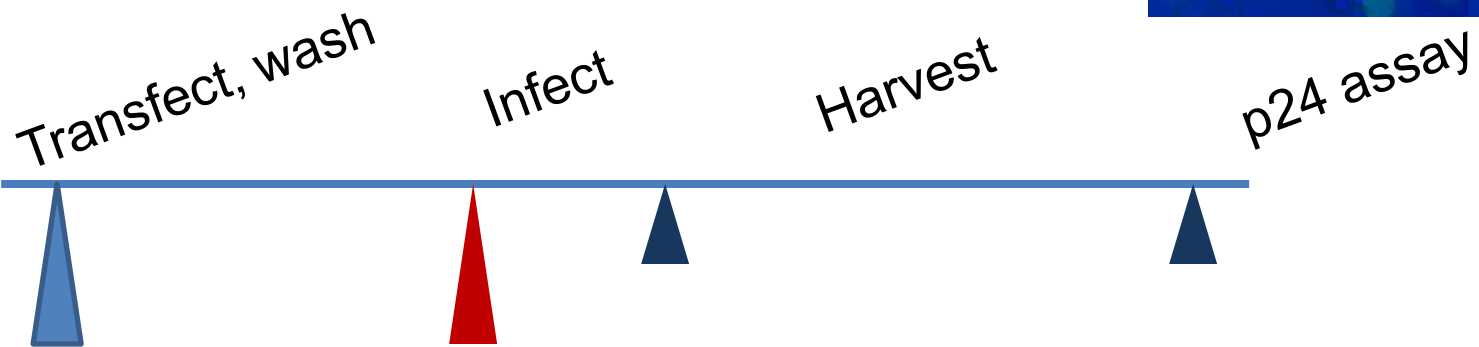
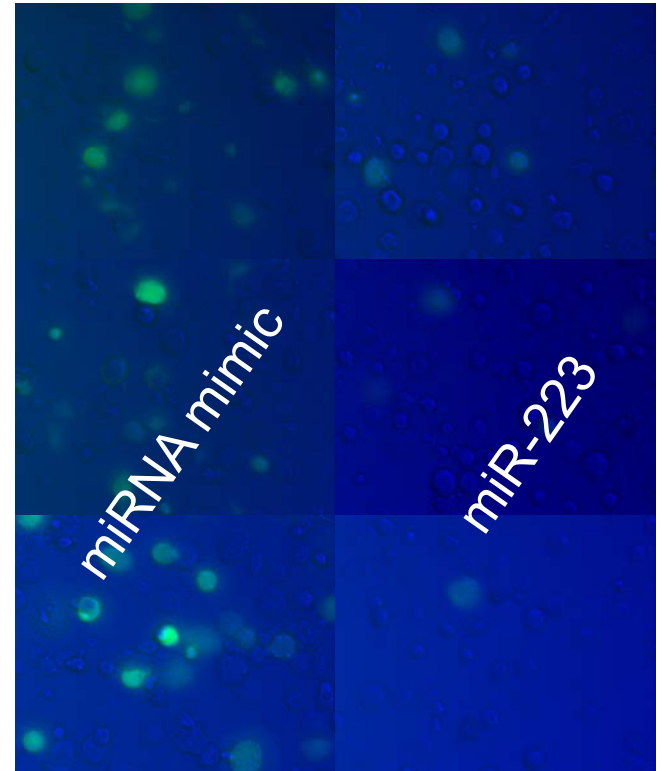
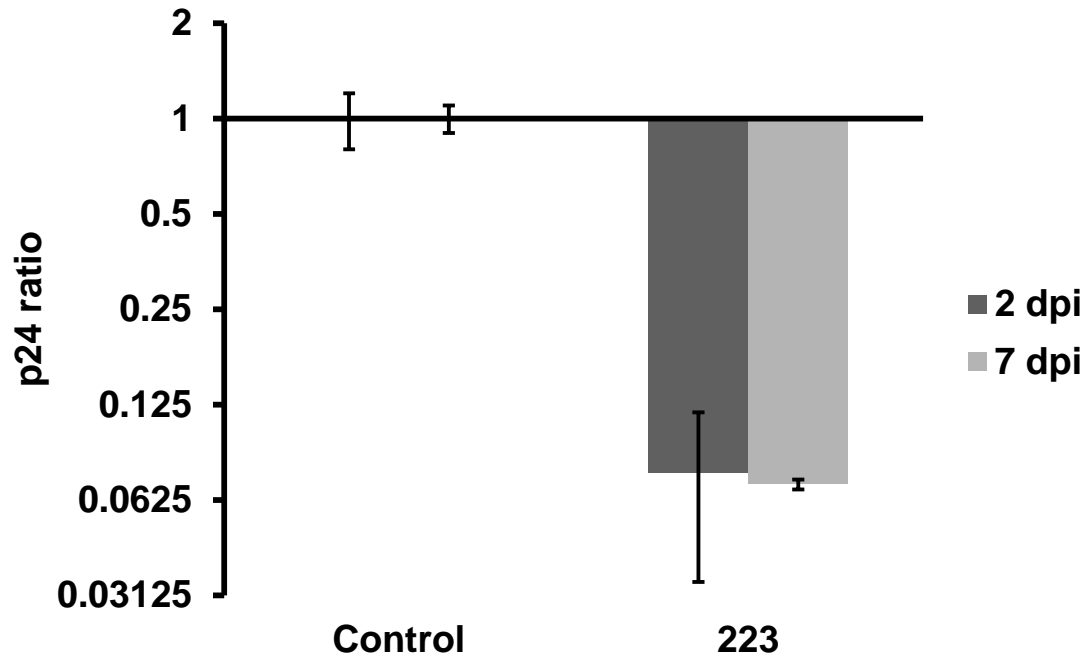
The "Berlin patient"

Source: POZ magazine

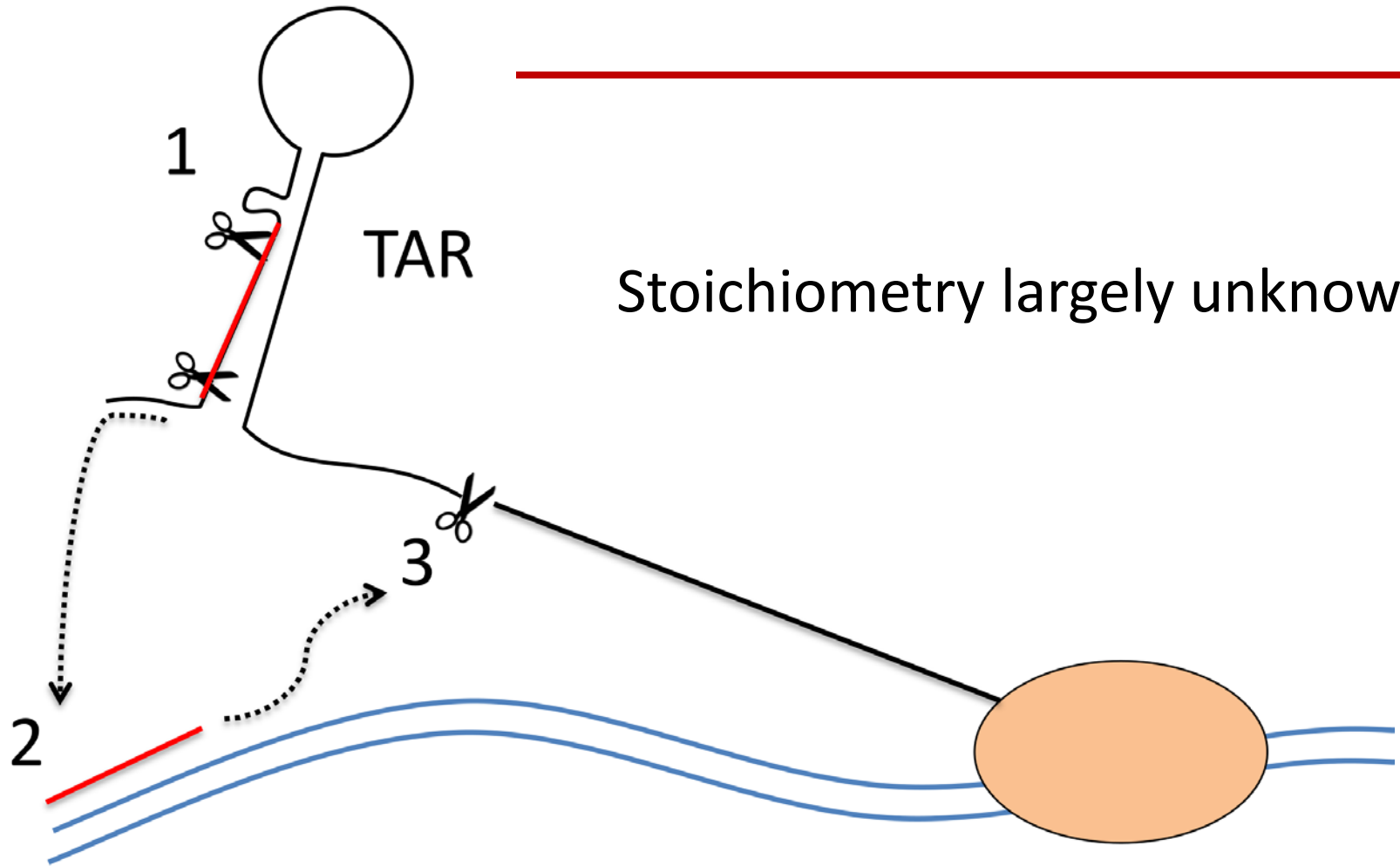
Eradication on the horizon?

- **Stem cell transplant:** Timothy Ray Brown
- **Shock and kill:** activate latent reservoir, immune system does the rest
- **Early treatment** or treatment intensification

miR-223 vs. control



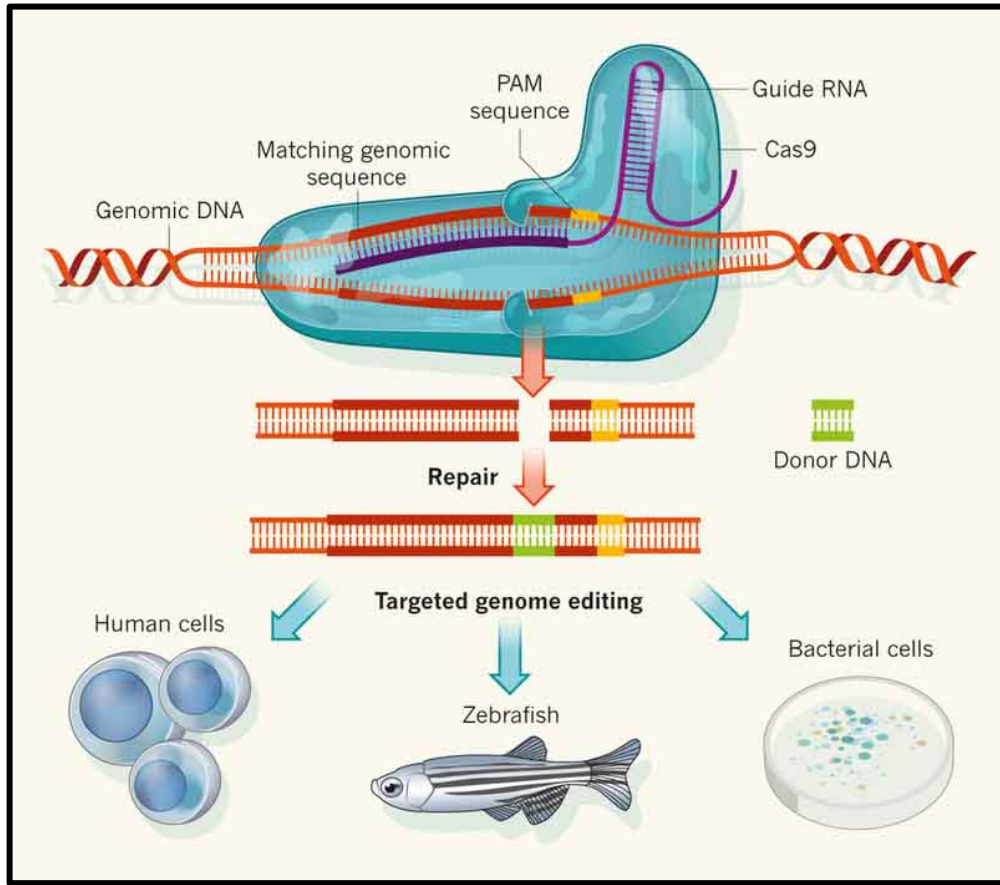
Nuclear HIV sRNA



Stoichiometry largely unknown

- L Wagschal, et al., *Cell*
- Z Klase, et al., *BMC Mol Biol*

Does CRISPR/Cas offer a specific activation option?



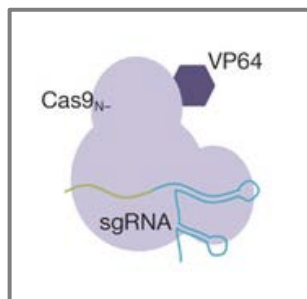
Non-specific activators are:

- 1) inefficient (activate only a small proportion of the latent reservoir)
- 2) Potentially counterproductive (may promote new infection)

CRISPR/Cas has been reported to excise latent HIV in several models

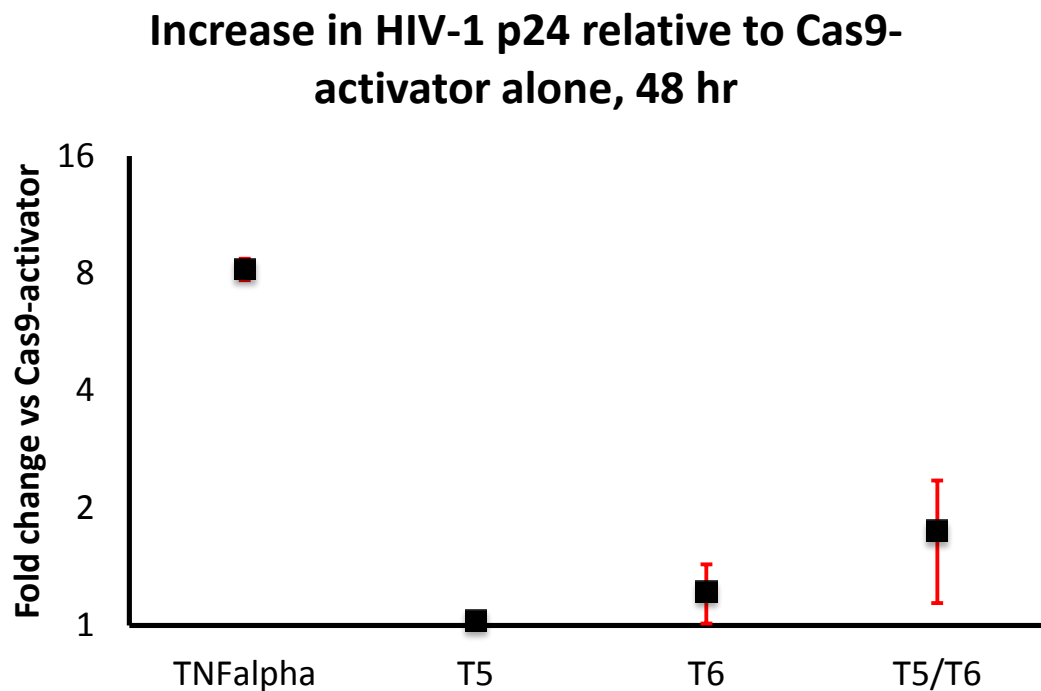
How would this be done in vivo?
Even a small percentage of off-target cleavage could result in catastrophic problems.

Another strategy: transcriptional activation

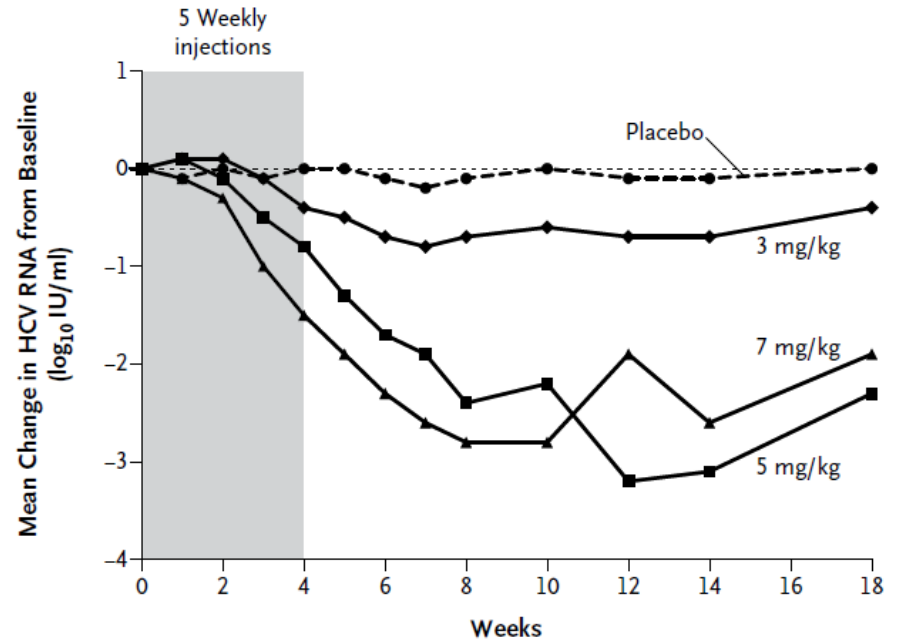
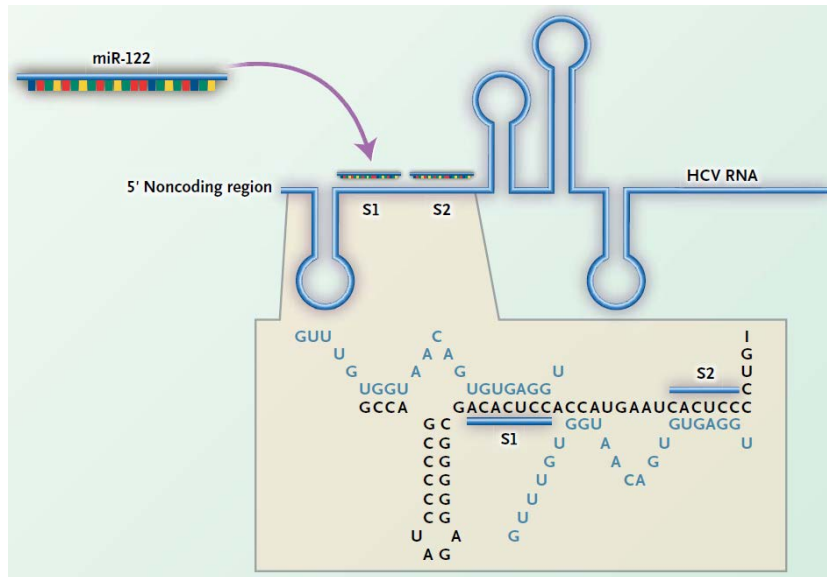


Procedure:

- ACH-2 latency model
- Introduce Cas9-fusion and gRNA sequence(s)
- Measure levels of released HIV-1 p24 protein



Small RNA-based therapy passes Phase 2



Note persistence of effects following injections

Bonus: significant reduction in cholesterol levels

Delivery to liver

- MRX34: liver cancers
- 1st, 2nd, 3rd gen oligonucleotides
- Backbone modifications
 - phosphorothioate
- Other mods and tags



Other exposure routes?

Alnylam anti-RSV drug

- Alnylam RSV01 and RSV02
- Delivery of aerosolized naked RNA (siRNA)
 - Inhalation
 - Intranasal
- Promising data, but failed Phase IIb trial, partner backed out
- Claimed evidence of RNAi mechanism was doubted by some (innate immune response?)

Can we exploit oral RNA therapeutically in mammals?



Will mammals be harmed by off-target effects of ingested RNA?

“Holy grail”: oral delivery of small RNA therapeutics?

nature

Vol 458|30 April 2009|doi:10.1038/nature07774

LETTERS

Orally delivered siRNA targeting macrophage Map4k4 suppresses systemic inflammation

Myriam Aouadi^{1*}, Gregory J. Tesz^{1*}, Sarah M. Nicoloso¹, Mengxi Wang¹, My Chouinard¹, Ernesto Soto¹, Gary R. Ostroff¹ & Michael P. Czech¹

TNF α siRNA in a glucan shell

Proposed mechanism: uptake through Peyer's patches M cells

Phagocytosis by macrophages \rightarrow acidification \rightarrow siRNA release

Observed decline in circulating TNF α , macrophage RNA

Pharmaceutical industry has had little or no success with oral delivery of RNA—to the point that the oral route is often used as a negative control



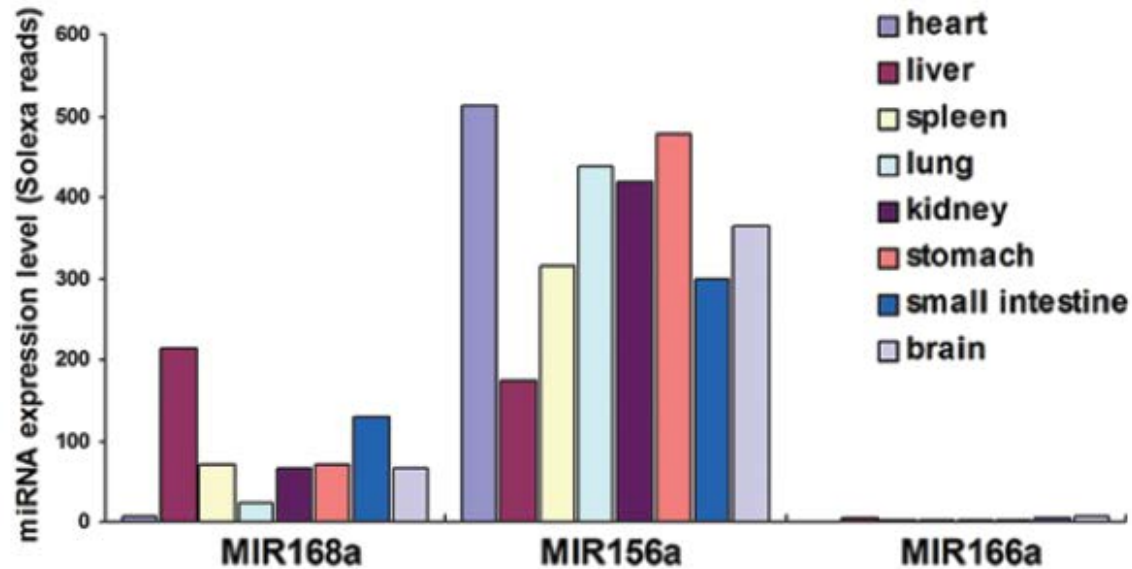
ISEV 2015
Washington, DC
April 23-26
at the Bethesda North Marriott hotel

Nurturing innovative science at US NIH



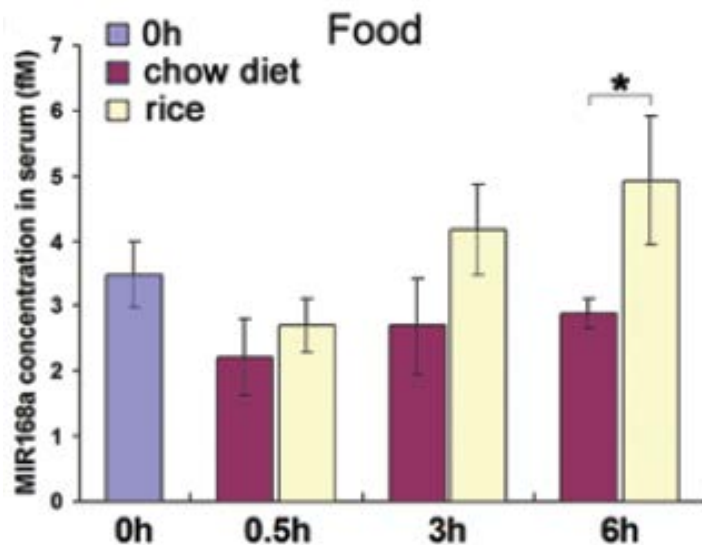
Francis Collins, April, 2015: International Society for Extracellular Vesicles

Report: Dietary miRNAs in tissue



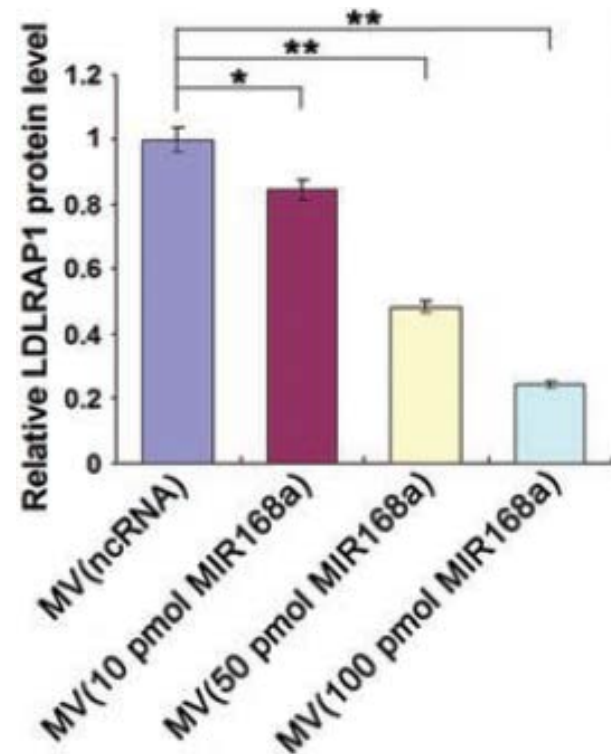
Organism: mouse

LDLRAP1: Dietary MIR168 affects an mRNA in liver



Organism: mouse

Dose-dependent effect on a predicted target RNA

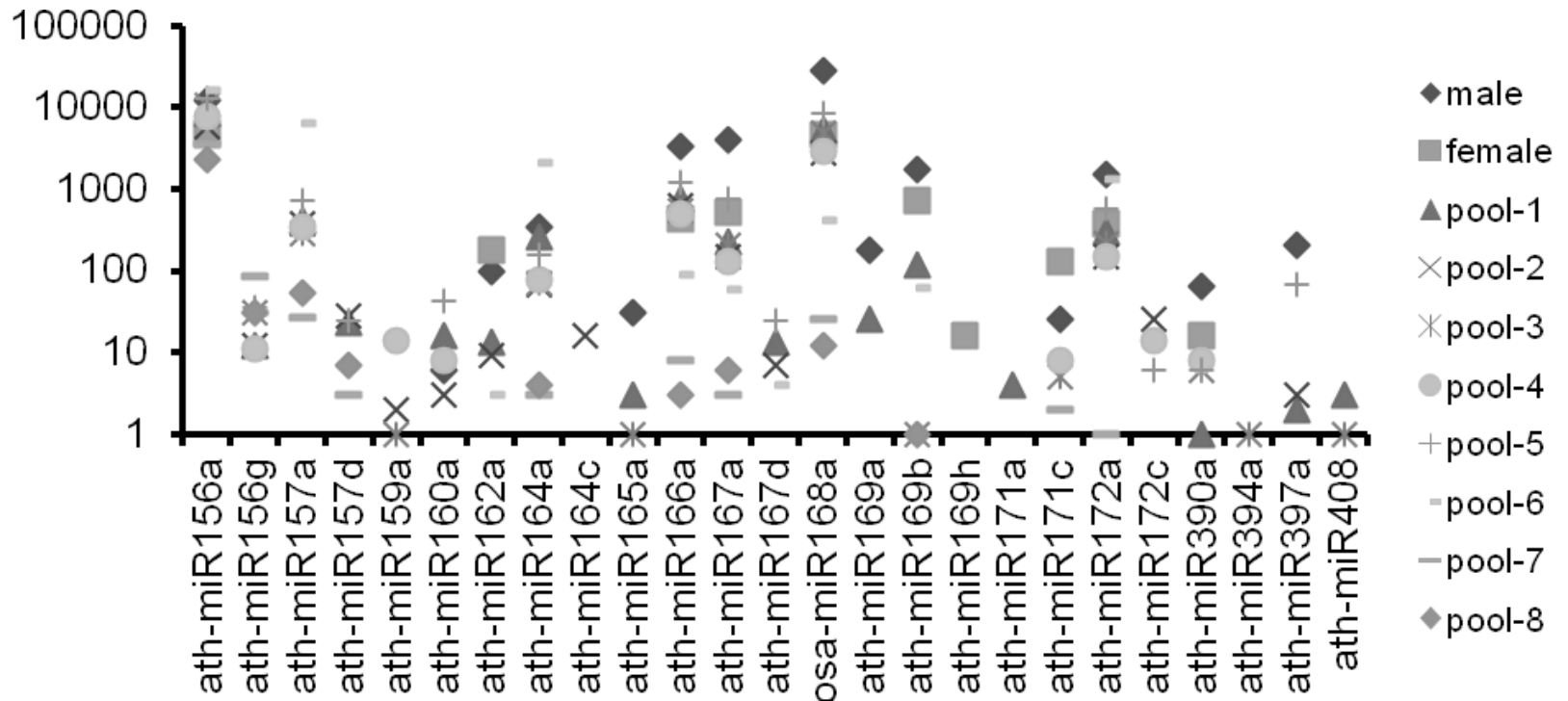


Why did Francis Collins mention this?

- NIH commitment to extracellular RNA research
- Desire to foster innovation
- Need to balance novelty and sound-bite excitement with solid science
- Need for reproducibility and replication studies
- Cloud of controversy

Dietary plant miRNAs enter the bloodstream of human donors

...?



Negative feeding studies

- Snow, et al., *RNA Biology*, 2013
 - Negligible or no detected uptake in bees, mice, humans with diets replete with microRNA
- Witwer, et al. *RNA Biology*, 2013
 - Nonhuman primates: no increase in response to dietary intake; low-level detection was non-specific
- Dickinson, et al., *Nature Biotechnology*, 2013
 - Negligible uptake in mice with rice diets (more MIR168a than in Zhang, et al.)
 - No LDLRAP1 response to feeding
 - Mouse LDL increase was due to nutritional insufficiency



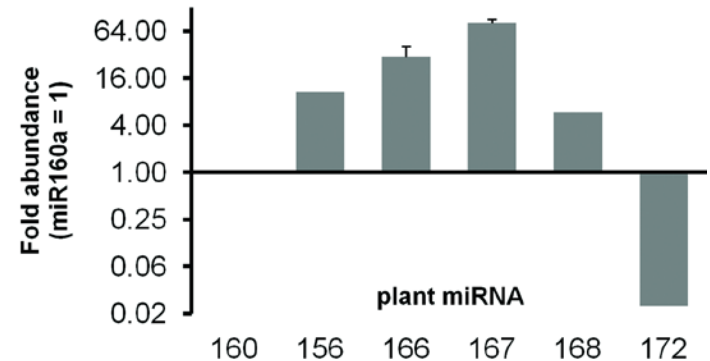
Negative feeding studies

- Petrick, et al., *Regul Toxicol Pharmacol*, 2015
 - Feeding small RNAs or a long dsRNA against an essential gene had no affect on mice
 - 28-day study
 - No evidence of uptake or function of the dietary RNA



Pilot design: mammalian uptake

Pigtailed macaques
Gavage: ~5% of estimated
blood volume



0



1



4

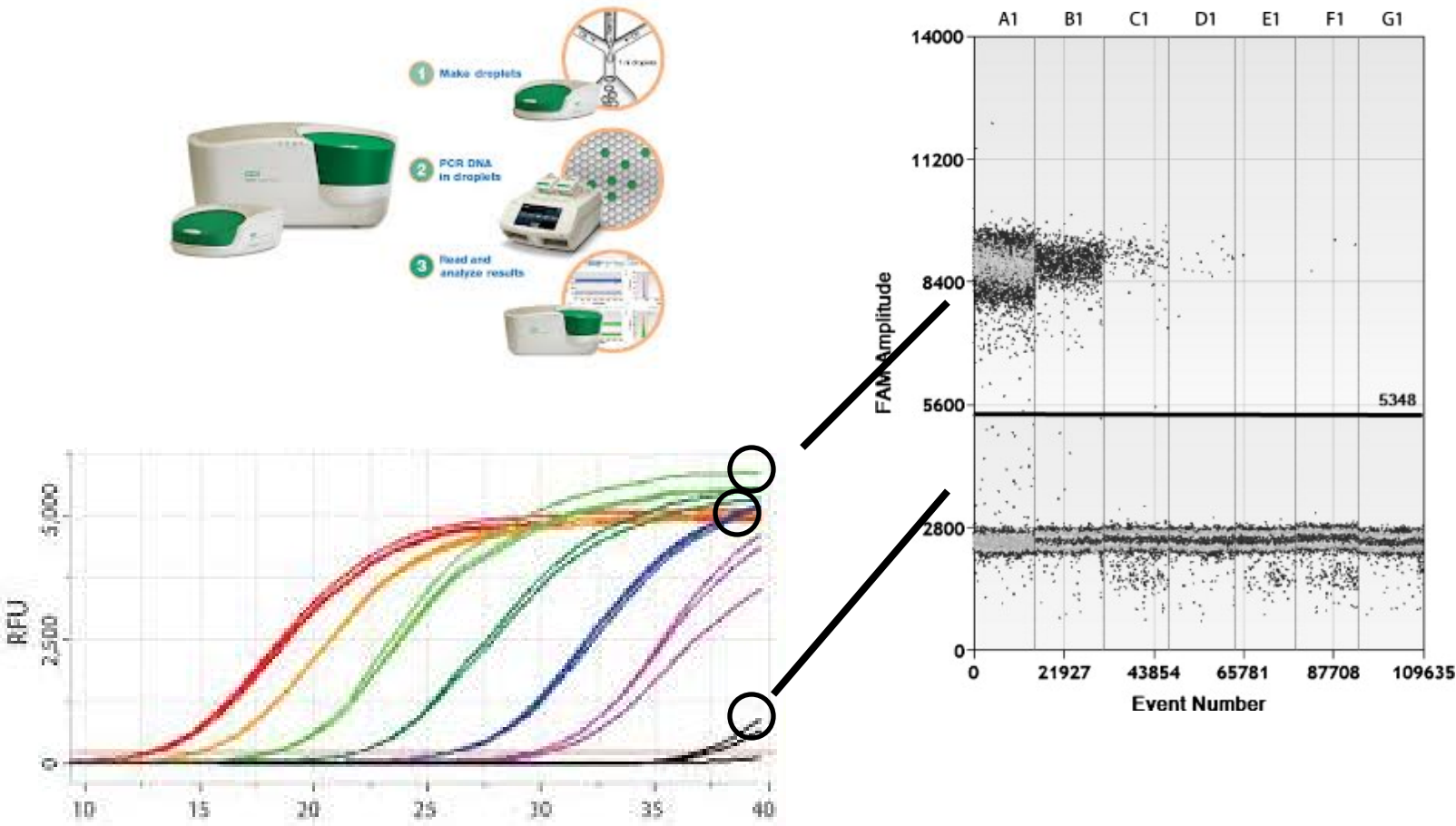


12

Blood draws: hours post-gavage

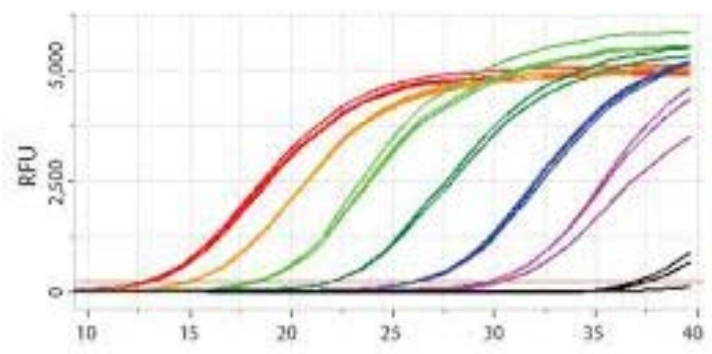
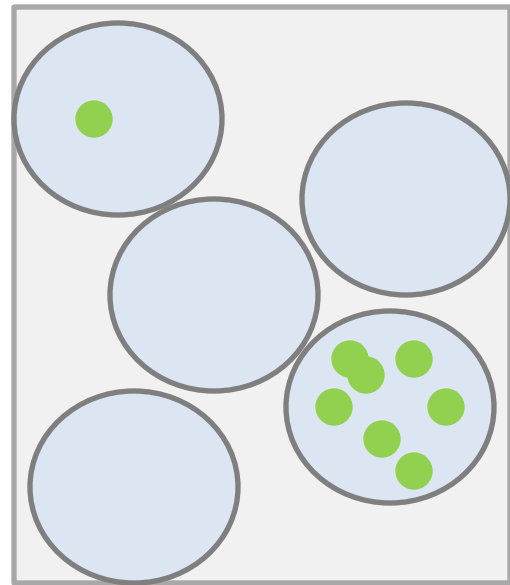
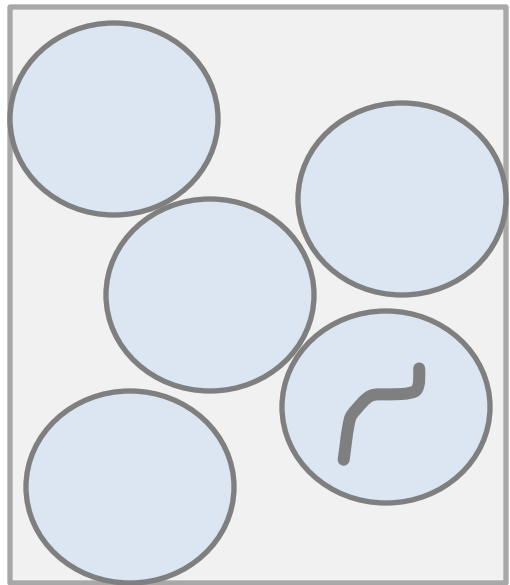
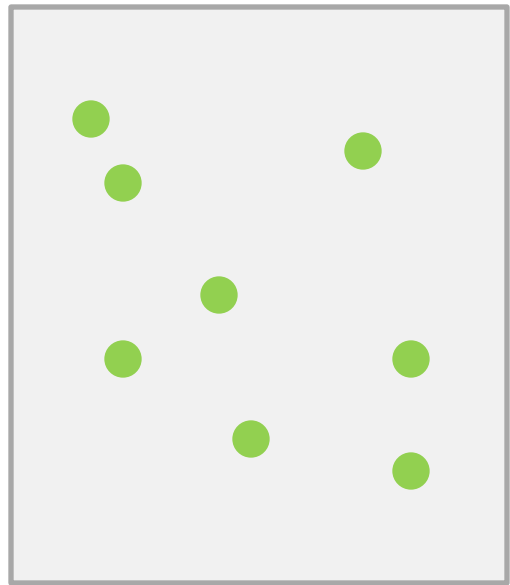
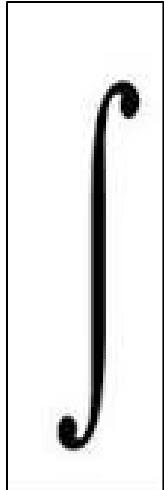
→ Immediate processing to platelet-poor plasma
Initial RNA extraction by Ambion mirVana protocol

Droplet digital PCR (ddPCR)



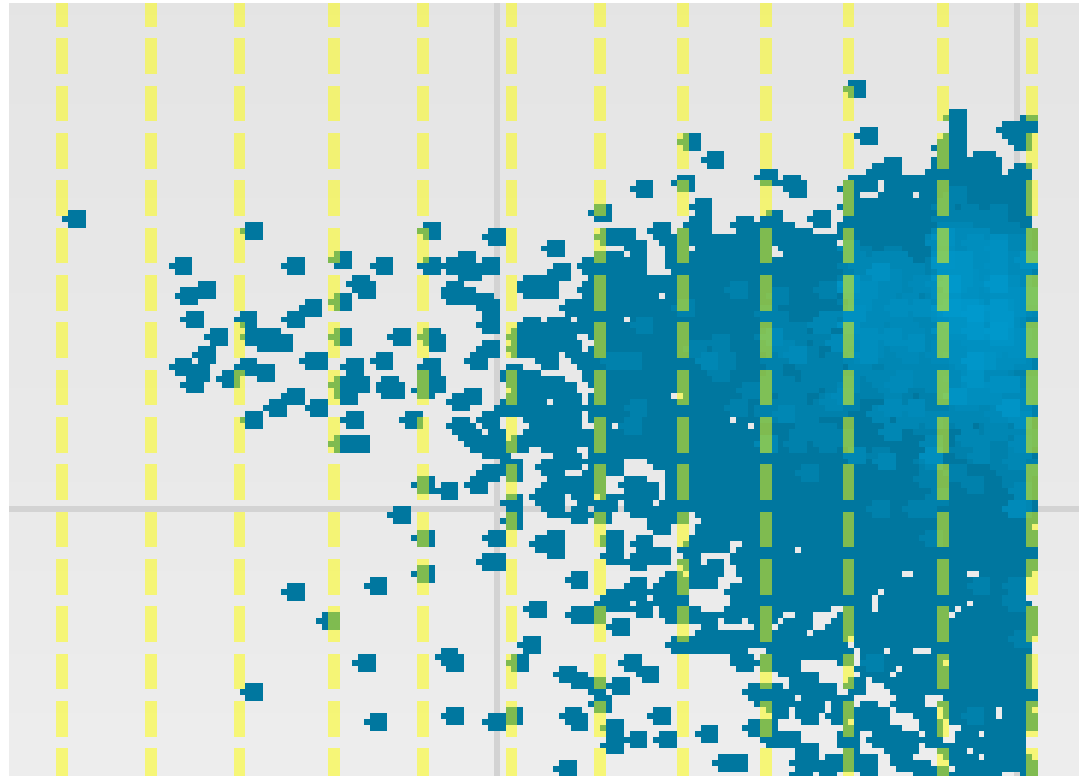
Traditional hydrolysis probe qPCR

Emulsion "Droplet Digital" PCR



ddPCR Perspective: sensitivity

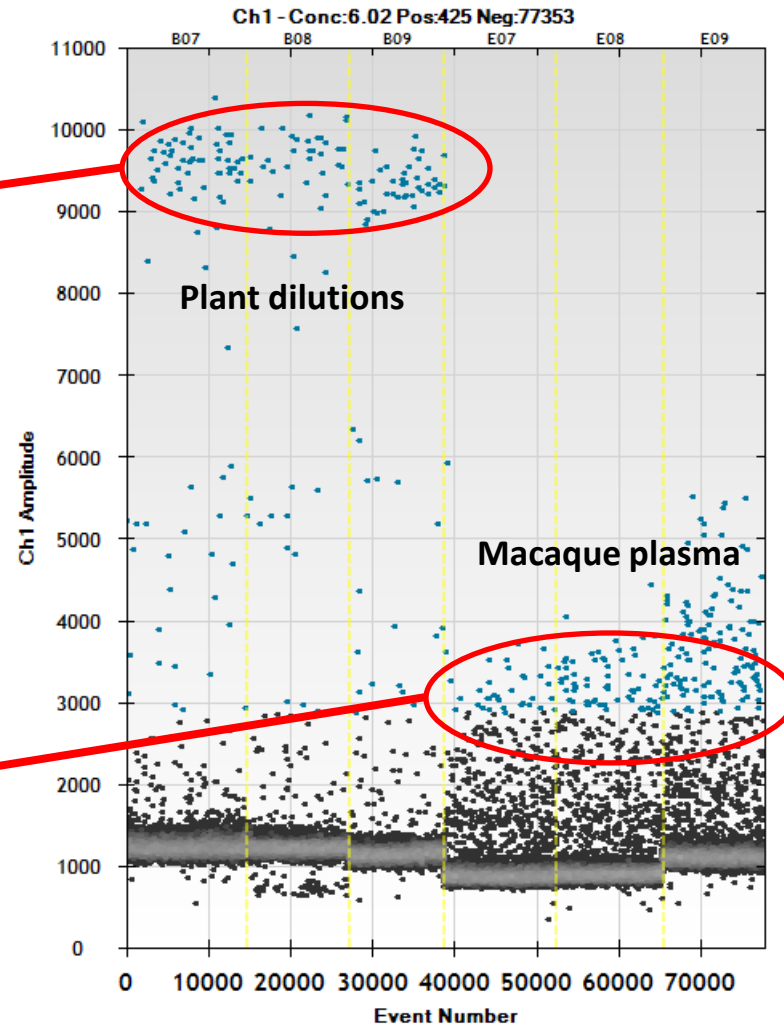
Expected	Observed
256	261
128	134
64	62
32	31
16	17
8	8
4	4
2	2
1	1
0.5	0.8
0	0



Droplet digital PCR results

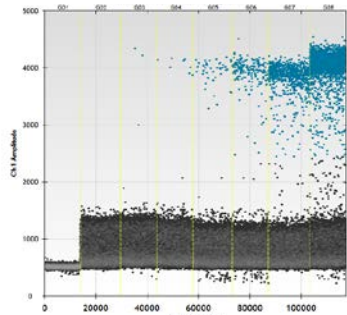
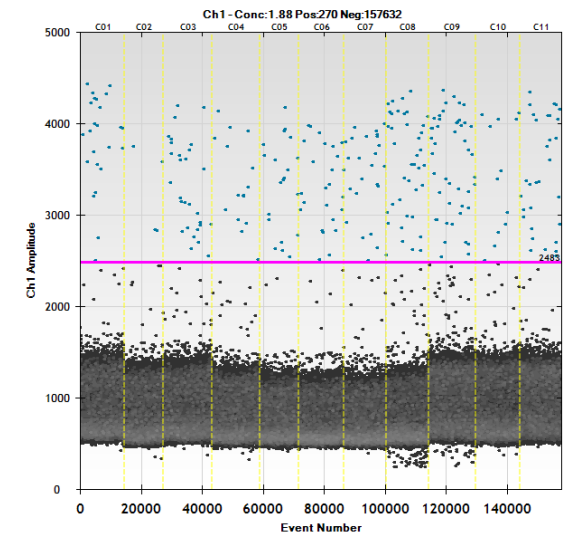
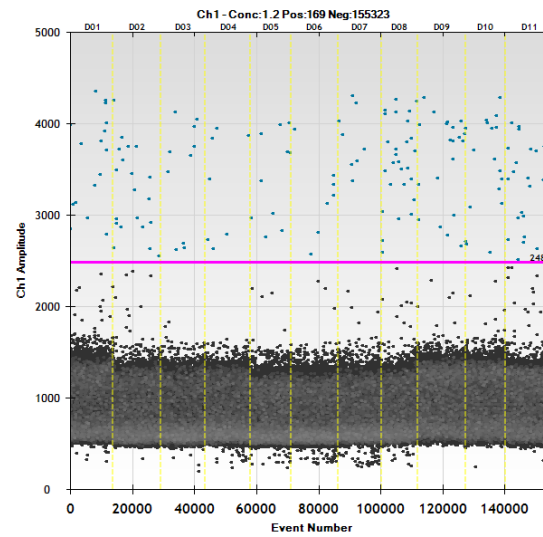
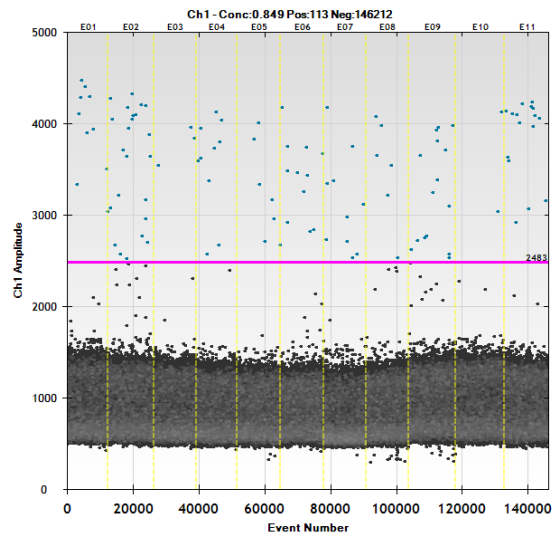
Single predominant product in highly diluted plant material = specific

Non-specific amplification



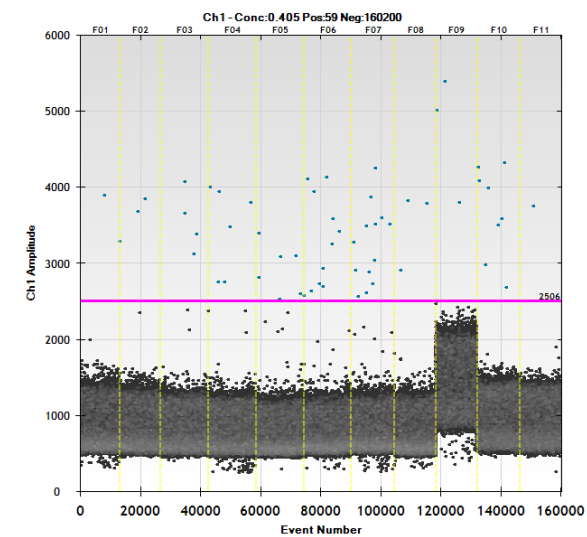
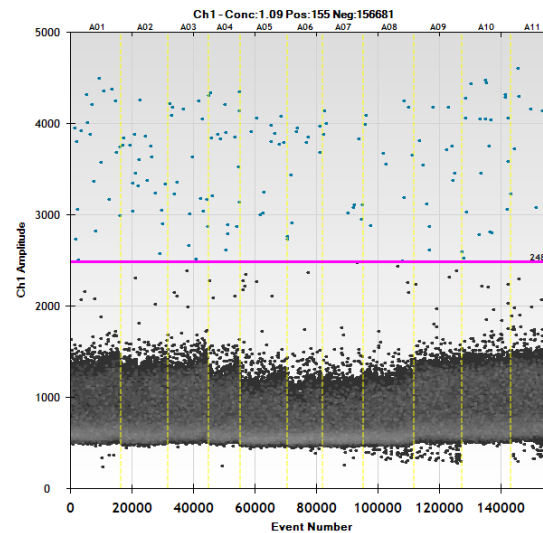
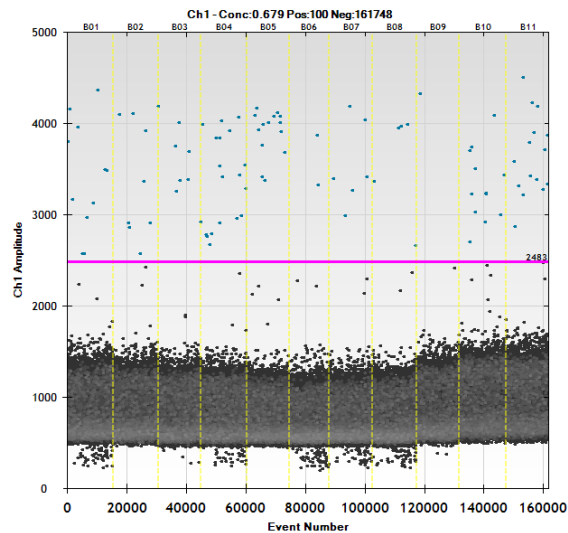
miR168: one of the most abundant miRNAs in the original study

Unpublished feeding study:
multiple time points pre to post
prandial



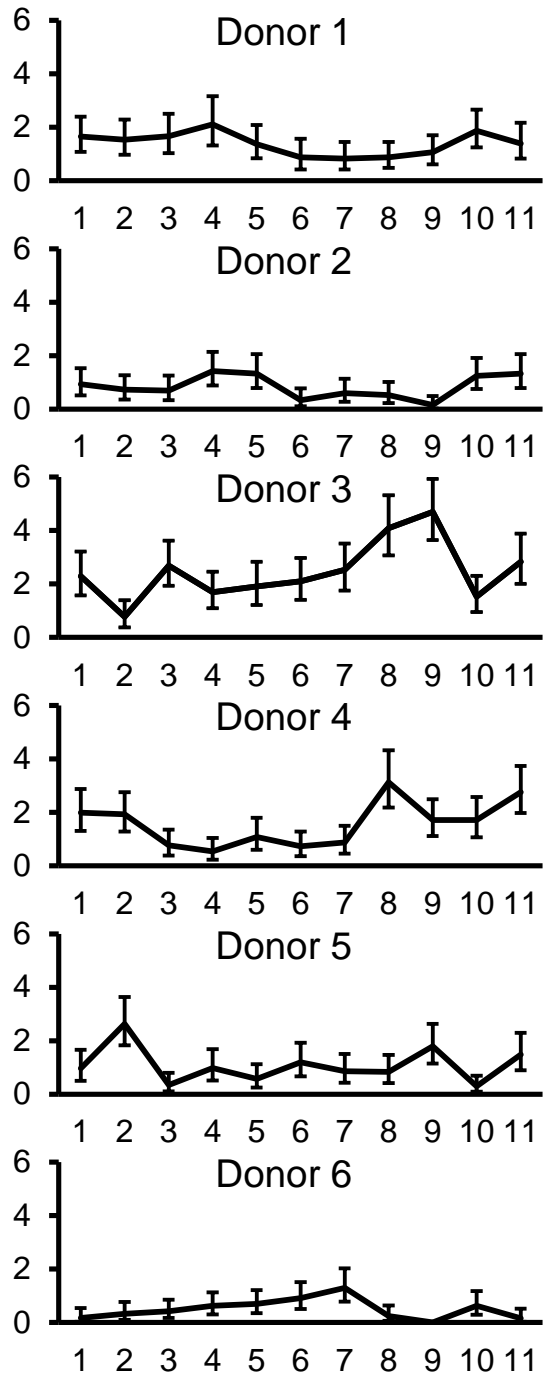
Standards for comparison

MIR156a
Intensity plots (not necessarily in order by donor #)

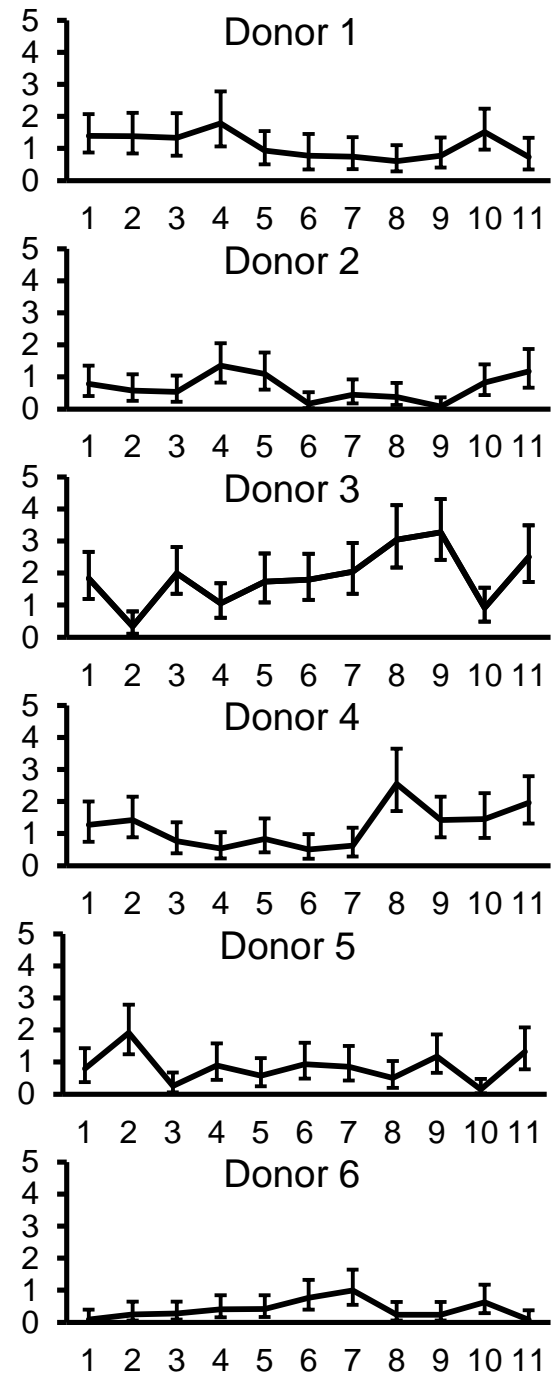


MIR156a
Raw counts/ul

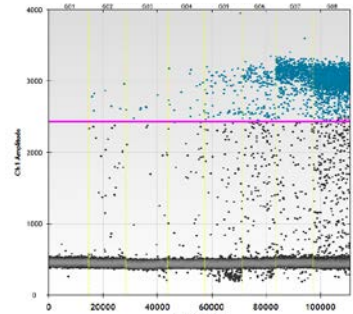
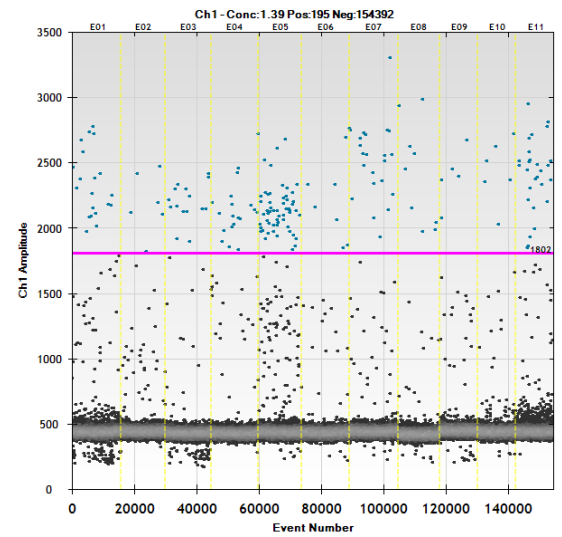
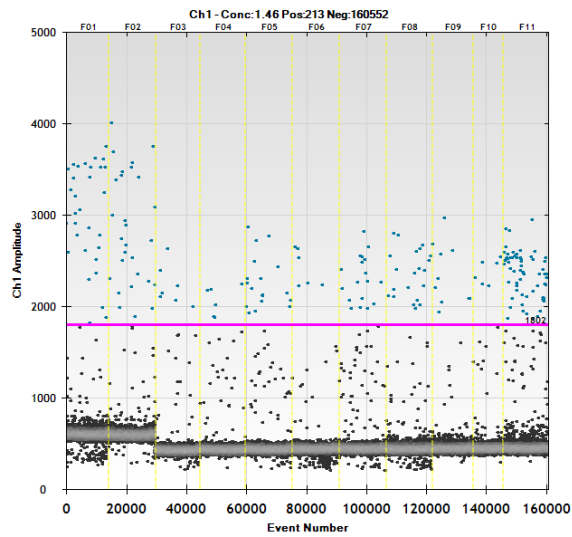
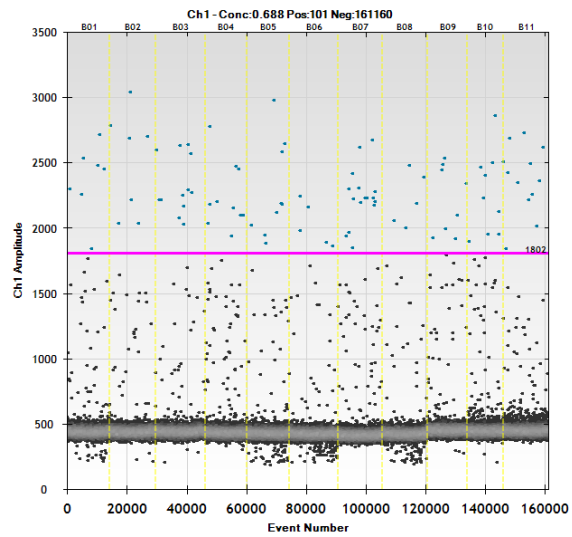
Automatic threshold



Manual threshold

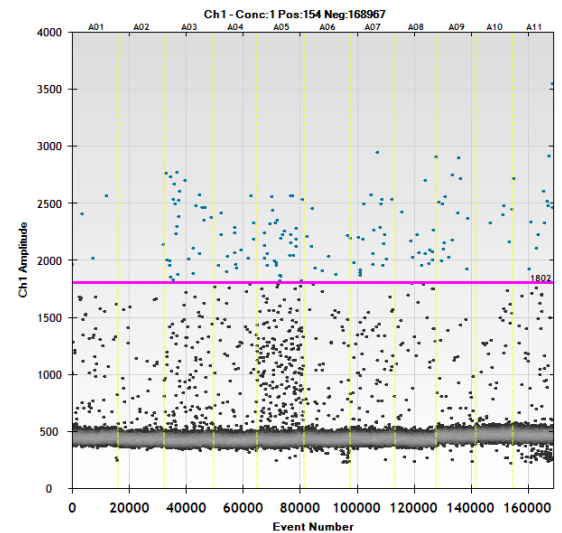
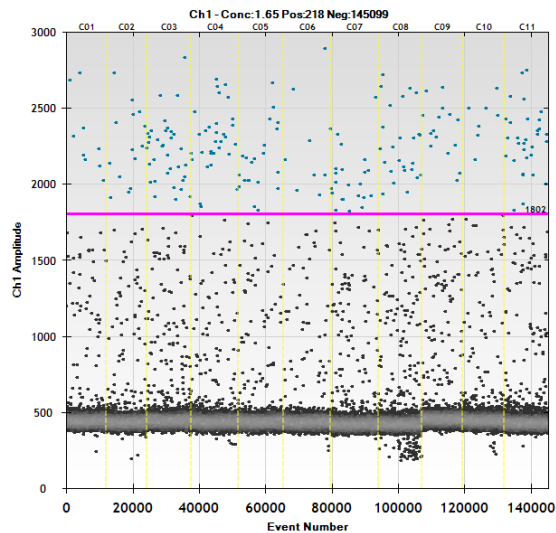
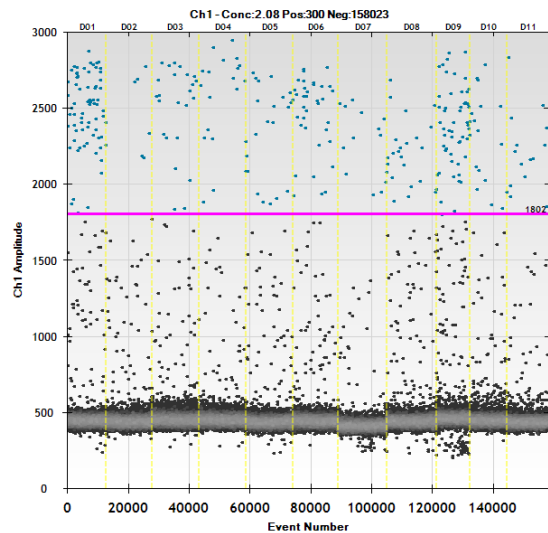


Bars: max and min of Poisson confidence interval



Standards for comparison

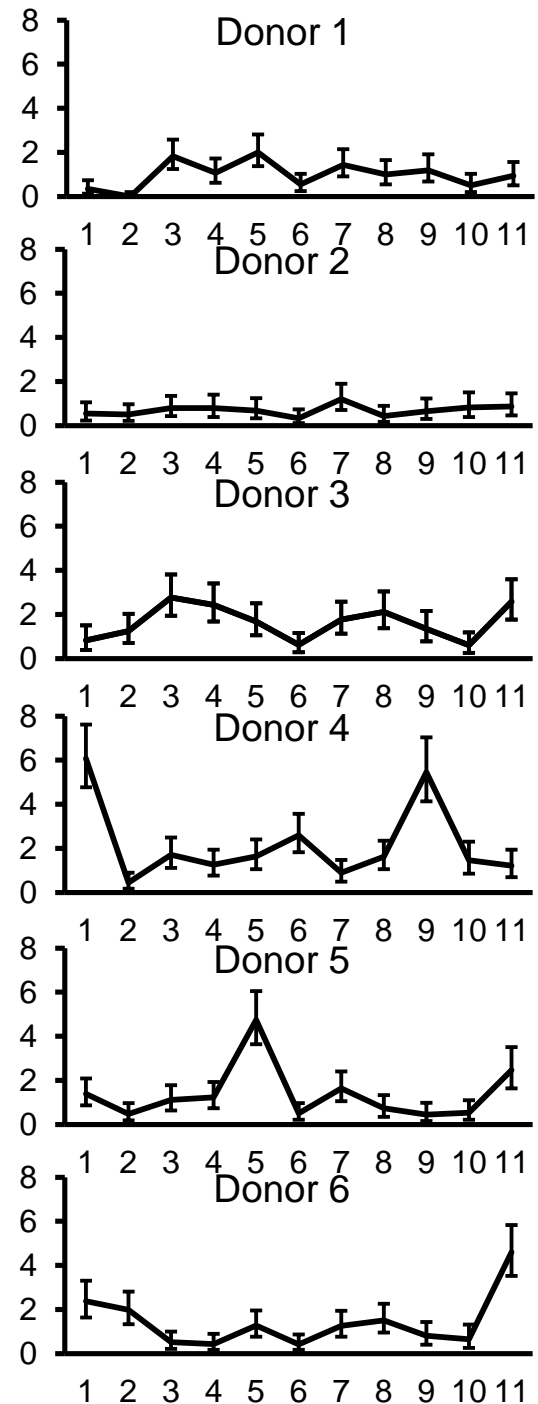
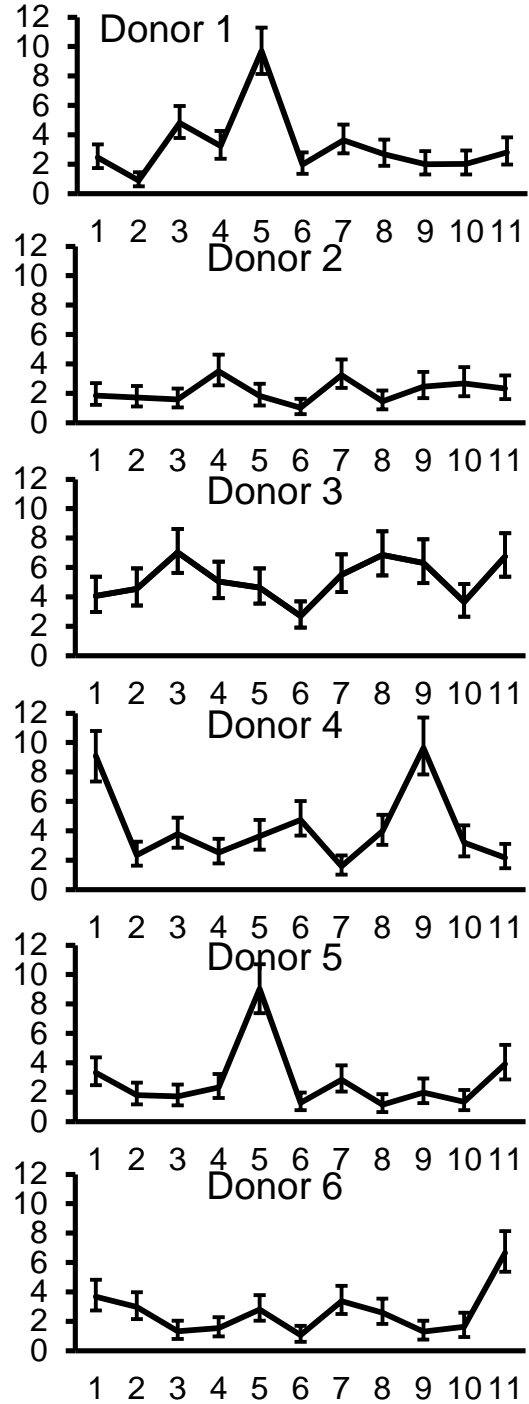
MIR168a
Intensity plots (not necessarily in order by donor #)



MIR168a
Raw counts/ul

Automatic threshold

Manual threshold



Bars: max and min
of Poisson confidence
interval

Method optimization needed?

Problem with plant RNA modification(s), e.g. 2'-O-methyl?

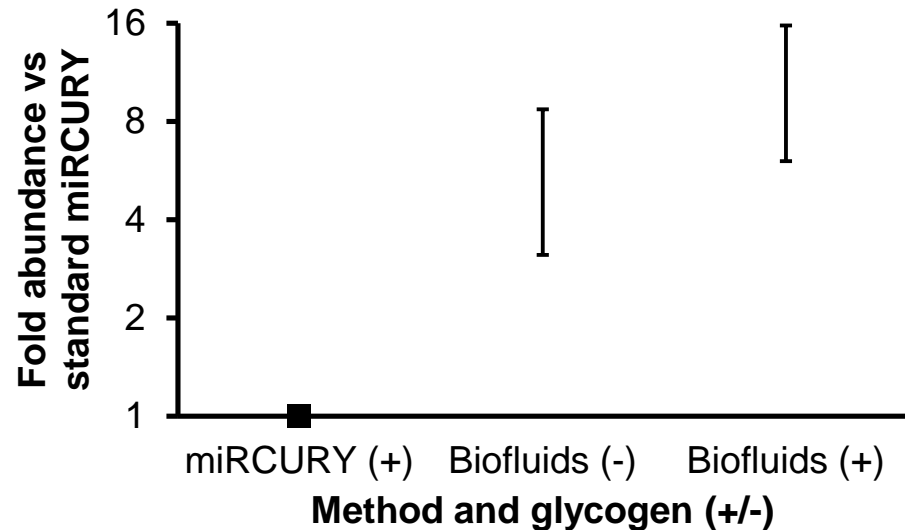
--No; very sensitive detection of plant miRNAs

Low abundance RNAs missing from recovered sample?

Biofluids RNA method
from Exiqon
(12/2012)

Improved recovery,
inhibitor removal

Verified performance



Additional negative findings

- Zhang, et al., *BMC Genomics*, 2012
 - Public dataset analysis
 - Few plant miRNAs detected, at low copy numbers
 - MIR168a consistent with artifact
- Wang, et al., *PLOS One*, 2012
 - human study; low read numbers of MIR168a only
 - No increased uptake with colitis, colon cancer
 - Improved analytic pipeline: no more mapping to MIR168a!
- Wang, et al., *Toxicol Sci*, 2013
 - mouse liver toxicity study; low MIR168a only
- Tosar, et al., *RNA*, 2014
 - Sequencing reads consistent with contamination

Tosar *et al.* explore contamination

- Turtle RNA found in human sperm?
 - Food story vs. food fact: clearly a contaminant
 - Due to work on turtles in lab
 - Eliminated with stringent anti-contam. protocols
- Review of Zhang *et al.* (rice) and chordate
 - No chordate exposure to plants
 - Almost identical plant miRNA “uptake” with humans
- → Contamination a widespread problem in RNA-seq...especially for endogenous RNA?



When “positive” studies prove the opposite



Available online at www.sciencedirect.com

ScienceDirect

Journal of Nutritional Biochemistry 26 (2015) 505–512

**Journal of
Nutritional
Biochemistry**

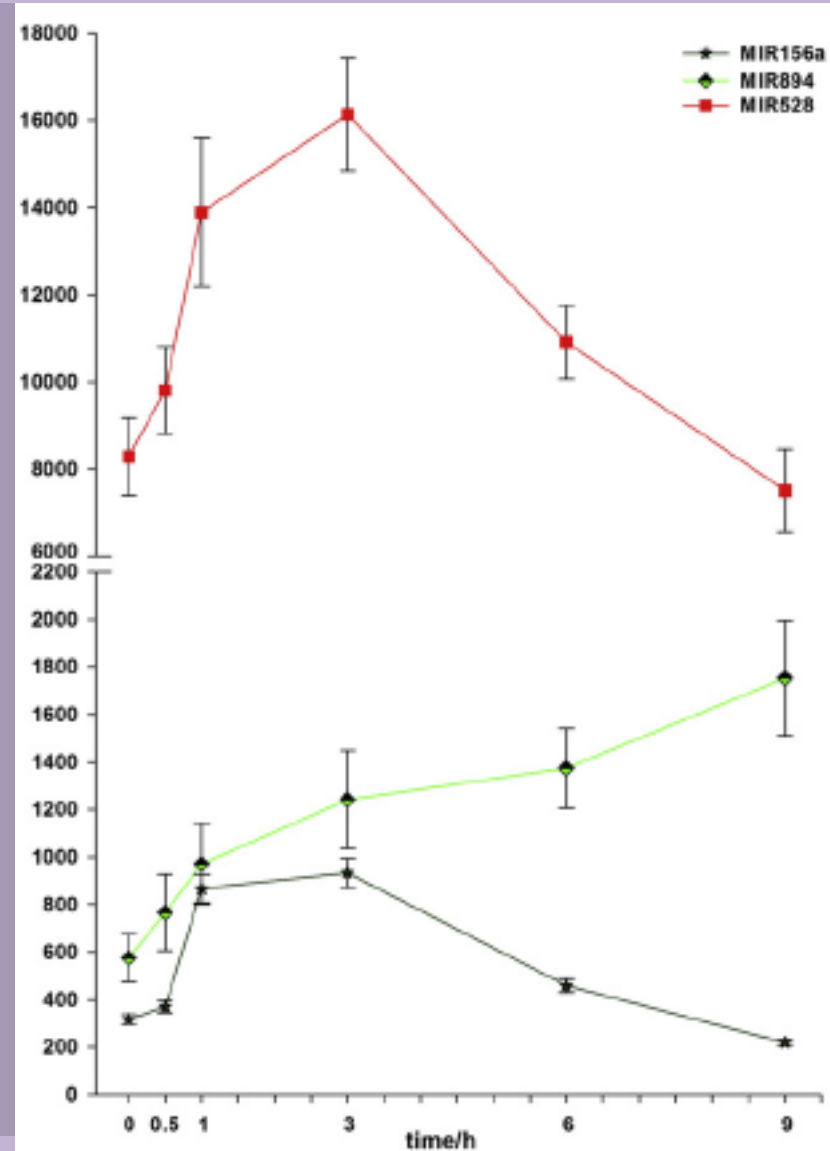
Effective detection and quantification of *dietetically* absorbed plant microRNAs in human plasma

Hongwei Liang¹, Suyang Zhang¹, Zheng Fu¹, Yanbo Wang, Nan Wang, Yanqing Liu, Chihao Zhao, Jinhui Wu, Yiqiao Hu, Junfeng Zhang, Xi Chen*, Ke Zen*, Chen-Yu Zhang*

- Nine humans drank 3 liters of watermelon juice
- Blood draw: before, several time points after ingestion
- >20 miRNAs measured, including 16 plant miRNAs

Watermelon...or not?

- Best response: MIR528
 - Doubling of concentration
 - Rise and fall with time
 - 1.3% uptake: more than all other plant miRNA
- Unfortunately, MIR528 is a miRNA of monocots
- Watermelon is a dicot: no similar seq. in genome
- Contamination?
- “Positive” studies underscore negative findings (see also no template controls!)

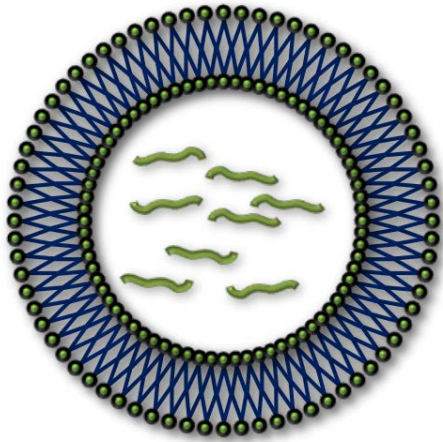


Positive mammalian studies: in common

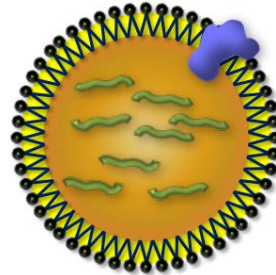
- Ambiguous or nonsensical results and statistics issues
- Lack of controls
- Mechanistic studies lacking
- Wide-reaching claims not supported by evidence

Principles: uptake and function

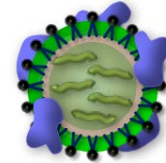
Small RNA “vehicles” carry and protect



EV



HDL



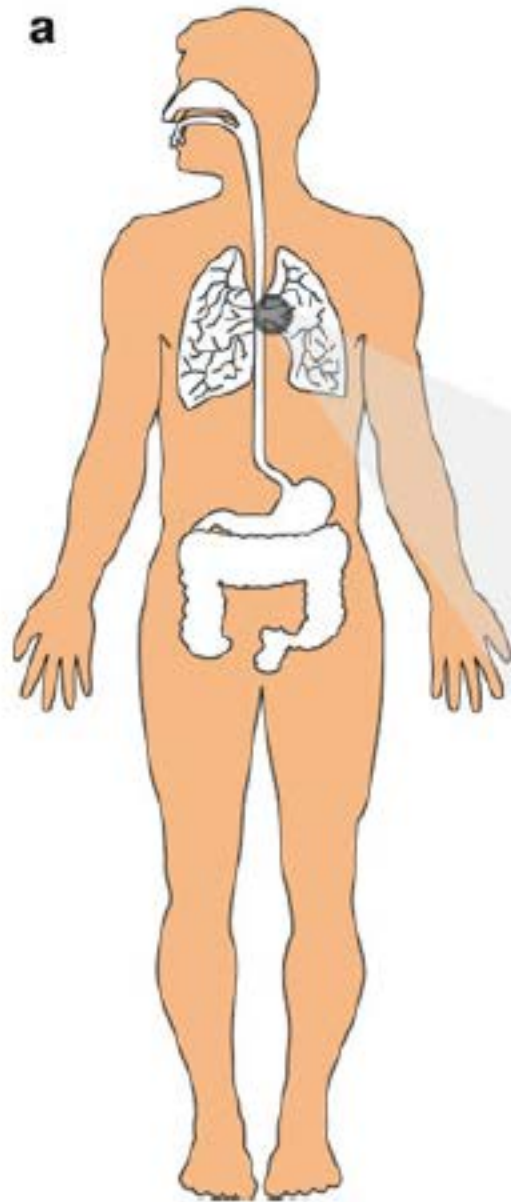
LDL



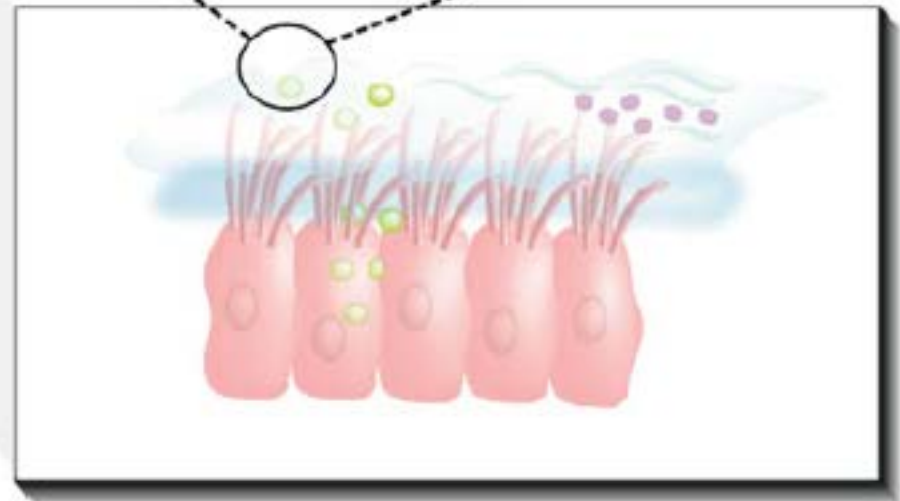
Protein
complex

RNases: the piranhas of the body



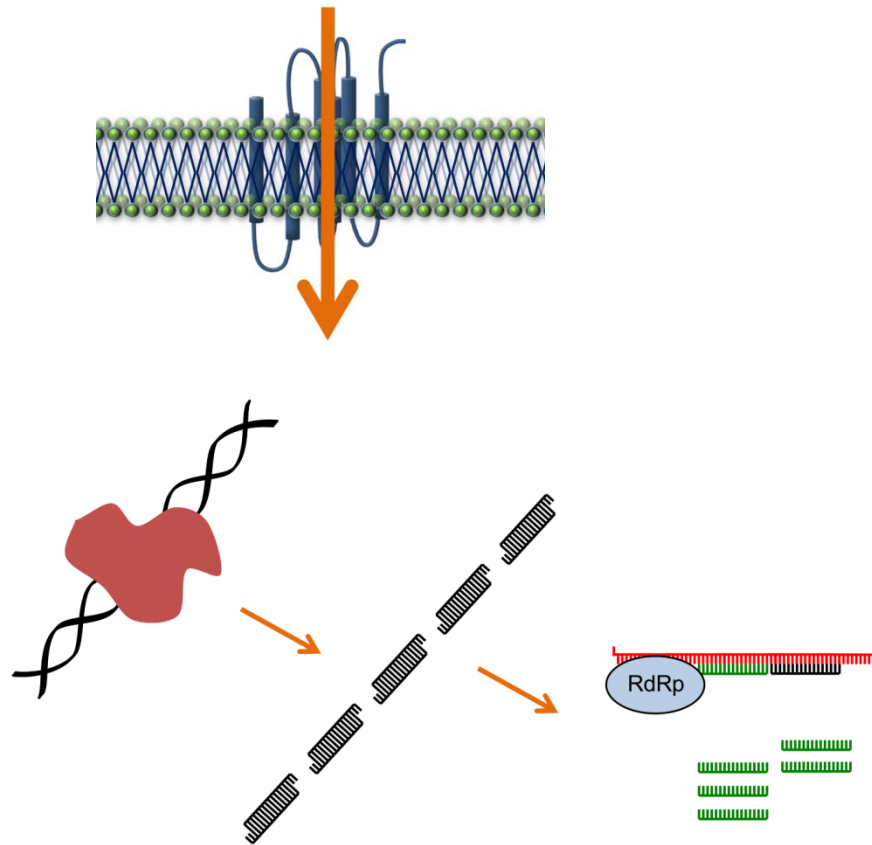


b



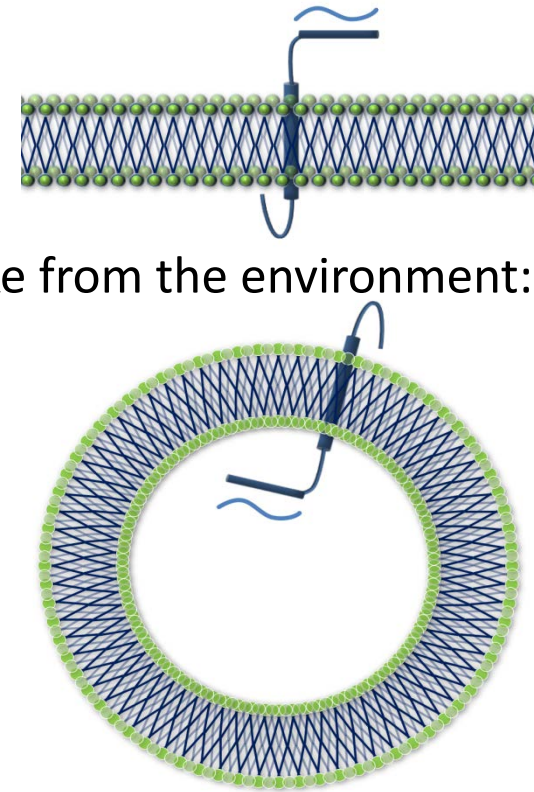
RNAi mechanisms not observed in mammals

Spreading interference: SID-1



RNAi amplification

Uptake from the environment: SID-2



Witwer and Hirschi, BioEssays 2014

A long road

- RNases: are dietary RNAs protected by Argonaute? In “vesicles”?
- Across the mucus layer
- Across the intestine and through the blood
- The next barrier: cell membrane, endosome
- Could a plant Argonaute-complexed plant small RNA function in a mammalian cell?
- How many copies of a *functional* RNA needed?
- What is the effect of an off-target interaction?

In vivo, most miRNAs are NOT in active complexes

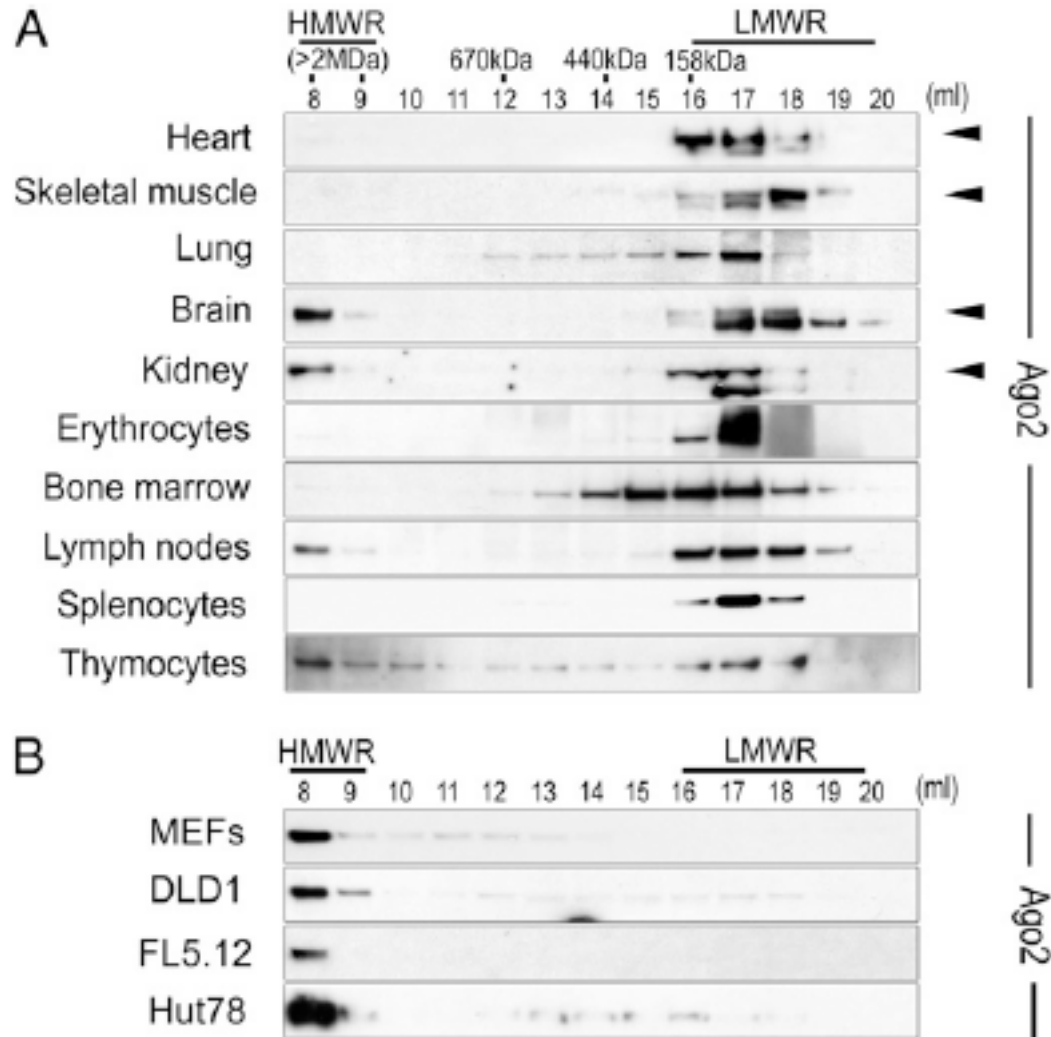
PNAS

In vivo, Argonaute-bound microRNAs exist predominantly in a reservoir of low molecular weight complexes not associated with mRNA

Gaspare La Rocca^{a,1}, Scott H. Olejniczak^{a,1}, Alvaro J. González^b, Daniel Briskin^c, Joana A. Vidigal^a, Lee Spraggon^a, Raymond G. DeMatteo^a, Megan R. Radler^a, Tullia Lindsten^d, Andrea Ventura^a, Thomas Tuschl^c, Christina S. Leslie^b, and Craig B. Thompson^{a,2}

^aCancer Biology and Genetics Program, ^bComputational Biology Program, and ^dImmunology Program, Memorial Sloan-Kettering Cancer Center, New York, NY 10065; and ^cHoward Hughes Medical Institute, Laboratory of RNA Molecular Biology, The Rockefeller University, New York, NY 10065

In vivo, most miRNAs are not in an active complex



Off-target effects

siRNA effects

Off-target “miRNA-like” effects

Stimulation of the innate immune system

Saturation of RNAi machinery

Off-target “miRNA-like” effects

Expression profiling reveals off-target gene regulation by RNAi

Aimee L Jackson^{1,2}, Steven R Bartz^{1,2}, Janell Schelter¹,
Sumire V Kobayashi¹, Julja Burchard¹, Mao Mao¹, Bin Li¹,
Guy Cavet¹ & Peter S Linsley¹

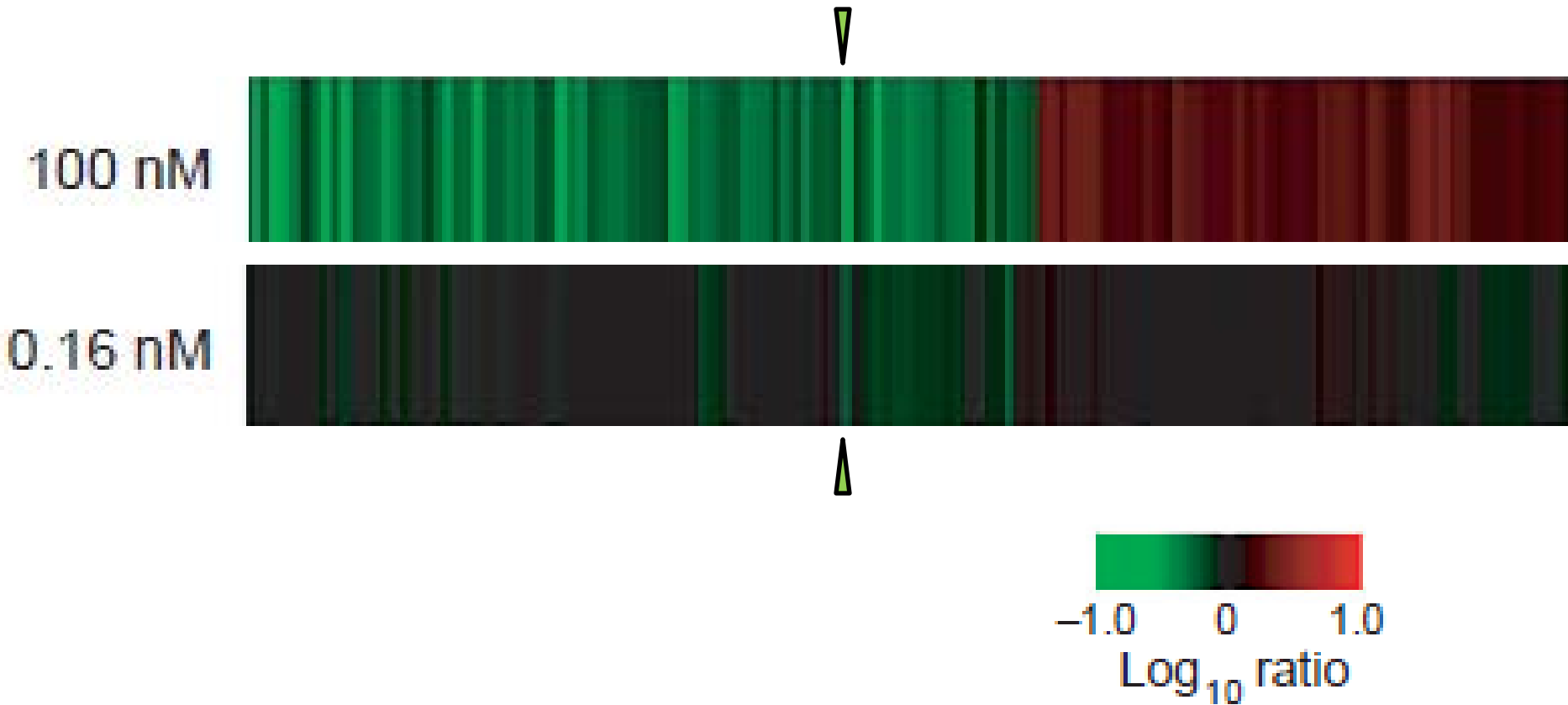
NUMBER

VOLUME 21

NATURE BIOTECHNOLOGY

- 6-well plates: approximately one million cells
- RNA added at 100 nM
 - 100 pmol, 750 ng; 1 mL transfection volume
 - Or 60 trillion molecules of RNA
- 60 million molecules of miRNA per cell
- Almost all off-target effects disappeared at 0.16 nM, i.e. at 100,000 copies/cell

Off-target “miRNA-like” effects



Cellular exposure comparison

>1E5

- Off-target miRNA effects
- Saturation of machinery

6E6 +

- Immune stimulation (some RNA lengths/sequences)

1E7 +

- Typical treatment for 3' UTR luciferase assays

< 1

- In vivo dose based on *highest, unconfirmed* reported circulating dietary RNA concentration

Exposure comparisons

- US EPA FIFRA-SAP: public comments
 - PIP dsRNA is at nanogram/gram levels *in planta*
 - Assuming same level in edible parts, a 70 kg human might ingest up to several micrograms RNAi agent
 - Assuming 100% uptake, ~40 nanograms/kilogram = 1 **millionth** the therapeutic dose for *injected* RNAi
- Biological barriers
- No known mechanism for uptake of dsRNA by mammals...or processing of plant dsRNA into ss effectors...or uptake of small RNA effectors
- Homeopathy?

“Without exposure, there is no risk”

“The dose makes the poison”

“Gene technology has not been shown to introduce any new or altered hazards into the food supply, therefore the potential for long term risks associated with GM foods is considered to be no different to that for conventional foods already in the food supply” -FSANZ

Evidence of harm?

Prevalence and impacts of genetically engineered feedstuffs on livestock populations¹

A. L. Van Eenennaam² and A. E. Young

Department of Animal Science, University of California, Davis 95616

Journal of Animal Science, 2014

Prevalence and impacts of genetically engineered feedstuffs on livestock populations¹

A. L. Van Eenennaam² and A. E. Young

Department of Animal Science, University of California, Davis 95616

Table 2. Organic livestock production statistics in the United States (2011)

Industry	Number of organic farms in the United States ¹	Number of animals on organic farms ¹	Total number of livestock animals in the United States ²	Organic livestock numbers as percent of the U.S. total ³
Broilers	153	28,644,354	8,607,600,000	0.33%
Layers	413	6,663,278	338,428,000	1.97%
Turkeys	70	504,315	248,500,000	0.20%
Beef cows	488	106,181	30,850,000	0.34%
Dairy cows	1,848	254,711	9,150,000	2.78%
Hogs	97	12,373	110,860,000	0.01%

¹USDA National Agricultural Statistics Service, 2012.

²USDA Economics, Statistics, and Market Information

³USDA Economic Research Service, 2013.

Table 3. Estimated cumulative number of livestock raised in the United States during the period from 2000 to 2011

Industry ¹	United States
Broilers	94,683,600,000
Layer Hens	3,722,708,000
Turkeys	2,733,500,000
Beef cattle	339,350,000
Dairy Cows	33,550,000
Hogs	1,219,460,000
Total	102,732,168,000

Less than 1% of livestock in the US are on “organic” farms

→ Trillions of meals of GM plant material during a period of improving health for livestock

Journal of Animal Science, 2014

Genetically Modified Crops

Produce Food as Safe and Nutritious as Conventional



3.95 Billion ACRES OF FARMLAND
USED FOR GMO CROPS SINCE 1996



63 COUNTRIES
WHERE GM CROPS HAVE BEEN APPROVED FOR CULTIVATION OR IMPORT



1000+ ACADEMIC STUDIES

SUPPORT THAT GMO CROPS ARE JUST AS SAFE AS THOSE DEVELOPED THROUGH TRADITIONAL BREEDING



13 YEARS

ON AVERAGE TO DEVELOP AND TEST GM SEEDS BEFORE THEY'RE GROWN COMMERCIALY IN THE U.S.



30 YEARS

THAT GMO CROPS HAVE BEEN RESEARCHED AND DEVELOPED



Conclusions

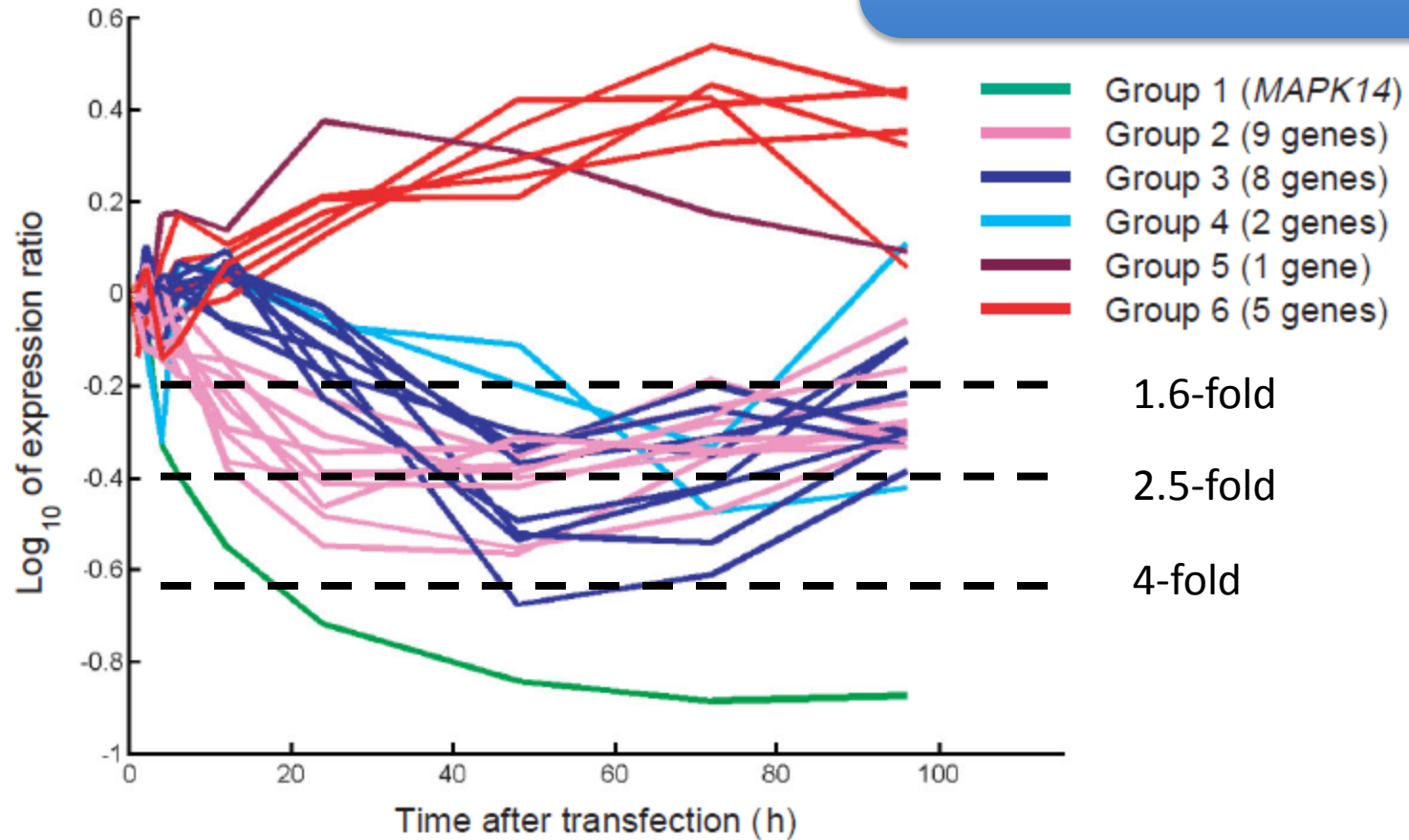
- RNA-based therapeutic strategies can be exploited in mammals—especially injectables, liver-targeted
- Oral delivery is difficult and unlikely to succeed
- Weight of the evidence: little uptake of dietary RNA in any form
- Studies claiming uptake and function are overshadowed by serious doubts, up to the level of the director of NIH
- Off-target effects of dietary, environmental RNA exposure are highly unlikely

Thank you!



Sasha Vlassov, Life Technologies

Off-target “miRNA-like” effects



Fatality in mice due to oversaturation of cellular microRNA/short hairpin RNA pathways

Dirk Grimm¹, Konrad L. Streetz^{1†}, Catherine L. Jopling², Theresa A. Storm¹, Kusum Pandey¹, Corrine R. Davis³, Patricia Marion⁴, Felix Salazar⁴ & Mark A. Kay¹

- One of several studies examining shRNA (i.e., does not bypass Exportin 5)
- shRNA-expressing adeno-associated virus introduced at 100 billion to 1 trillion particles
- Liver toxicity strongest at the highest dose
- Shorter shRNAs (19 nt) were not toxic

Effective RNAi-mediated gene silencing without interruption of the endogenous microRNA pathway

Matthias John¹, Rainer Constien¹, Akin Akinc², Michael Goldberg³, Young-Ah Moon⁵, Martina Spranger⁶, Philipp Hadwiger¹, Jürgen Soutschek¹, Hans-Peter Vornlocher¹, Muthiah Manoharan², Markus Stoffel⁶, Robert Langer^{3,4}, Daniel G. Anderson⁴, Jay D. Horton⁵, Victor Kotliansky² & David Bumcrot²

- Synthetic siRNA in liposomal formulation
- High dose: 5 mg/kg; low dose: 2 mg/kg
- 25 g mouse: ~10 quadrillion siRNA molecules
- Specific targets effectively silenced
- **Neither toxicity nor reduction in liver miR-122 were found**

Saturation of the RNAi machinery

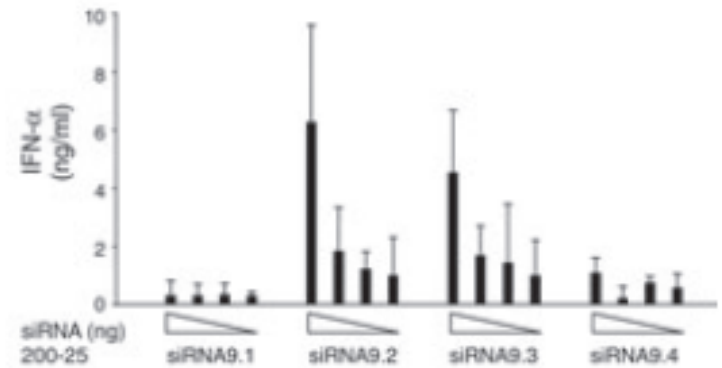
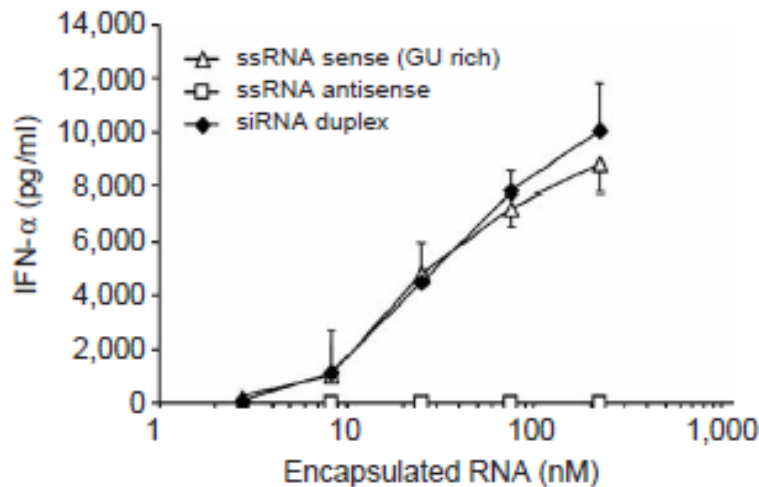
Transfection of small RNAs globally perturbs gene regulation by endogenous microRNAs

Aly A Khan^{1,2}, Doron Betel², Martin L Miller^{2,3}, Chris Sander², Christina S Leslie^{2,5} & Debora S Marks^{4,5}

- Examined numerous published datasets
- *In vitro* studies
- Targets of (other) endogenous miRNAs were significantly upregulated at RNA level
- Low fold changes
- Low dose was 100,000 copies per cell

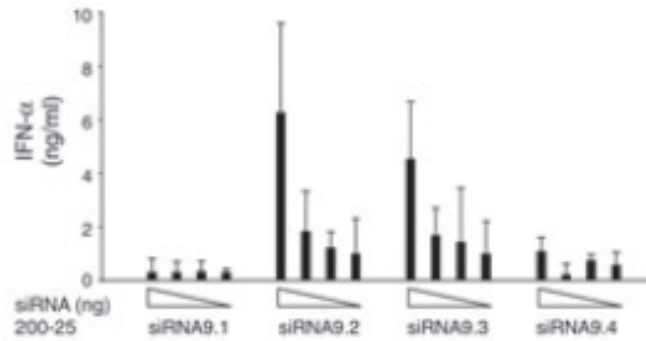
Sequence-dependent stimulation of the mammalian innate immune response by synthetic siRNA

Adam D Judge, Vandana Sood, Janet R Shaw, Dianne Fang, Kevin McClintock & Ian MacLachlan



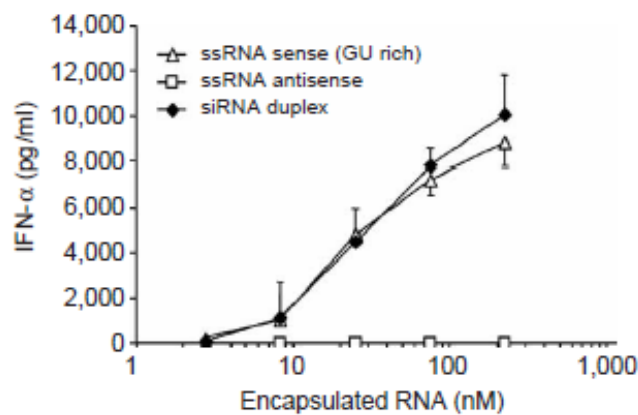
Sequence-specific potent induction of IFN- α by short interfering RNA in plasmacytoid dendritic cells through TLR7

Stimulation of the innate immune system



By the numbers: Hornung, et al.

- Cultured 50,000 pDCs per well
- Added 25 to 200 ng siRNA per well
- 2 trillion to 16 trillion copies of siRNA per well
- =40 million to 320 million copies per cell

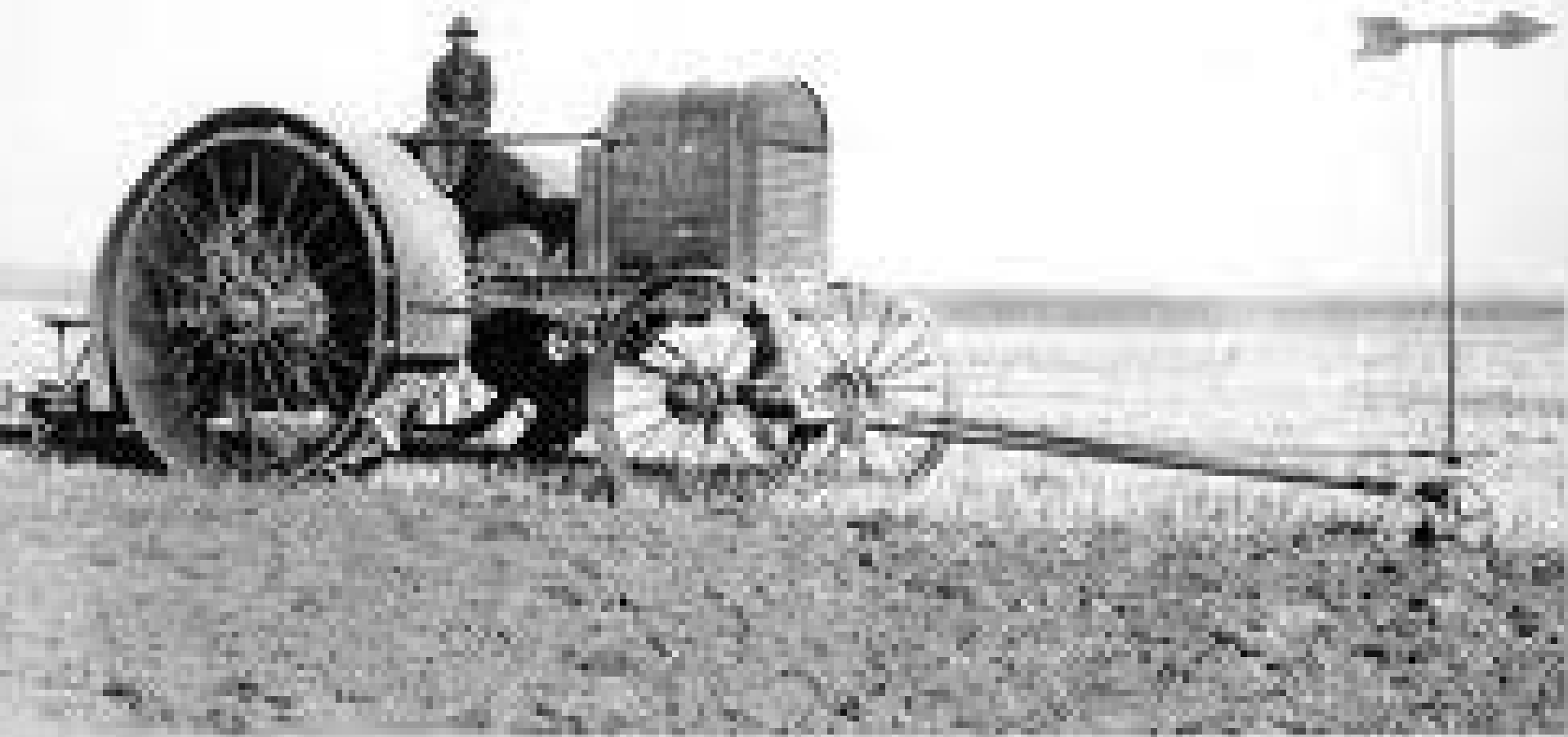


Stimulation of the innate immune system

By the numbers: Judge, et al.

- 50 ug injections; 2 mg/kg > 4 quadrillion molecules/mouse
- Low dose for effect *in vitro*: 10 nM w/ transfection
 - No stimulation without transfection!
 - PBMC, 200,000/well
 - 6 million copies/cell

- Federal Insecticide Act of 1910
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA): 1947



Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA): 1947

- Prompted by widespread use of potentially dangerous synthetic organic pesticides
- Included herbicides
- All new products to be registered with USDA



- Labeling: contact info, ingredients, warnings, directions
- Little enforcement mechanism

FIFRA amendments: 1959, 1964

- 1959
 - Nematicides
 - Additional plant controls: desiccants, defoliant

- 1964
 - Federal ID number intro'd
 - Mandate of toxicity-related keywords
 - Authority to stop sale of hazardous pesticides:
Secretary of Agriculture



1970s

- EPA formed (1970)—for FIFRA
- 1972 Environmental Pesticide Control Act
 - General use
 - Restricted use (certification required)
 - EPA could deny registration if adverse effects



- 1975 Amendment
 - Scientific Advisory Panel mandated for review of regulations
 - Secretary of Agriculture and economic impact

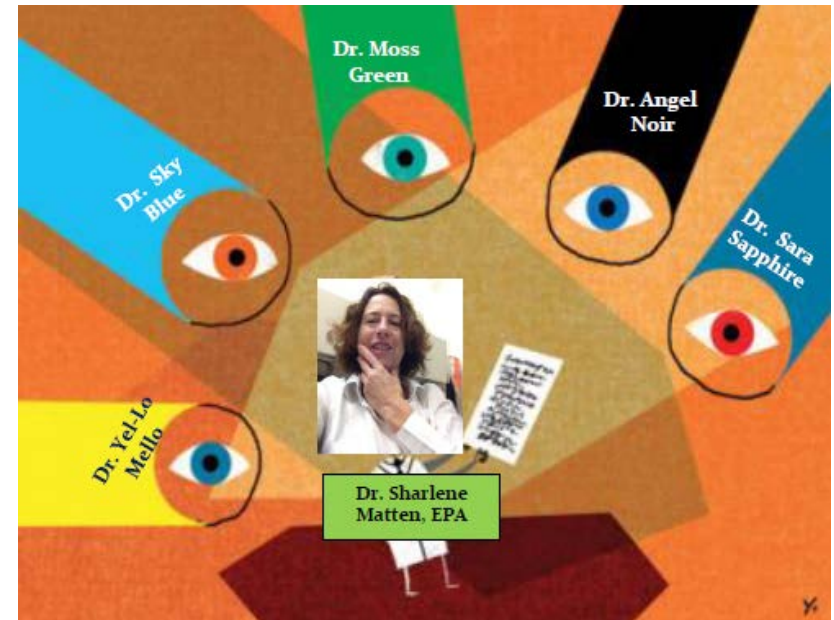
Today: EPA

- “...regulate the use and sale of pesticides to protect human health and preserve the environment”
 1. Put the burden of proof on the manufacturer for suitability, lack of adverse effects
 2. Enforce decisions re: banned products
 3. Establish regulatory framework



FIFRA SAP per 1972 Federal Advisory Committee Act and following...

- Public deliberation
- Public participation
- Minutes within 90 days
- 5-7 meetings per year
- Process for each



is shepherded by a designated federal official

- 7 NIH, NSF permanent members + ad hoc

Purposes of the FIFRA-SAP

- Improve effectiveness and quality of:
 - scientific analyses, reports and operating guidelines
 - scientific testing and of data submitted to EPA
- Peer review major scientific studies
- Scientific basis underlying pesticide regulatory activities
- Enhance EPA's scientific credibility and integrity



Most common topics for FIFRA meetings

Product(s) or Program	Science Issue(s)	Number of Meetings
Plant-Incorporated Protectants	Human health and/or ecological risk assessment, and/or IRM	11
Bt corn and Bt cotton PIPs	IRM (primary focus)	6
Atrazine	Human Health: cancer and non-Cancer risk, Epidemiology studies, Incident data Environmental Fate: surface water monitoring, drinking water Ecological effects: aquatic ecosystem -- plants, amphibians, invertebrates	8
Endocrine Disruptor Screening Program	Human health and ecological effects: Tier 1 battery, Tier 2 studies, Weight of Evidence, Prioritization using computational toxicology methods	7

2012-2014

2012	SAP Topics
Jan 31 - Feb 2, 2012	Common Aquatic Effects Assessment Methodology Developed in the Office of Pesticide Programs and Office of Water
March 6-7, 2012	Methods for Efficacy Testing of Bed Bug Pesticide Products
April 10-12, 2012	Health Effects of Chlorpyrifos
June 12-15, 2012	Problem Formulation for the Reassessment of Ecological Risks from the Use of Atrazine
Sept 11-14, 2012	Pollinator Risk Assessment Framework
2013	
Jan 29 - 31, 2013	Prioritizing the Universe of Endocrine Disruptor Screening Program (EDSP) Chemicals Using Computational Toxicology Tools
Mar 19-21, 2013	Draft Product Performance Data Needs Assessment for Products Claiming Efficacy Against Invertebrate Pests
May 21-23, 2013	Endocrine Disruptor Screening Program (EDSP) Tier 1 Screening Assays and Battery Performance
June 25-28, 2013	Endocrine Disruptor Screening Program (EDSP) Tier 2 Ecotoxicity Tests
Jul 30-Aug 2, 2013	Weight-of-Evidence: Evaluating Results of EDSP Tier 1 Screening
Dec 4-5, 2013	Corn Rootworm Resistance Monitoring for Bt corn Plant Incorporated Protectants (PIPs)
2014	
Jan 28, 2014	RNAi Technology as a Pesticide: Problem Formulation for Human Health and Ecological Risk Assessment

Human Health Considerations

Question 1. Please discuss the nature and extent of uncertainty in the specificity of long sequences of dsRNA targeted at pest species, if bioinformatic analysis shows no significant similarity to mammalian genes?

Question 2. Based on data indicating degradation of the majority of dsRNA in the digestive system, please discuss the strengths and limitations in concluding there will not be significant absorption of dsRNA with possible mammalian effects on oral exposure?

Question 3. To what extent does the specific structure of dsRNA, if it is super coiled or in a hairpin structure, make it more likely to survive degradation in the gut and lead to possible mammalian effects with oral exposure?

Environmental Considerations

Question 4. Environmental fate of dsRNA and tests needed

Question 5. Routes of exposure and non-target taxa

*Question 6. Off-target effects in non-target organisms;
information needed to reduce uncertainty*

*Question 7. Current Framework
Non-target organism and off-target effects testing;
role of bioinformatics;
other information needed*

Human

Environmental

1

2

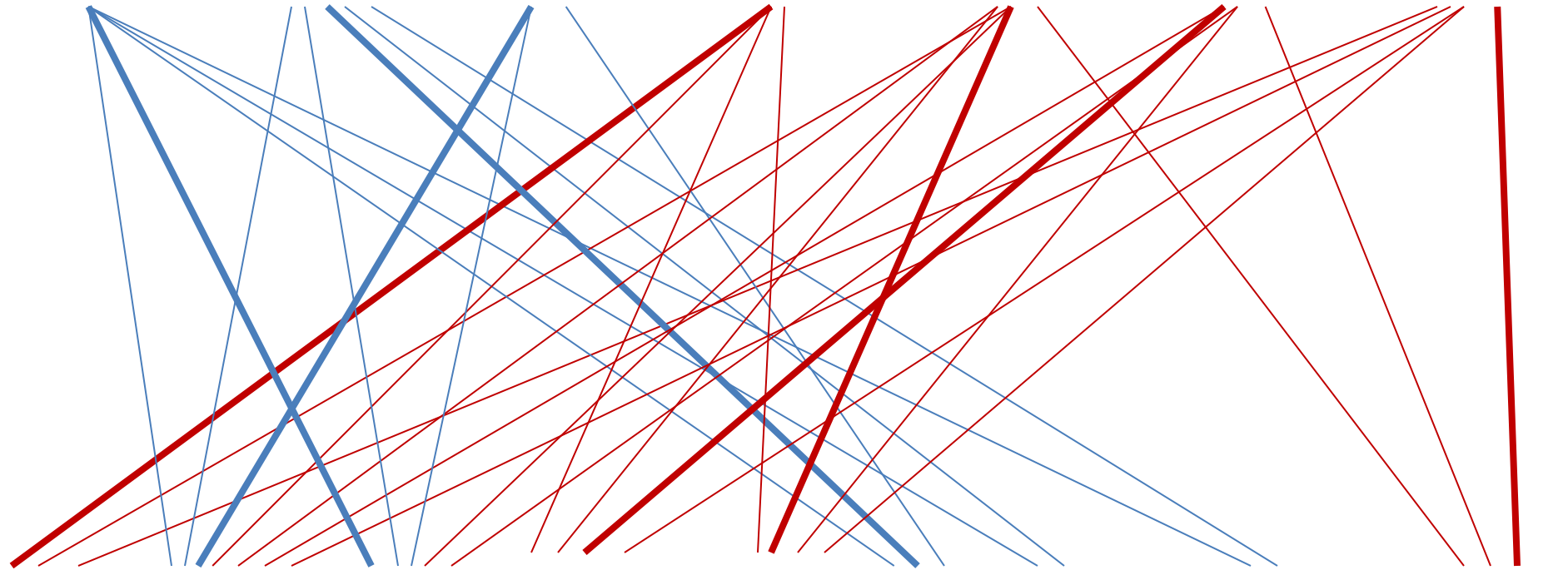
3

4

5

6

7



Cobb *Gregory* *Oppert* *Lundgren* *Smagghe* *Witwer* *Delclos* *McManaman* **Klaine**

Ad hoc members

Permanent members

To keep in mind...

- Guidance, not policy
- Unanimity not required
 - “a panel member suggested that...”
- Separation between the Charge Questions required and enforced before and after the meeting
- The FIFRA SAP meetings usually last two days;
 - RNAi meeting: one day

EFSA workshop

Risk assessment considerations for RNAi-based GM plants

June 4-5, 2014
Brussels, Belgium



- Molecular biology of RNAi
 - Fire, Vaucheret, Meister, Bellés
- RNAi-based GM plant applications
- Risk assessment considerations

EFSA Day 2: Three Workshops

- Molecular characterization
- Food/feed risk assessment
- Environmental risk assessment
 - Different emphases, but each break-out session included deliberation on off-target effects
- Participants
 - Regulatory officials; citizens' groups; academic scientists; industry scientists and representatives; consultants

EPA and EFSA: an outcome?

Science and other considerations...

EPA and EFSA

- **Significant uptake? No.**
 - **Functional consequences unlikely...**but PiP-specific studies needed (?)
 - **Degradation in the mammalian gut...**but in the sick? Spray applications? And are dermal/inhalation tests needed?
 - Other questions: Microbiome?
- **Significant uptake?** Unknown.
 - **Function:** no consensus on off-target effects
 - Saturation of the endogenous machinery **unlikely**
 - Immune stimulation (?)
 - RNA in the air, breathed by workers or public?
 - Other questions: Microbiome?