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Ethical considerations in the design and conduct of a cluster-randomised mycotoxin mitigation trial in Tanzania

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OPINION ARTICLE

Abstract

Aflatoxins are fungal metabolites that commonly contaminate staple food crops in tropical regions. Acute aflatoxin consumption in very high concentration causes aflatoxicosis and acute liver failure, while chronic, moderate levels of intake cause hepatocellular carcinoma. The effects of frequent moderate- to high-level exposure during infancy, however, is less clearly understood. Half a billion people in low- and middle-income countries continue to be exposed to aflatoxins through dietary consumption, in part because of lack of enforcement of regulatory limits and few feasible long-term mitigation options in these settings. Several epidemiologic studies have shown an association between aflatoxin exposure in infants and young children and growth failure, but strong experimental evidence is lacking. The Mycotoxin Mitigation Trial conducted in Tanzania was a cluster-randomised trial to assess the effect of a reduced aflatoxin diet on linear growth. Prior to the design and implementation of this trial, a group of multi-disciplinary and multi-national scientists reviewed literature in biomedical, public health, environmental health ethics. In this paper we outline the most salient ethical questions and dilemmas in the potential conduct of such a study and describe the ethical precedents and principles that informed our decision-making processes and ultimate study protocol.

Keywords: aflatoxin, bioethics, infant growth

1. Introduction

Research conducted with human subjects is informed and regulated by multiple guidelines, codes of practice and declarations including The Nuremberg Code, Declaration of Helsinki, Belmont Report, International Ethical Guidelines for Biomedical Research involving Human Subjects and Good Clinical Practice guidelines (Council for International Organizations of Medical Sciences (CIOMS), 2016; International Council for Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH), 1997; Katz, 1996; The National Commission for the Protection of Human Subjects of

Biomedical and Behavioral Research, 1979; World Medical Association, 2013). Many of the basic principles described in these documents are codified into national laws. Relying on these guidelines and laws, national and institutional ethical review boards are empowered to determine the ethical acceptability and permissibility of specific research design, conduct and analysis.

Even with extensive guidance on the conduct of human subject research, debates and quandaries in research ethics arise. These debates often highlight the vastly divergent contexts in which research is carried out around the world. Researchers are challenged to know whether and

how to account for these contextual differences, especially when those differences generate the need for research. Different fields of study have divergent, possibly conflicting objectives. For example, clinicians have a duty to protect individual patients whereas public health researchers are concerned for the health of entire populations and communities. Debates also arise as researchers are pushing boundaries of conventional research methods to understand and find solutions to complex, multi-faceted problems including climate change, poverty, food security, and food safety in a globally integrated food system.

Research into mycotoxins and human health encompasses all of these challenges. Understanding and controlling hazardous substances in our food system is a critical goal for agricultural scientists, nutritionists, toxicologists and microbiologists. Dietary staples, such as grains and nuts, are frequently contaminated with secondary metabolites of fungal colonisation. When toxic these metabolites are called mycotoxins. Aflatoxins (AF) are an important family of mycotoxins that most commonly contaminate maize and groundnut, during both the growth of crops in the field and again during storage. In high-income countries, AF is well-regulated and managed throughout the value chain, although at high cost. In the United States, for example, the cost of control, surveillance and loss of food crops due to AF are estimated to be \$47 million for maize and groundnuts annually (Vardon *et al.*, 2003).

In the face of such costs, and lacking strong regulatory infrastructures and feasible interventions to mitigate toxins, around 500 million people remain at risk of being chronically exposed to dietary AF at high levels in low- and middle-income countries (LMICs) (Pitt *et al.*, 2012; Visser *et al.*, 2020; Wu *et al.*, 2014a). Low-resource and rural communities typically have restricted dietary diversity, and tend to be at greatest risk of contaminated food supplies (Pitt *et al.*, 2012; Wild *et al.*, 2015). Chronic AF consumption can lead to liver cancer and ingestion of very high levels causes acute toxicosis and possibly death (IARC, 2002; Lewis *et al.*, 2005; Williams *et al.*, 2004).

There is now a significant body of literature assessing the effect of AF consumption on infant growth. A 2019 systematic review identified two randomised controlled trials (RCT) and 29 observational and prospective cohort studies studying this relationship, but the authors concluded that the overall quality of evidence was low due to risk of bias and inconsistency in the reported outcomes, measurement method and exposure period, as well as failure to adjust for confounders (Tsfamariam *et al.*, 2019). Our internal review found that regions with the highest levels of AF contamination and intake, multiple studies have shown a positive association between AF exposure and growth faltering, suggesting a significant dose-response relationships and a possible threshold of effect (Gong *et*

al., 2002, 2003, 2004; Mahfuz *et al.*, 2020; Mitchell *et al.*, 2017; Turner *et al.*, 2007; Watson *et al.*, 2018). To generate strong causal evidence for the relationship between AF and stunting, we conducted a cluster-randomised trial (CRT) to assess the effect of AF on linear growth in infants and young children (Phillips *et al.*, 2020).

2. Unique ethical dilemmas in this study

As with any research on human subjects, we received ethical approval for the study through Cornell's Institutional Review Board and Tanzania's National Institute for Medical Research. Both bodies approved the research application following minor clarifications in study protocol. In accordance with Good Clinical Practices, we formed a Data Safety and Monitoring Board (DSMB), comprised of a Tanzanian biostatistician, nutritionist and paediatrician. We shared anthropometric data with the DSMB every six months during the trial, as well as immediate notice of any adverse events.

However, because this research involved exposure to toxins in a low-resource setting, we felt it was necessary to go beyond the typical ethical approvals at multiple points throughout the planning process. We initiated consultations with other researchers working in related fields and performed a literature review focused in biomedical, public health and environmental health ethics to identify the most salient ethical complexities and questions for this study. Below we describe four key questions pertinent to this research study and share our responses to them.

Question 1: Given what is already known about the health effects of AF, should a question about the relationship between AF and child growth be studied further in human subjects?

Human subject research must meet certain ethical criteria to be conducted. These include: (1) social and/or scientific value, (2) scientific validity, (3) risk minimisation and a favourable risk/benefit ratio, (4) respect for subjects, (5) informed consent, (6) independent review, (7) fair subject selection, (8) protection of confidentiality and privacy, and (9) protection of vulnerable subjects (US HHS, 2018; Emanuel *et al.*, 2000, 2004; ICH, 1997; Resnik, 2008a). The first four criteria have significant complexity and ultimately rely on value judgements. The latter five were less difficult to meet for this research question, with clear, published guidance and therefore we do not focus on these here.

To have scientific or social value, research should lead to improvements in health, well-being or increase knowledge (Emanuel *et al.*, 2000; World Medical Association, 2013). This research question is important because the majority of the pathways and contributors to stunting remain unexplained even though the negative effects of child

the dynamics of AF exposure are highly variable, by the time sample outliers would be identified, the properties of food consumed by the individual would undoubtedly differ from those consumed when the sample was taken. The results of the analysed samples would not be relevant by the time it could be reported.

Given that AF biomarker and food testing fail to meet the criteria for sharing results described by the NBAC and needing to first consult with the Tanzanian authorities, we designed protocols for sharing results in the case of outlying values for food and biomarker specimens. These are described in detail in our trial protocol ([ClinicalTrials.gov](https://clinicaltrials.gov/ct2/show/study/NCT03940547) identifier: NCT03940547). Briefly, for blood and urinary biomarker reporting, we decided to report the percent of samples above 1000 pg/mg to local authorities. We subjectively chose this cut-off because these are these are levels usually found in the highest quintile in other high-risk countries and we believed that this threshold represented our best estimate to identify this as a reporting concern. For urinary aflatoxin M₁ data, there is no evidence to determine a cut point, so we were unable to take any action based on those analyses.

The legal limit for total AF allowed in foods at the point of sale in Tanzania is 10 µg/kg (Anonymous, 2004). There are no set standards for AF in IYC foods in Tanzania or East Africa. We chose a limit of 5 µg/kg for total AF as a more stringent cut off for IYC foods in our research project. Given the documented AF problem in the region of the research site and our formative research in this location, and the significant amount of food grown and sold outside of regulated markets, we decided to respond to exceptionally high levels of AF in for food samples. We decided to report the percent AF >1000 µg/kg in maize or >5,000 µg/kg in groundnut to the local authorities. We subjectively chose these cut-offs because these are these are levels usually found in the highest quintile in other high-risk countries and we estimate that maize is consumed five times as much as groundnut. If a second food sample from the same household were above these cut-offs we would make a home visit to the family to assess the health of the infant and understand more the food security and food quality issues in the household, particularly as they pertain to the infant and possibly refer the infants to health and agricultural authorities.

3. Discussion and conclusions

As researchers attempt to understand and find solutions to complex, multi-faceted problems that affect people in low-resource contexts, they must grapple with ethical questions that are unique to the type of research and the conditions and inequities of those settings. We have made our planning and decision-making processes transparent to assist other

researchers when the nuances of their ethical questions are not addressed by guidelines or statements.

We can very broadly share the lessons learned through our planning experiences. Research conducted with teams of multi-disciplinary and multi-national professionals brings a wide variety of perspectives and viewpoints. The process of considering ethical aspects of this study was enhanced by having a diverse team of experts from multiple research backgrounds, and intentionally establishing a structure of multi-national leadership and oversight positions. With such a diverse group, throughout our planning process there were some areas that required multiple conversations to come to consensus. For example, we faced disagreement around if and when to report food, blood and urine results to participants given the lack of precision about their implications and limited options to sustainably remove toxins. To structure and guide our decision-making in these cases, we explored the literature about recommendations and precedents for reporting results in similar instances. Then we jointly and iteratively reviewed and discussed our protocols until there was accord.

Our funder, The Bill & Melinda Gates Foundation, initiated this research and agreed to fund us to perform an ethical review prior to developing a full research proposal, and further conducted an external review of the final research proposal prior to its acceptance. We benefited by having a multi-year planning process to explore these decisions and flexibility in all trial and intervention design decisions. These factors allowed us to help ensure open discussions, sharing of beliefs and opinions, and building of trust among stakeholders. This approach provided transparency and objectivity in developing, running and reporting of the study.

Given the importance of stunting as a problem of global child health and the vulnerability of many families and children to chronic consumption of AF-contaminated food systems, we were strongly motivated to conduct this research. We recognise that there are no definitive answers to these questions and others might come to different conclusions. Yet we believe this research is valuable, not only to better understand the problem, but to motivate action to improve it.

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Conflict of interest

The authors declare no conflict of interest.

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