

Herbal hepatotoxicity: Challenges and pitfalls of causality assessment methods

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totoxicity cases, compared to numerous other causality assessment methods, which are inferior on various grounds. Among these disputed methods are the Maria and Victorino scale, an insufficiently qualified, shortened version of the CIOMS scale, as well as various liver un-specific methods such as the *ad hoc* causality approach, the Naranjo scale, the World Health Organization (WHO) method, and the Karch and Lasagna method. An expert panel is required for the Drug Induced Liver Injury Network method, the WHO method, and other approaches based on expert opinion, which provide retrospective analyses with a long delay and thereby prevent a timely assessment of the illness in question by the physician. In conclusion, HILI causality assessment is challenging and is best achieved by the liver specific CIOMS scale, avoiding pitfalls commonly observed with other approaches.

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Key words: Herbal hepatotoxicity; Herb induced liver injury; Herbs; Drug hepatotoxicity; Drug induced liver injury; Causality assessment

Abstract

The diagnosis of herbal hepatotoxicity or herb induced liver injury (HILI) represents a particular clinical and regulatory challenge with major pitfalls for the causality evaluation. At the day HILI is suspected in a patient, physicians should start assessing the quality of the used herbal product, optimizing the clinical data for completeness, and applying the Council for International Organizations of Medical Sciences (CIOMS) scale for initial causality assessment. This scale is structured, quantitative, liver specific, and validated for hepatotoxicity cases. Its items provide individual scores, which together yield causality levels of highly probable, probable, possible, unlikely, and excluded. After completion by additional information including raw data, this scale with all items should be reported to regulatory agencies and manufacturers for further evaluation. The CIOMS scale is preferred as tool for assessing causality in hepa-

Core tip: This review focuses on diagnostic causality assessment algorithms that have been used so far in herb induced liver injury (HILI) cases. Detailed information of the various methods with their strengths and weaknesses is provided including their challenges and pitfalls that emerged during the assessing course. For the physician caring for a patient with suspected HILI, the Council for International Organizations of Medical Sciences (CIOMS) scale is the preferred tool for assessing causality compared to numerous other causality assessment methods, which are inferior on various grounds. CIOMS based assessment should start at the day HILI is suspected to ensure completeness of clinical data.

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INTRODUCTION

A total of 60 herbs, herbal drugs, and herbal dietary supplements have been reported to cause herb induced liver injury (HILI), though convincing causality assessment rarely was provided^[1]. Presented as a tabular compilation, these 60 different herbal products were based on a recent analysis of 185 case reports, spontaneous reports, review articles, and comments. The consideration of possible hepatotoxicity in various reports has been discussed by the National Institutes of Health (NIH) in their recently released LiverTox database, covering a selected group of herbal and dietary supplement (HDS) products^[2,3]. Among these are: Aloe vera, Black cohosh (BC), Cascara, Chaparral, Chinese and other Asian herbal medicines (*Ba Jiao Lian*, Chi R Yun, Ephedra, *Jin Bu Huan*, Sho Saiko To and Dai Saiko To, *Shou Wu Pian*), Comfrey, Fenugreek, Germander, Ginkgo, Ginseng, Glucosamine, Greater Celandine, Green Tea, Hoodia, Horse Chestnut, Hyssop, Kava, Margosa Oil, Milk Thistle, Noni, Pennyroyal, St John's Wort, Saw Palmetto, Senna, Skullcap, Usnic acid, Valerian, and Yohimbine^[2,3]. However, causality confirmation was surprisingly rare for individual cases of suspected herbal hepatotoxicity, which often were published as narrative and anecdotal reports without valid and transparent data collection^[1-3] that require stringent efforts for causality attribution^[4].

The focus of this review is on causality assessment methods for herbal hepatotoxicity with particular reference to liver specific evaluation methods. This approach gives insight into challenges and pitfalls of these methods with surprising clinical and regulatory issues. Valid causality assessment of assumed HILI cases is required for further case evaluations, otherwise speculations and fruitless discussions will emerge.

DATA BASIS FOR CAUSALITY ASSESSMENT

Herbal product essentials

Herbal product quality aspects are of primary concern, the respective evaluation should start at the day HILI is suspected. The products are destined for human use and must meet the highest possible quality based on specific standards (Table 1)^[4-7]. Despite fulfilment of quality standards, batch and product variability is common^[4,8-10]. Therefore, additional specific production quality standards have been described, for instance, as a proposal for a Kava Quality Standardization Code^[8]. It details standardization of overall herbal quality and specifically addresses chemical, agricultural, manufacturing, nutritional, regulatory, and legislation standardizations. In addition, labelling and consumer leaflet of herbal drugs and herbal dietary supplements should mandatorily provide

a clear definition and identification of the plant family, subfamily, species, subspecies, and variety as classical botanical description for any herb used as an ingredient of a herbal product (Table 1)^[4,8].

As an example, several hundred kava varieties exist^[8-11], but specific information on kava variety identification was missing in all spontaneous reports and case report publications of suspected hepatotoxicity. This leaves open which kava variety had to be incriminated^[9-17]. On the other hand, the regulatory recommendation for kava drugs was to use its peeled rhizome^[8,11,15]. In various HILI cases, it remained unclear, whether unpeeled rhizomes, peeled and unpeeled roots, and/or stem peelings were also used^[8,11,16,17]. This again hampered any evaluation of the causative agent of kava hepatotoxicity^[16,17]. For both the United States Food and Drug Administration and the Australian Therapeutic Goods Administration, peeled kava rhizomes were recommended for kava supplements^[18,19].

Another point of interest focuses on solvents and solubilizers without regulatory advice^[8,11,15,16], as well as on adulterants, impurities, contaminants, or misidentified herbs^[4,7,8,11]. These key issues of herbal product quality are rarely addressed in publications related to herbal hepatotoxicity^[1,4,8-17,20-33].

Clinical data requirements

Other concerns focus on incomplete clinical evaluation. Beginning at the day HILI is suspected, the physician has to gather all necessary information for an accurate diagnosis and the exclusion of alternative causes under relevant clinical aspects (Tables 1 and 2)^[1,4,13,14,17,20-26,34-59]. Hepatotoxicity requires strict criteria, best defined by alanine aminotransferase (ALT) and/or alkaline phosphatase (ALP) values^[4]. Its increases are expressed in multiples of the upper limit of their normal range as $N^{[60-62]}$. For ALT, hepatotoxicity has been defined from $> 2N^{[60,62]}$, $> 3N^{[63]}$ or $> 5N^{[64]}$, while ALP values of $> 2N$ are commonly considered diagnostic^[60,62]. Restricting ALT increases to $> 5N$ will eliminate false positive cases and substantiate causality at a higher level of probability^[64]. Considering patients with $ALT > 2N$ will include numerous cases with nonspecific increases, with higher requirements for thorough assessment and more stringent exclusion of causes unrelated to the herb(s) under discussion. Also for low threshold N values, the rate of alternative diagnoses must be higher^[13,14,24-26,35-39], and missing a hepatotoxicity definition results in false high case numbers due to overdiagnosing and overreporting^[17,23-26,38,39]. Special care is required for reporting of confounding variables^[4,13,14,18,24,39]. For clinicians, a checklist with all clinical details is available for most alternative diagnoses (Table 2)^[62].

Checklist

For a pragmatic approach to assess causality, special attention by the physician is of utmost importance. Only this physician can arrange collection and assessment of all data, thereby providing good data quality. To achieve this, a checklist with all important product and clinical items (Tables 1 and 2) and a valid causality assessment

Table 1 Essential steps of herbal hepatotoxicity assessments

Quality specifications
Herbal product quality
Good agricultural practices
Good manufacturing practices
Definition of plant family, subfamily, species, subspecies, and variety
Definition of plant part
Definition of solvents and solubilizers
Lack of impurities, adulterants, and misidentifications
Minimum of batch and product variability
Lack of variety to variety variability
Clinical assessment quality
Brand name with details of ingredients, plant parts, batch number, and expiration date
Identification as herbal drug or herbal supplement
Herb as an ingredient of a polyherbal product or an undetermined herbal product
Manufacturer with address
Indication of herbal use with dates of symptoms leading to herbal treatment
Daily dose with details of the application form
Exact date of herb start and herb end
Accurate dates of emerging new symptoms after herb start in chronological order
Accurate date of initially increased liver values
Timeframes of challenge, latency period, and dechallenge
Verification or exclusion of a temporal association
Provided temporal association is verified, evaluation of a causal relationship
Gender, age, body weight, height, body mass index
Ethnicity, profession
Past medical history regarding general diseases and specifically liver diseases
ALT value initially including normal range
ALT values during dechallenge at least on days 8 and 30, as well as later on
ALT values during dechallenge to exclude a second peak
ALT normalization with exact date and actual value
ALP value initially including normal range
ALP values during dechallenge up to 180 d, as well as later on
ALP values during dechallenge to exclude a second peak
ALP normalization with exact date and actual value
AST value initially including normal range
Laboratory criteria for definition of hepatotoxicity and its pattern
Definition of risk factors such as age and alcohol
Alcohol and drug use
Statement regarding actual treatment including steroids or ursodesoxycholic acid
Assessment of preexisting and coexisting liver unrelated diseases
Assessment of preexisting and coexisting liver diseases
Consideration of the several hundreds of other possible liver diseases
Providing details to exclude alternative diagnoses
Assessment and exclusion of hepatitis A virus, hepatitis B virus, hepatitis C virus, hepatitis E virus, cytomegalovirus, Epstein-Barr virus, HSV, VZV
Liver and biliary tract imaging including color Doppler sonography of liver vessels
Specific evaluation of alcoholic, cardiac, autoimmune, and genetic liver diseases
Individual quantitative score of each alternative diagnosis
Comedicated synthetic drugs, herbal drugs, herbal and other dietary supplements
Definition of and search for accidental, unintended reexposure
Assessing of unintended reexposure
Search for evidence of prior known hepatotoxicity of the suspected herb
Assessing of known hepatotoxicity caused by the herb
Qualified data acquisition and documentation of complete data
Transparent presentation of all data
Causality assessment quality
Prospective assessment by the physician suspecting herb induced liver injury
Structured and quantitative method
Liver specific causality assessment method validated for hepatotoxicity
Use of the CIOMS scale
Gathering of all data required for the CIOMS scale item by item
Presentation of individual CIOMS items and of scores to regulatory agency
Gathering all clinical data and presentation to regulatory agency
Excluding all alternative causes and presentation to regulatory agency
Regulatory case assessment by skilled hepatologist with clinical experience
Regulatory assessment with assistance of external experts
Transparent presentation of regulatory verified causality assessment results

Required quality specifications of herbal products refer to herbs, herbal drugs, and herbal supplements including herbal mixtures. ALT: Alanine aminotransferase; ALP: Alkaline phosphatase; AST: Aspartate aminotransferase; CIOMS: Council for International Organizations of Medical Sciences; HSV: Herpes simplex virus; VZV: Varicella zoster virus.

Table 2 Check list for herb induced liver injury diagnosis

Items to be assessed	Information obtained		
	Yes	No	Partial
Brand name with batch number and expiration date	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indication of herbal use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dates of symptoms leading to herbal treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Daily dose	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Application form of herbal product	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exact date of herb start	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exact date of herb end	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accurate dates of emerging new symptoms after herb start in chronological order	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accurate date of initially increased liver values	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Time frame of challenge	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Time frame of latency period	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Time frame of dechallenge	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Verification of temporal association	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exclusion of temporal association	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender, age, body weight, height, BMI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethnicity, profession	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Past medical history and actual assessment regarding preexisting general diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Past medical history and actual assessment regarding preexisting liver diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk factors such as age and alcohol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quantification of alcohol and drug use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comedicated synthetic drugs, herbal drugs, herbal and other dietary supplements with all details of product, daily dose, exact dates of start and end of use, indication	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALT value initially including exact date and normal range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALT values during dechallenge at least on days 8 and 30, and later on, with exact dates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALT values during dechallenge to exclude a second peak, with exact dates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALT normalization with exact date and actual value	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALP value initially including exact date and normal range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALP values during dechallenge up to 180 d, and later on, with exact dates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALP values during dechallenge to exclude a second peak, with exact dates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ALP normalization with exact date and actual value	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AST value initially including normal range	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Laboratory criteria for definition of hepatotoxicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Laboratory criteria for injury pattern	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Liver and biliary tract imaging including hepatobiliary sonography, CT, MRT, MRC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Color Doppler sonography of liver vessels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unintended reexposure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Known hepatotoxicity caused by the herb	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consideration and exclusion of other possible causes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hepatitis A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-HAV-IgM			
Hepatitis B	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HBsAg, anti-HBc-IgM, HBV-DNA			
Hepatitis C	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-HCV, HCV-RNA			
Hepatitis E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-HEV-IgM, anti-HEV-IgG, HEV-RNA			
CMV	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CMV-PCR, titer change for anti-CMV-IgM and anti-CMV-IgG			
EBV	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EBV-PCR, titer change for anti-EBV-IgM and anti-EBV-IgG			
HSV	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HSV-PCR, titer change for anti-HSV-IgM and anti-HSV-IgG			
VZV	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VZV-PCR, titer change for anti-VZV-IgM and anti-VZV-IgG			
Other virus infections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific serology of Adenovirus, Coxsackie-B-virus, Echovirus, Measles virus, Rubella virus, Flavivirus, Arenavirus, Filovirus, Parvovirus, HIV, and others			
Other infectious diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specific assessment of bacteria, fungi, parasites, worms, and others			
AIH type I	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gamma globulins, ANA, SMA, AAA, SLA/LP, anti-LSP, anti-ASGPR			
AIH type II	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gamma globulins, anti-LKM-1 (CYP 2D6), anti-LKM-2 (CYP 2C9), anti-LKM-3			
PBC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AMA, anti-PDH-E2			

PSC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
p-ANCA, MRC			
AIC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANA, SMA			
Overlap syndromes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
See AIH, PBC, PSC, and AIC			
NASH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BMI, insulin resistance, hepatomegaly, echogenicity of the liver			
ALD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Patient's history, clinical and laboratory assessment, sonography			
DILI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Patient's history, clinical and laboratory assessment, sonography, use of the CIOMS scale			
Cocaine, ecstasy and other amphetamines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toxin screening			
Rare intoxications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toxin screening for household and occupational toxins			
Hereditary hemochromatosis	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Serum ferritin, total iron-binding capacity, genotyping for C2824 and H63D mutation, hepatic iron content			
Wilson's disease	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copper excretion (24 h urine), ceruloplasmin in serum, free copper in serum, Coombs-negative hemolytic anemia, hepatic copper content, Kayser-Fleischer-Ring, neurologic-psychiatric work-up, genotyping			
Porphyria	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Porphobilinogen in urine, total porphyrines in urine			
α 1-Antitrypsin deficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
α 1-Antitrypsin in serum			
Biliary diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clinical and laboratory assessment, hepatobiliary sonography, endosonography, CT, MRT, MRC			
Pancreatic diseases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clinical and laboratory assessment, sonography, CT, MRT			
Celiac disease	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TTG antibodies, endomysium antibodies, duodenal biopsy			
Anorexia nervosa	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clinical context			
Parenteral nutrition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clinical context			
Cardiopulmonary diseases with shock liver (cardiac hepatopathy, ischemic hepatitis)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cardiopulmonary assessment of congestive heart disease, myocardial infarction, cardiomyopathy, cardiac valvular dysfunction, pulmonary embolism, pericardial diseases, arrhythmia, hemorrhagic shock, and various other conditions			
Addison's disease			
Plasma cortisol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thyroid diseases			
TSH basal, T4, T3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grand mal seizures			
Clinical context of epileptic seizure (duration > 30 min)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heat stroke			
Shock, hyperthermia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Polytrauma			
Shock, liver injury	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Systemic diseases			
Specific assessment of <i>M. Boeck</i> , amyloidosis, lymphoma, other malignant tumors, sepsis and others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other diseases			
Clinical context	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For each listed item, detailed results obtained for the individual patient are to be supplemented within the checklist. BMI: Body mass index; ALT: Alanine aminotransferase; ALP: Alkaline phosphatase; AST: Aspartate aminotransferase; CT: Computer tomography; MRT: Magnetic resonance tomography; MRC: Magnetic resonance cholangiography; HAV: Hepatitis A virus; IgM: Immunoglobulin M; HBsAg: Hepatitis B antigen; HBe: Hepatitis B core; HBV: Hepatitis B virus; HCV: Hepatitis C virus; HEV: Hepatitis E virus; IgG: Immunoglobulin G; HIV: Human immunodeficiency virus; CMV: Cytomegalovirus; PCR: Polymerase chain reaction; EBV: Epstein Barr virus; HSV: Herpes simplex virus; VZV: Varicella zoster virus; AIH: Autoimmune hepatitis; ANA: Antinuclear antibodies; SMA: Smooth muscle antibodies; AAA: Anti-actin antibodies; SLA: Soluble liver antigen; LP: Liver-pancreas antigen; LSP: Liver specific protein; ASGPR: Asialo-glycoprotein-receptor; LKM: Liver kidney microsomes; CYP: Cytochrome P450; PBC: Primary biliary cirrhosis; AMA: Antimitochondrial antibodies; PDH: Pyruvate dehydrogenase; PSC: Primary sclerosing cholangitis; p-ANCA: Perinuclear antineutrophil cytoplasmic antibodies; AIC: Autoimmune cholangitis; NASH: Non alcoholic steatohepatitis; ALD: Alcoholic liver disease; DILI: Drug induced liver injury; CIOMS: Council for International Organizations of Medical Sciences; TSH: Thyroid stimulating hormone.

algorithm (Tables 3-6) should be applied early in the unfolding disease, beginning at the day HILI is suspected. Unless this is done in a stringent way, poor data quality will be provided to the scientific community, regulatory

agencies, expert panels, and manufacturers, disabling reevaluation of the case. Initially poor data will produce poor results and is unacceptable. Complete and excellent case data including raw data provided by the physician

Table 3 Methods of causality assessments for suspected herbal hepatotoxicity

Methods of causality assessment	Specific criteria of various causality assessment methods					
	Expert based	Structured	Qualitative	Quantitative	Liver specific	Liver validated
Prospective evaluation						
CIOMS scale	No	Yes	No	Yes	Yes	Yes
MV scale	No	Yes	No	Yes	Yes	Yes
Naranjo scale	No	Yes	No	Yes	No	No
KL method	No	Yes	Yes	No	No	No
<i>Ad hoc</i> approach	No	No	No	No	No	No
Retrospective evaluation						
DILIN method	Yes	Yes	Yes	No	Yes	No
WHO method	Yes	Yes	No	No	No	No
Expert opinion	Yes	No	No	No	Yes	No

Compilation of details are derived from previous reports^[2,3,60-62,76-79,81,89,102]. Council for International Organizations of Medical Sciences scale (CIOMS scale) refers to both the original scale^[60] and its update (Tables 5 and 6)^[62]. Liver-specific and liver-validated criteria reflect hepatotoxicity criteria. Expert based criterion refers to the requirement of several experts for the actual case under consideration. MV scale: Maria and Victorino scale; KL method: Karch and Lasagna method; DILIN method: Drug Induced Liver Injury Network method; WHO method: World Health Organization method.

Table 4 Details of the various causality assessment methods for herb induced liver injury

Assessed items with specific scores	CIOMS	MV	Naranjo	KL	<i>Ad hoc</i>	DILIN	WHO	Expert opinion
Time frame of latency period (score)	+	+	0	0	0	0	0	0
Time frame of challenge (score)	+	+	0	0	0	0	0	0
Time frame of dechallenge (score)	+	+	0	0	0	0	0	0
Recurrent ALT or ALP increase (score)	+	0	0	0	0	0	0	0
Definition of risk factors (score)	+	0	0	0	0	0	0	0
Verified alternative diagnoses (score)	+	+	0	0	0	0	0	0
Assessed HAV, HBV, HCV (score)	+	+	0	0	0	0	0	0
Assessed CMV, EBV, HSV, VZV (score)	+	+	0	0	0	0	0	0
Liver and biliary tract imaging (score)	+	0	0	0	0	0	0	0
Liver vessel Doppler sonography (score)	+	0	0	0	0	0	0	0
Assessed preexisting diseases (score)	+	0	0	0	0	0	0	0
Evaluated cardiac hepatopathy (score)	+	0	0	0	0	0	0	0
Excluded alternative diagnoses (score)	+	+	+	0	0	0	0	0
Comedication (score)	+	0	+	0	0	0	0	0
Prior known herbal hepatotoxicity (score)	+	+	+	0	0	0	0	0
Searched unintended reexposure (score)	+	+	+	0	0	0	0	0
Defined unintended reexposure (score)	+	+	0	0	0	0	0	0
Unintended reexposure (score)	+	+	0	0	0	0	0	0
Laboratory hepatotoxicity criteria	+	+	0	0	0	+	0	+
Laboratory hepatotoxicity pattern	+	+	0	0	0	+	0	+
Liver specific method	+	+	0	0	0	+	0	+
Structured, liver related method	+	+	0	0	0	+	0	0
Quantitative, liver related method	+	+	0	0	0	0	0	0
Validated method for hepatotoxicity	+	+	0	0	0	0	0	0

Items lacking specific scores were not considered, with the exception of the last six features. The data of the Drug Induced Liver Injury Network method are derived from the report of Rockey *et al.*^[102], references for the other methods are found in the text. Latency period indicates time from herb start to symptoms, alternatively to abnormal liver tests. The symbol + shows that this item is present and the symbol 0 indicates lack of this item. ALT: Alanine aminotransferase; ALP: Alkaline phosphatase; HAV: Hepatitis A virus; HBV: Hepatitis B virus; HCV: Hepatitis C virus; CMV: Cytomegalovirus; EBV: Epstein Barr virus; HSV: Herpes simplex virus; VZV: Varicella zoster virus; CIOMS: Council for International Organizations of Medical Sciences scale; MV: Maria and Victorino scale; KL: Karch and Lasagna method; DILIN: Drug-Induced Liver Injury Network method; WHO: World Health Organization method.

are necessary to circumvent later investigative efforts, subsequent discussions, and speculative conclusions.

At each step of the evaluation, full transparency of all data is mandatory. This includes a complete narrative medical history, a causality assessment based on an established algorithm, and presentation of all data as item by item and raw data, ready for reevaluation by other scientists. This is also relevant for case publications and case series analyses, which is indeed feasible as shown in the past^[13,14,25,35-39,58]. The same transparency is needed for

statements and publications by regulatory agencies and expert panels. Neglecting full transparency will cause concern and uncertainty about the validity of the presented conclusions.

GENERAL ASPECTS OF CAUSALITY EVALUATION

Method categories

Some reservations exist about the best method for causal-

Table 5 Updated Council for International Organizations of Medical Sciences scale for the hepatocellular type of injury with items required for causality assessment in herb induced liver injury cases

Items for hepatocellular injury	Possible score	Patient's score
Time to onset from the beginning of the herb		
5-90 d (rechallenge: 1-15 d)	+2	
< 5 or > 90 d (rechallenge: > 15 d)	+1	
Alternative: Time to onset from cessation of the herb		
≤ 15 d (except for slowly metabolized herbal chemicals: > 15 d)	+1	
Course of ALT after cessation of the herb		
Percentage difference between ALT peak and N		
Decrease ≥ 50% within 8 d	+3	
Decrease ≥ 50% within 30 d	+2	
No information or continued herbal use	0	
Decrease ≥ 50% after the 30 th day	0	
Decrease < 50% after the 30 th day or recurrent increase	-2	
Risk factors		
Alcohol use (drinks/d: > 2 for women, > 3 for men)	+1	
No alcohol use (drinks/d: ≤ 2 for women, ≤ 3 for men)	0	
Age ≥ 55 yr	+1	
Age < 55 yr	0	
Concomitant herbs(s) and drug(s)		
None or no information	0	
Concomitant herb or drug with incompatible time to onset	0	
Concomitant herb or drug with compatible or suggestive time to onset	-1	
Concomitant herb or drug known as hepatotoxin and with compatible or suggestive time to onset	-2	
Concomitant herb or drug with evidence for its role in this case (positive rechallenge or validated test)	-3	
Search for non drug causes		
Group I (6 causes)		
Anti-HAV-IgM		
HBsAg, anti-HBc-IgM, HBV-DNA		
Anti-HCV, HCV-RNA		
Hepatobiliary sonography/colour Doppler sonography of liver vessels/endsonography/CT/MRC		
Alcoholism (AST/ALT ≥ 2 IU/L)		
Acute recent hypotension history (particularly if underlying heart disease)		
Group II (6 causes)		
Complications of underlying disease(s)		
Infection suggested by PCR and titre change for		
CMV (anti-CMV-IgM, anti-CMV-IgG)		
EBV (anti-EBV-IgM, anti-EBV-IgG)		
HEV (anti-HEV-IgM, anti-HEV-IgG)		
HSV (anti-HSV-IgM, anti-HSV-IgG)		
VZV (anti-VZV-IgM, anti-VZV-IgG)		
Evaluation of group I and II		
All causes-groups I and II - reasonably ruled out	+2	
The 6 causes of group I ruled out	+1	
5 or 4 causes of group I ruled out	0	
Less than 4 causes of group I ruled out	-2	
Non herb cause highly probable	-3	
Previous information on hepatotoxicity of the herb		
Reaction labelled in the product characteristics	+2	
Reaction published but unlabelled	+1	
Reaction unknown	0	
Response to readministration		
Doubling of ALT with the herb alone, provided ALT below 5N before reexposure	+3	
Doubling of ALT with the herb(s) and drug(s) already given at the time of first reaction	+1	
Increase of ALT but less than N in the same conditions as for the first administration	-2	
Other situations	0	
Total score for patient		

The compilation of the individual items is adapted from the updated version of the Council for International Organizations of Medical Sciences (CIOMS) scale^[62] and the original CIOMS scale^[60]. The above items refer to the hepatocellular type of injury, whereas items for the cholestatic (± hepatocellular) type are presented in Table 6. Regarding risk factor of alcohol use, 1 drink commonly contains about 10 g ethanol^[2,3,90]. Total score and resulting causality grading: ≤ 0, excluded; 1-2, unlikely; 3-5, possible; 6-8, probable; ≥ 9, highly probable. HAV: Hepatitis A virus; IgM: Immunoglobulin M; ALT: Alanine aminotransferase; AST: Aspartate aminotransferase; CMV: Cytomegalovirus; CT: Computer tomography; EBV: Epstein Barr virus; HBc: Hepatitis B core; HBsAg: Hepatitis B antigen; HBV: Hepatitis B virus; HCV: Hepatitis C virus; HEV: Hepatitis E; HILL: Herb induced liver injury; HSV: Herpes simplex virus; MRC: Magnetic resonance cholangiography; N: Upper limit of the normal range; VZV: Varicella zoster virus.

Table 6 Updated Council for International Organizations of Medical Sciences scale for the cholestatic (\pm hepatocellular) type of injury with items required for causality assessment in herb induced liver injury cases

Items for cholestatic (\pm hepatocellular) injury	Possible score	Patient's score
Time to onset from the beginning of the herb		
5-90 d (rechallenge: 1-90 d)	+2	
< 5 or > 90 d (rechallenge: > 90 d)	+1	
Alternative: Time to onset from cessation of the herb		
≤ 30 d (except for slowly metabolized herbal chemicals: > 30 d)	+1	
Course of ALP after cessation of the herb		
Percentage difference between ALP peak and N		
Decrease ≥ 50% within 180 d	+2	
Decrease < 50% within 180 d	+1	
No information, persistence, increase, or continued herbal use	0	
Risk factors		
Alcohol use (drinks/d: > 2 for women, > 3 for men) and pregnancy	+1	
No alcohol use (drinks/d: ≤ 2 for women, ≤ 3 for men)	0	
Age ≥ 55 yr	+1	
Age < 55 yr	0	
Concomitant herbs(s) and drug(s)		
None or no information	0	
Concomitant herb or drug with incompatible time to onset	0	
Concomitant herb or drug with compatible or suggestive time to onset	-1	
Concomitant herb or drug known as hepatotoxin and with compatible or suggestive time to onset	-2	
Concomitant herb or drug with evidence for its role in this case (positive rechallenge or validated test)	-3	
Search for non drug causes		
Group I (6 causes)		
Anti-HAV-IgM		
HBsAg, anti-HBc-IgM, HBV-DNA		
Anti-HCV, HCV-RNA		
Hepatobiliary sonography/colour Doppler sonography of liver vessels/endsonography/CT/MRC		
Alcoholism (AST/ALT ≥ 2 IU/L)		
Acute recent hypotension history (particularly if underlying heart disease)		
Group II (6 causes)		
Complications of underlying disease(s)		
Infection suggested by PCR and titre change for		
CMV (anti-CMV-IgM, anti-CMV-IgG)		
EBV (anti-EBV-IgM, anti-EBV-IgG)		
HEV (anti-HEV-IgM, anti-HEV-IgG)		
HSV (anti-HSV-IgM, anti-HSV-IgG)		
VZV (anti-VZV-IgM, anti-VZV-IgG)		
Evaluation of group I and II		
All causes-groups I and II - reasonably ruled out	+2	
The 6 causes of group I ruled out	+1	
5 or 4 causes of group I ruled out	0	
Less than 4 causes of group I ruled out	-2	
Non herb cause highly probable	-3	
Previous information on hepatotoxicity of the herb		
Reaction labelled in the product characteristics	+2	
Reaction published but unlabelled	+1	
Reaction unknown	0	
Response to readministration		
Doubling of ALP with the herb alone, provided ALP below 5N before reexposure	+3	
Doubling of ALP with the herb(s) and drug(s) already given at the time of first reaction	+1	
Increase of ALP but less than N in the same conditions as for the first administration	-2	
Other situations	0	
Total score for patient		

The compilation of individual items is adapted from the updated version of the Council for International Organizations of Medical Sciences (CIOMS) scale^[62] and the original CIOMS scale^[60]. The above items refer to the cholestatic (\pm hepatocellular) type of injury, whereas items for the hepatocellular type are presented in Table 5. Regarding risk factor of alcohol use, 1 drink commonly contains about 10 g ethanol^[2,3,90]. Total score and resulting causality grading: ≤ 0, excluded; 1-2, unlikely; 3-5, possible; 6-8, probable; ≥ 9, highly probable. ALP: Alkaline phosphatase; N: upper limit of the normal range; HAV: Hepatitis A virus; IgM: Immunoglobulin M; HBsAg: Hepatitis B antigen; HBc: Hepatitis B core; HBV: Hepatitis B virus; HCV: Hepatitis C virus; CT: Computer tomography; MRC: Magnetic resonance cholangiography; AST: Aspartate aminotransferase; ALT: Alanine aminotransferase; PCR: Polymerase chain reaction; CMV: Cytomegalovirus; EBV: Epstein Barr virus; HEV: Hepatitis E virus; HSV: Herpes simplex virus; IgG: Immunoglobulin G; VZV: Varicella zoster virus.

ity assessment in hepatotoxicity cases^[1-4,13,14,17,21-26,34-39,59-64]. HILI case series reported in 23 publications with 573 HILI cases used various causality assessment meth-

ods^[12-14,23,25,34-36,38,39,53,54,65-75]. These can be classified into prospective and retrospective analyses (Table 3).

The prospective evaluation focuses on the physician

caring for a patient with suspected liver injury. This setting requires a readily available and time efficient method to evaluate causation that can adapt to further clinical and causality approach necessities. Candidates are the Council for International Organizations of Medical Sciences (CIOMS) scale, also called Roussel Uclaf Causality Assessment Method scale^[60-62], the Maria and Victorino (MV) scale^[76], the Naranjo scale^[77], the Karch and Lasagna (KL) method^[78], and the *ad hoc* approach^[79].

Retrospective evaluations are based on an expert panel evaluating reported or published case data, sometimes going back for months or years. Examples are the Drug Induced Liver Injury Network (DILIN) method^[73,80], the World Health Organization global introspection method (WHO method) as defined by the WHO Collaborating Centre for International Drug Monitoring^[81], and the expert opinion^[2,3]. Major differences exist (Table 3), especially when assessing items that require score attribution (Table 4).

Usage frequency

Analyzing 23 publications of initially assumed causality but not necessarily confirmed later on^[12-14,23,25,34-36,38,39,53,54,65-75] with HILI cases by BC, Greater Celandine, Green Tea extracts, some Herbalife products, Hydroxycut, kava, *Pelargonium sidoides*, and various herbs, the CIOMS scale was applied in 52.2%, the WHO method in 17.4%, the *ad hoc* approach in 13.1%, the Naranjo scale in 8.7%, and the KL and DILIN method each in 4.3% of these publications^[82]. Similar results were obtained when analyzing the frequency for the 573 cases: the CIOMS scale was used in 275 cases (48.0%), the WHO method in 134 cases (23.4%), the Naranjo scale in 64 cases (11.2%), the *ad hoc* approach in 63 cases (11.0%), the KL method in 20 cases (3.5%), and the DILIN method in 20 cases (3.0%)^[82]. For instance, the CIOMS scale was applied for Kava^[13,14,67], BC^[25,34,71,72], Greater Celandine^[35,36], *Pelargonium sidoides*^[38,39], and various herbs^[75], the WHO method for Kava^[65,68] and Herbalife products^[53,54], the *ad hoc* approach for Kava^[12,66] and Greater Celandine^[69], the Naranjo scale for BC^[23] and Green Tea extracts^[70], the KL method for Herbalife products^[74], and the DILIN method for Hydroxycut^[8]^[73].

A systematic analysis of causality methods is also available for DILI cases^[83]. In 2008, 61 DILI publications in the PubMed database over the last decade were reviewed. It revealed that in 38 publications (62.3%) no specific causality assessment method was mentioned; presumably, the evaluation was based on the *ad hoc* approach. The CIOMS scale, Naranjo scale, and WHO method were used in 10, 8, and 2 publications, respectively^[83]. Therefore, in HILI and DILI publications the CIOMS scale was the preferred specific causality assessment method if the unstructured *ad hoc* approach is excluded. Physicians are well advised to use the CIOMS scale for HILI causality evaluation, to err on the side of caution.

NIH PREFERENCE

The NIH LiverTox specifically addressed the item of

causality in hepatotoxicity cases^[2,3]. It focuses primarily on using the CIOMS scale, which is discussed in detail. Moreover, the MV and Naranjo scales, the Bayesian, and expert opinion assessment are referred to; details of the DILIN causality assessment also are presented. Some strengths and weaknesses of these methods are compiled (Tables 3 and 4).

PROSPECTIVE CAUSALITY ASSESSMENT METHODS

CIOMS scale

The method of choice for the causality assessment of suspected HILI is the CIOMS scale in its original form^[60,61] or preferably its update (Tables 5 and 6)^[62], with early starting of the evaluation at the day the physician assumes this diagnosis. The CIOMS scale is intended for prospective use at the time of manifestation; it does not require expert knowledge, is structured, quantitative, liver specific, and validated for hepatotoxicity (Table 3). Its items provide individual scores, which estimate causality levels for the agent(s) under consideration as highly probable, probable, possible, unlikely, and excluded (Tables 5 and 6). The CIOMS scale takes into account all core elements of hepatotoxicity and thereby has advantages over other algorithms (Table 4)^[62]. Compared to the regulatory used *ad hoc* approach, assessment of HILI cases with the CIOMS scale leads to lower causality grades for the incriminated herb and/or for concomitant medications and to better reproducible results due to greater transparency^[84].

CIOMS was developed by an international expert panel and validated by cases with positive reexposure tests serving as a gold standard^[60,61]. CIOMS based assessment has shown good sensitivity (86%), specificity (89%), positive predictive value (93%), and negative predictive value (78%)^[61]. The scales differ slightly for the hepatocellular and the cholestatic (\pm hepatocellular) type of injury (Tables 5 and 6)^[62]. Differentiation between these types is feasible by comparing the ratio of the serum activities of ALT and ALP at diagnosis of suspected herbal hepatotoxicity^[60,62]. Enzyme activity is expressed as a multiple of the upper limit of the normal range (N), and the ratio (R) of ALT/ALP is calculated. Liver injury is classified as: (1) hepatocellular, if ALT > 2N alone or R \geq 5; (2) cholestatic, when there is an increase of ALP > 2N alone or when R \leq 2; and (3) mixed cholestatic-hepatocellular, if ALT > 2N, ALP is increased, and R between 2 and 5.

Strengths and weaknesses of the CIOMS scale have been discussed extensively^[2,3,62,73,79,82,85-91]. This scale clearly compiles liver specific criteria for challenge, dechallenge, risk factors, exclusion of unrelated diseases, and comedication, but does not use liver histology data (Tables 5 and 6)^[60,62], agreed upon as less helpful criteria in most cases^[90,91]. It considers unintentional reexposure results according to criteria as established by previous expert consensus meetings^[92,93]. For reexposure results of the hepatocellular type of liver injury, ALT levels are as-

essed before reexposure (designed as baseline ALT or ALTb), and at reexposure (designed as ALT_r). The reexposure test is positive, if (1) ALT_b is below 5N with N as the upper limit of the normal value, and (2) ALT_r \geq 2ALT_b^[92].

The test is negative, if only one or no criterion is fulfilled; it is uninterpretable, if ALT data are lacking for one or both times. For reexposure assessments of the cholestatic (\pm hepatocellular) type of liver injury, ALT has to be replaced by ALP. Criteria for positive reexposure tests are included in the updated CIOMS scale (Tables 5 and 6) and were not previously applied in cases with reported positive reexposure tests^[40-57,59,91]. When these cases were submitted to retrospective analysis using the reexposure test criteria, a positive reexposure test could be confirmed in only 13/30 cases, the test was negative in 5/30 cases and uninterpretable in 12/30 cases^[91]. In 8 cases of initially assumed Herbalife hepatotoxicity with a previously reported positive reexposure test result, retrospective evaluation applying the test criteria revealed that criteria for a positive reexposure were fulfilled in only 1/8 cases, whereas the reexposure test was classified as negative in another case or the data were considered as uninterpretable due to missing information to comply adequately with the criteria in the remaining six cases^[94].

The CIOMS scale was widely used for hepatotoxicity assessments in epidemiological studies, clinical trials, case reports, case series, regulatory analyses, and genotyping studies^[13,14,24,25,35,36,38,39,58,59,61,64,72,79,84,86,87,90,95-98]. Proposals for refinement and strengthening of the CIOMS scale focused on the weight of individual parameters and risk factors such as alcohol and age, and other shortcomings were addressed^[24,87,89,90]. However, there is lack of valid data to verify improvements based on reassessing and reevaluating of published approaches^[87,89,90,98], calling for new approaches.

Assessment of suspected HILI cases may be problematic in spontaneous reports with insufficient data. Evaluating these cases requires a sophisticated approach, as undertaken by EMA for 31 EU cases of suspected HILI by BC, using the CIOMS scale^[34]. This series included 11/31 unassessable cases (35%) due to poor data quality, with causality assessment feasible in 20/31 cases (65%). Among these, EMA specified likely alternative causes in 8/20 cases with diagnoses such as autoimmune hepatitis, DILI, preexisting liver disease, alcoholic hepatitis, and preexisting liver cirrhosis with Stevens Johnson syndrome^[34]. Causality for BC was unlikely or excluded in another 6/20 cases and 5/20 cases, respectively. In 1/20 cases, causality was judged as possible by EMA^[34], but upon further evaluation this particular case with insufficient data quality was attributed with an excluded causality^[71]. Consequently, in this EMA study group of 31 EU cases there was little evidence of liver injury by BC based on the use of the CIOMS scale, which was most helpful in this particular analysis and provided robust results^[34]. The approach of EMA to apply the CIOMS scale in hepatotoxicity cases^[34] should be highly appreciated and is in line with the corresponding recom-

mendation by the NIH for their LiverTox database to prefer the CIOMS scale over other methods^[2,3].

At present, we are far away from valid data and strict management in suspected HILI cases, which impedes description of classic HILI by the majority of herbs. Possible or likely alternative diagnoses were evident in 278/573 cases (48.5%) of suspected HILI cases; causality assessment was impeded in 165/573 patients (29.0%) due to missing case data or lack of a temporal association, resulting in diagnostic problems in 77.5% of all cases^[82]. Given these limitations, actual discussions of validity of reported HILI cases are understandable^[82,90,91,94,98-100], and uncertainty also extends to the validity of the type of liver injury reported for some cases lacking a probable or highly probable causality. Considering these restrictions, the hepatocellular type of injury was described for Indian Ayurvedic herbs^[72,98], Chaparral (*Larrea tridentata*)^[40,98], Dai Saiko To^[47,98], Germander^[98], Green Tea extract^[98], Greater Celandine^[37], Hydroxycut^[6,98], *Jin Bu Huan* (*Lycopodium serratum*)^[45,98], Kava^[13], the cholestatic or mixed type for Chaparral^[98], Germander^[98], Green Tea extract^[98], Greater Celandine^[98], Hydroxycut^[6,98]; and the veno-occlusive disease for plants containing pyrrolizidine alkaloids such as *Senecio*, *Heliotropium*, *Crotalaria*, and *Symphytum* species^[98].

In clinical practice, the physician will start at the day HILI is suspected with the CIOMS scale to arrive at an initial estimation and to exclude the most frequent alternative causes, provided point by point in the CIOMS questionnaire (Tables 5 and 6). The practical application of the CIOMS scale was published in various case series^[13,25,35,36,38,39,71,72,94] and is shown by two single cases as examples, one for a case of hepatotoxicity by Indian Ayurvedic herbs (Table 7)^[58], and another one for a case of liver injury by a dietary supplement^[97]. For further refinement, specific information usually is necessary to rule out rare alternative causes (Table 2). This initial approach using the CIOMS scale ensures prospectively the collection of highly qualified case data and enables a sophisticated case evaluation currently and in the future. Information of individual CIOMS items (Tables 5 and 6), the checklist for HILI diagnosis (Table 2), all raw data, and a narrative case report should be presented to regulatory agencies, the scientific community, manufacturers, and expert panels to allow refined use of the CIOMS scale and all other case data, provided causality for the incriminated herb reached a probable or highly probable level.

MV scale

The MV scale^[76] was developed in an attempt to improve the CIOMS scale by adding other clinical elements and by simplifying and changing the relative weight of assessment parameters, in detail discussed by the NIH LiverTox^[2,3] and others^[62,87], or briefly referenced^[98]. As a shortened and modified version of the CIOMS scale^[60], the MV scale^[76] has fewer specific criteria than the original CIOMS scale (Table 4); due to major differences in test cases, however, the equivalency to CIOMS has been debated^[2,3,62,84,87,89,96].

Specifically, the MV scale evaluates dechallenge as

Table 7 Council for International Organizations of Medical Sciences scale as an example with items required for causality assessment in a patient with herb induced liver injury by four Indian Ayurvedic herbs

Items for hepatocellular injury	Possible score	Psoralea corylifolia	Acacia catechu	Eclipta alba	Vetivexia zizanioidis
Time to onset from the beginning of the herb					
5-90 d (rechallenge: 1-15 d)	+2				
< 5 d or > 90 d (rechallenge: > 15 d)	+1	+1	+1	+1	+1
Alternative: Time to onset from cessation of the herb					
≤ 15 d (except for slowly metabolized herbal chemicals: > 15 d)	+1				
Course of ALT after cessation of the herb					
Percentage difference between ALT peak and N					
Decrease ≥ 50% within 8 d	+3	+3	+3	+3	+3
Decrease ≥ 50% within 30 d	+2				
No information or continued herbal use	0				
Decrease ≥ 50% after the 30 th day	0				
Decrease < 50% after the 30 th day or recurrent increase	-2				
Risk factors					
Alcohol use (drinks/d: > 2 for women, > 3 for men)	+1				
No alcohol use (drinks/d: ≤ 2 for women, ≤ 3 for men)	0	0	0	0	0
Age ≥ 55 yr	+1	+1	+1	+1	+1
Age < 55 yr	0				
Concomitant herbs(s) and drug(s)					
None or no information	0				
Concomitant herb or drug with incompatible time to onset	0				
Concomitant herb or drug with compatible or suggestive time to onset	-1	-1			
Concomitant herb or drug known as hepatotoxin and with compatible or suggestive time to onset	-2		-2	-2	-2
Concomitant herb or drug with evidence for its role in this case (positive rechallenge or validated test)	-3				
Search for non herb causes					
Group I (6 causes)					
Anti-HAV-IgM		-	-	-	-
HBsAg, anti-HBc-IgM, HBV-DNA		-	-	-	-
Anti-HCV, HCV-RNA		-	-	-	-
Hepatobiliary sonography/colour Doppler sonography of liver vessels/endsonography/CT/MRC		-	-	-	-
Alcoholism (AST/ALT ≥ 2 IU/L)		-	-	-	-
Acute recent hypotension history (particularly if underlying heart disease)		-	-	-	-
Group II (6 causes)					
Complications of underlying disease(s)		-	-	-	-
Infection suggested by PCR and titre change for					
CMV (anti-CMV-IgM, anti-CMV-IgG)		-	-	-	-
EBV (anti-EBV-IgM, anti-EBV-IgG)		-	-	-	-
HEV (anti-HEV-IgM, anti-HEV-IgG)		-	-	-	-
HSV (anti-HSV-IgM, anti-HSV-IgG)		-	-	-	-
VZV (anti-VZV-IgM, anti-VZV-IgG)		-	-	-	-
Evaluation of group I and II					
All causes-groups I and II-reasonably ruled out	+2	+2	+2	+2	+2
The 6 causes of group I ruled out	+1				
5 or 4 causes of group I ruled out	0				
Less than 4 causes of group I ruled out	-2				
Non herb cause highly probable	-3				
Previous information on hepatotoxicity of the herb					
Reaction labelled in the product characteristics	+2				
Reaction published but unlabelled	+1	+1			
Reaction unknown	0		0	0	0
Response to readministration					
Doubling of ALT with the herb alone, provided ALT below 5N before reexposure	+3				
Doubling of ALT with the herb(s) and drug(s) already given at the time of first reaction	+1				
Increase of ALT but less than N in the same conditions as for the first administration	-2				
Other situations	0				
Total score for each individual herb used by the patient		+7	+5	+5	+5

The data of the patient with severe hepatotoxicity by four different Indian Ayurvedic herbs are derived from a published report^[58], using the updated Council for International Organizations of Medical Sciences scale for the hepatocellular type of liver injury (Table 5). The symbol - signifies that this particular item has been evaluated and no abnormality was found. Regarding risk factor of alcohol use, 1 drink commonly contains about 10 g ethanol^[2,3,90]. For the four herbs, the total score was either 5 (possible causality) or 7 (probable causality). ALT: Alanine aminotransferase; N: Upper limit of the normal range; HBsAg: Hepatitis B antigen; HBc: Hepatitis B core; HAV: Hepatitis A virus; IgM: Immunoglobulin M; HBV: Hepatitis B virus; HCV: Hepatitis C virus; CT: Computer tomography; MRC: Magnetic resonance cholangiography; AST: Aspartate aminotransferase; PCR: Polymerase chain reaction; CMV: Cytomegalovirus; EBV: Epstein Barr virus; HEV: Hepatitis E virus; HSV: Herpes simplex virus; VZV: Varicella zoster virus.

the time necessary for ALT or ALP to fall below 2N, considers a shorter latency period, asks for less accurate exclusion criteria of drug-independent causes, ignores concomitant drug use, emphasizes drugs with more than 5 years marketing without published hepatotoxicity, and overestimates extrahepatic manifestations like hypersensitivity reactions^[76]. The validation used real and fictive cases and as gold standard the opinion of three external experts^[76,87] and not cases with verified results of positive reexposure tests^[76]; for initial validation of the CIOMS scale, both a panel of experts and positive reexposure tests were used^[60,61]. Compared to the CIOMS scale^[60], the MV scale was equivalently accurate only in cases of hypersensitivity; otherwise, the CIOMS scale was superior to the MV scale^[89,96]. A comparison of the two scales for hepatotoxicity cases demonstrated low consistency between the two systems, with agreement between the scales in only 18% of the cases; the CIOMS scale showed better discriminative power and produced assessments closer to those of specialists^[87]. These limitations restrict the general use of the MV scale in hepatotoxicity cases^[62].

A recent HILI study confirmed poor concordance between the MV and CIOMS scales for both the herb and concomitant medication assessment. The CIOMS scale found higher causality levels for the herb and concomitant medications than the MV scale; this was associated with considerably lower causality levels provided by the MV scale compared to the *ad hoc* approach^[84]. The low MV scores were attributed to various parameters such as prolonged latency and dechallenge periods, the presence of several alternative herb independent causes for the observed liver disease, only partial exclusion of herb unrelated causes due to missing essential case data, and lacking consideration of extrahepatic manifestations like rash, fever, arthralgia, peripheral eosinophilia, and cytopenia. It therefore appeared that various confounders precluded a high level of causality for the herb in a setting of HILI cases assessed by the MV scale.

The MV scale may be useful in some selected hepatotoxicity cases. Nonetheless, little evidence is provided that this scale has advantages over the CIOMS scale and should be the preferred tool^[2,3,62,87,89,95,96]. It has been criticized by the NIH LiverTox that the elements used in the MV scale and their relative weights were based upon the authors' expert opinion and not by prospective evaluation of a variety of possible elements and different cutoff values and weights^[2,3]. Additional concern was expressed that the MV scale focuses on hypersensitivity features that are comparatively infrequent in hepatotoxicity cases; it performs poorly in atypical cases, such as unusually long latency periods or residual chronic symptoms after cessation of the culprit^[87]. Another issue raised was the low numbers of experts and the low degree of validation^[2,3] of the MV scale^[76]. Thus, the MV scale is not commonly recommended for assumed HILI cases and certainly is no substitute for the CIOMS scale^[2,3,87,98].

Naranjo scale

The NIH LiverTox summarized the arguments for and against the Naranjo scale^[2,3]. In detail, while this scale includes all general features important in assessing causality, most critical elements are not weighed in judging the likelihood of liver injury, for example specific time to onset, criteria for recovery time, and list of critical diagnoses to exclude, limiting the use of this scale for assessing hepatotoxicity. The Naranjo scale includes testing for drug levels, which is rarely helpful in idiosyncratic drug induced liver disease. Finally, the scale was designed for use in clinical trials, and points are subtracted if the reaction reappears with administration of placebo, which does not apply to the usual case of drug induced liver disease. Direct comparisons to the CIOMS scale have shown that the Naranjo scale is easier to apply, but has less sensitivity and specificity in assigning causality to cases of liver injury. These statements of the NIH LiverTox^[2,3] supported other views^[87], confirming low sensitivity, and a lower prediction rate of the Naranjo scale in a careful comparison with the CIOMS scale for suspected hepatotoxicity cases^[101]. These studies concluded that the Naranjo scale lacks validity and reproducibility when evaluating hepatotoxicity^[86,93]; it was not recommended for hepatotoxicity assessment^[87].

The Naranjo scale was designed to assess causality of any adverse drug reaction (ADR), independent from the affected organ^[77]. It substantially differs from other causality algorithms for hepatotoxicity (Tables 3 and 4)^[2,3,24-26,63,79,87,88,101]. This scale relates toxic drug reactions to general pharmacological drug actions rather than possibly to idiosyncratic reactions like rare hepatotoxicity^[77]. Its items include drug concentrations and monitoring, dose relations such as decreasing dose, placebo response, cross-reactivity, and confirmation of ADRs using unidentified objective evidence, which is relevant only for toxic reactions^[77,79,88]. The general use of the Naranjo scale in hepatotoxicity cases^[23,79] created concern^[2,3,24-26,63,70,87,88,101].

The use of the liver unspecific Naranjo scale^[77] is unacceptable in suspected HILI cases^[23,79], its results are heavily disputed^[24-26,63,70,79,88]; this pertains especially to the shortened version used by the United States Pharmacopeia (USP)^[23,79] with only 5 of the original 10 items^[88]. Lack of liver specificity associated with the Naranjo algorithm is evident by lack of a definition of liver injury as ADR; an unclear time frame and latency period; undefined time frames for dechallenge; no definition of risk factors; insufficient evaluation of alternative diagnoses; inappropriate assessment of comedication; and lacking definition of a positive rechallenge test (Table 4)^[77,88]. This scale also was considered too insensitive, allowing a possible causality even in the absence of essential data, by virtue of the patient simply having taken the suspected agent^[63,70]. Most importantly, the modified Naranjo scale as used by USP^[23,70] did not exclude relevant alternative causes such as idiopathic autoimmune hepatitis, alcoholic or cardiac hepatopathy, other preexisting liver

diseases, DILI, and drug-induced rhabdomyolysis^[24-26]. Use of this method has raised concern about judgement validity by the USP^[63,88]. Considering all shortcomings along with the lack of liver specificity and validation for hepatotoxicity, the Naranjo scale should be excluded from use in hepatotoxicity cases. It certainly is no substitute for the CIOMS scale.

KL method

The KL method^[78] is neither liver specific nor validated for hepatotoxicity (Table 3), it also lacks important items for hepatotoxicity assessment (Table 4). It was recently applied for causality assessment of suspected hepatotoxicity for some Herbalife products^[74]. Subjective judgement is needed for many steps, making this method more prone to bias^[87]. Though commonly applied by the Spanish Pharmacovigilance Centres^[74], the KL method is not used by the Spanish Group for the Study of Drug-induced Liver Disease^[59,85,87,95], which applies the CIOMS scale as the preferred assessment tool. The KL method should not be used for assessment of hepatotoxicity cases.

Ad hoc approach

Numerous published HILI reports lack any causality method description and presumably are based on the *ad hoc* assessment with its relevant shortcomings (Tables 3 and 4). When using this approach, the physician notes the coincidence of herbal product and chemical drug use, and will estimate the likelihood of a hepatotoxic reaction^[89].

After ruling out alternative causes, the *ad hoc* approach is often used to distinguish a probable, possible, or unlikely causality^[89]. A probable causality is usually attributed when the manifestations of liver disease, temporal association, and dechallenge response seems to fit the typical signature pattern of the product in question. A possible attribution is assigned when one feature is not typical, the product not known to cause the reaction or so rarely that it is difficult to distinguish from background, or an alternative cause is less or equally plausible. An unlikely causality is assigned when most of the features are atypical or an alternative cause is more plausible^[89].

Though relevant items such as signature of symptoms, latency period, dechallenge, definitive exclusion of alternative causes, risk factors, alcohol use, and track record of the product are used^[79,89], no universally accepted description exists for either the method or its application^[79]. Due to missing specific criteria (Tables 3 and 4), the *ad hoc* approach is obsolete to validly assess causality in HILI^[79] or DILI cases^[89].

With the *ad hoc* assessment applied prior to the liver specific CIOMS scale, the physician inevitably will postpone an assessment by such a procedure and thereby delay the diagnosis. Since the parameters of the *ad hoc* approach are liver unspecific and not validated (Tables 3 and 4), this method should be replaced by better alterna-

tives. The NIH LiverTox does not even mention the *ad hoc* approach as a possible causality evaluation method for hepatotoxicity cases^[2,3].

RETROSPECTIVE CAUSALITY ASSESSMENT METHODS

DILIN method

According to the NIH LiverTox, the DILIN method is based on a narrative summary and a compilation of clinical findings and sequential biochemical abnormalities^[2,3]. These are extracted from clinical records and entered into a 65-page case report form, but a scoring system was lacking^[102], as opposed to the CIOMS scale (Table 4). The DILIN causality adjunction process is outlined in a 12 step flow diagram, using three independently assessing experts in hepatotoxicity who grade the likelihood of a causal relationship between the drug and liver injury in one of five scores^[102]: (1) Definite (> 95% assurance): the evidence for the drug causing the injury is beyond a reasonable doubt; (2) Highly likely (75% to 95% assurance): the evidence for the drug causing the injury is clear and convincing but not definite; (3) Probable (50% to 74% assurance): the preponderance of the evidence supports the link between the drug and the liver injury; (4) Possible (25% to 49% assurance): the evidence for the drug causing the injury is equivocal but present; and (5) Unlikely (< 25% assurance): there is evidence that an etiological factor other than the drug caused the injury.

While these causality grades appear vague, attempts are made to provide an objective and critical evaluation of the likelihood that the liver injury is due to the suspected agent^[2,3]. In particular, cases are not considered “probable” merely because there is no other explanation. Similarly, cases are not considered “definite” if another diagnosis is possible. If two or three drugs are implicated, only one can be considered probable, highly likely or definite, the others are assigned “possible” or “unlikely”, so that the total percent assurance does not exceed 100%^[2,3]. The causality assessment is accepted as initially scored if the three expert reviewers completely agree; if there is disagreement, the reviewers meet to reconcile the differences and reach a final single score^[2,3,102]. A complete summary of the definitions for each category is provided^[102].

The DILIN method requires experts and has shortcomings (Tables 3 and 4)^[2,3,73,80,86,102]; it is therefore not suitable for the physician who needs assessment results during the early disease. The DILIN method was used for retrospective assessments of case series where time to conclusion is not a crucial issue^[73,86,102]. In combination with the CIOMS scale, this method is the basis for future DILIN group studies of clinical, genetic, environmental, and immunological risk factors^[80]. To exclude alternative causes in retrospective analyses by the DILIN method, screening was required for previous liver disease, alcohol use, hepatitis A, B, or C infection, autoantibodies, ceruloplasmin, α_1 -antitrypsin, ferritin, iron, and

imaging data; specific details or appropriate scores for each item were not provided (Table 4)^[102]. Other possible causes were not considered (Table 2), including specific liver infections like hepatitis E or by cytomegalovirus (CMV), Epstein Barr virus (EBV), herpes simplex virus (HSV), and varicella zoster virus (VZV)^[102]. At present, questions regarding the actual DILIN method validity remain, and transparent results of all diagnostic items from each individual patient would be preferred rather than a summarizing causality grade.

Another approach of the DILIN group targets a novel Causality Assessment Tool (CAT) specifically for HDS^[103]. CAT was designed to retrospectively adjudicate multiple products as a single entity using structured causality assessment and expert opinion. The elements of the CAT considered the multiplicity of products consumed, implicated drugs, alternative diagnoses, and published DILI literature on the product or an ingredient^[103]. In analogy to the scoring system, the DILIN method expresses causality levels as percentage assurance^[102]; CAT also grades the likelihood of a causal relationship between HDS and liver injury from definitive to unlikely^[103]. In this preliminary study, CAT was applied in 16 DILI cases, which were initially evaluated by the DILIN method and in which HDS are implicated as a potential cause. Overall agreement and reliability in this study of retrospective analysis requiring an expert panel was moderate^[103]; this method needs further investigation and validation^[98].

WHO method

In its recent statement, the NIH LiverTox does not mention the WHO method in connection with causality assessment methods for hepatotoxicity cases but rather discusses other methods^[2,3]. Since the WHO method^[81] was not developed for hepatotoxicity cases and therefore does not consider hepatotoxicity characteristics^[79,104], this omission appears warranted. The shortcomings of the unspecific features of the WHO method (Tables 3 and 4) have been a matter of major concern^[38,39,104-106] and led to the conclusion that this scale is not appropriate for causality assessment in suspected HILI cases^[79,104].

The WHO method consists of two parts, one being the WHO scale to assess causality levels, the other one the global introspection by experts^[81]. Though not validated for any ADR^[103], global introspection surprisingly represented a popular strategy in evaluating the likelihood of drug causality for general ADRs of all organs^[107]. As early as 1986, however, global introspection by experts has been shown to be neither reproducible nor valid^[107]. In detail, the assessor considers factors that might support a causal link of one or more drugs to an observed ADR, lists all factors, weighs their importance, and estimates the probability of drug causation; no specific checklist or level of strength is given^[107]. It has been recognized that both the questions and the answers are ambiguous^[79]. Though these shortcomings are described for general ADRs, they certainly also apply even more to hepatic ADRs.

The WHO scale has not been based on a gold standard, is not quantitative, not liver specific, and has not been validated for hepatotoxicity (Tables 3 and 4)^[4,38,39,79,104-106]. In particular, reliability, sensitivity, specificity, positive and negative predictive values are unknown, but likely are low^[79,81,104-106]. Its scope is also limited since it cannot discriminate between a positive and a negative correlation, thereby resulting in overdiagnosing and overreporting^[104].

The WHO method ignores relevant data like uncertainties in daily dose, temporal association, start, duration and end of herbal use, time to onset of ADR, and course of liver values after herbal discontinuation. Insufficiently considered or ignored are comedication, preexisting liver diseases, numerous alternative explanations, and exclusion of virus infections by hepatitis A, B, C and E, CMV, EBV, HSV, and VZV^[38,39]. Since only a few raw data are evaluated, case duplications and retracted cases remain undetected by the WHO method to a higher degree than by other methods^[38]. Despite these flaws, the WHO method was used for causality assessment^[17,38,39,53,54]. Re-evaluation often could not confirm causality in cases of two assessed reports^[38,39]; therefore, the use of the WHO method in HILI cases has major limitations.

Causality assessment by the WHO method requires a panel of experts rarely available at a hospital or a family physician office. Consequently, analyses based on this method are retrospective; their results are available long after the patient problems of assumed HILI.

Expert opinion

Expert opinion as an assessment tool is poorly defined (Tables 3 and 4), except that a panel of specialists with clinical expertise in hepatology is available for causality assessment in HILI. For DILI, groups of skilled hepatologists exists without any doubt in most countries including Japan^[108,109] and in expert projects like the international DILI Expert Working Group^[90], the United States DILIN group^[73,80,86,102,103], the Spanish Group for the Study of Drug-Induced Liver Disease^[59,85,87,95,101], and the Spanish-Latin American network on drug induced liver injury^[110]. For HILI, the Hong Kong Herb-Induced Liver Injury Network is of importance^[75]. However, the qualification of assessors is sometimes crucial and may be problematic as discussed in detail^[88,105,106]. Even with specialists, individual opinion often results in judgement bias.

RELEVANCE TO ACTUAL MEDICAL PRACTICE

For HILI case assessment, strategies need to be developed that are clinically useful and applicable in daily practice. These must meet the expectations of the scientific community, regulatory agencies, and manufacturers, provided the case is going to be reported. At the day when HILI is suspected and criteria of hepatotoxicity are fulfilled, the physician should explore through the internet and regulatory databases how frequently the suspected herb has been associated with hepatotoxic

adverse reactions both in the scientific literature and by regulatory notifications. Publication as an interesting case report should be encouraged, if there are few or even none hepatotoxicity reports of this particular herb. Consequently, the decision will depend on the physician's own interest and clinical experience, resulting in three different levels of assessment intensity. These include first a wait and see approach after cessation of the herbal product, second a strategy aimed at exclusion of the most frequent differential diagnoses, or third an exclusion of even rare alternative causes.

The first approach of wait and see requires little attention and few elements and is cost effective, at least initially but not necessarily in the further course. If for some reasons the correct diagnosis was missed, it will be costly and risky for the patient, the physician, or both. Submitting such an insufficiently documented case as suspected HILI case to scientific journals, regulatory agencies or manufacturers would be difficult to reconcile, leading to overreporting due to overdiagnosing^[68,82,88,104,105,111]. In detail, diagnostic problems including alternative diagnoses as confounding variables were evident in 77.5% of 573 cases of initially suspected HILI, presented as spontaneous reports or as published case reports^[82].

For the second strategy, the elements of the updated CIOMS scale are sufficient, starting with the evaluation of time to onset to verify at least a temporal association between the herbal use and the liver disease (Tables 5 and 6). For instance, if clinical assessment, hepatobiliary sonography, or serology of hepatitis A-C provides an alternative cause as the correct and final diagnosis, the costs will remain low since further diagnostic measures are not warranted. If diagnostic exclusion is unsuccessful so far, parameters of CMV, EBV, HEV, HSV, and VZV are needed (Tables 5 and 6), though in reality these elements are rarely reported in suspected HILI cases^[13,14,17,23-26,38,39,94]. With complete or even some missing CIOMS elements, the CIOMS scale provided causality for various herbs with levels of probable and highly probable^[35-37].

For the third level of evaluation, the physician will have to decide, which of the multiple other and rare differential diagnoses are worth of consideration. The checklist should be valued as a reminder of possible alternatives and as a suggestion for further approaches, depending on the clinical phenotype. Clearly, the number of criteria set for ruling out alternative causes is not required for all cases, the checklist therefore asks selectively whether the information was completely, partially or not obtained (Table 2). A sophisticated strategy is needed, however, if the case is reported to regulatory agencies and the scientific community, which are overflooded by poorly documented suspected and often misdiagnosed HILI cases^[26,34-36,38,39,82]. For optimum case presentation, the individual items of the updated CIOMS scale should be provided for a single case (Table 7)^[58,97] as well as for case series. This is feasible as shown in numerous

publications^[13,25,35,36,38,39,71,72,94] for 26 cases^[13], 22 cases^[25], 22 cases^[35], 21 cases^[36], 15 cases^[38], 13 cases^[39], and 4-9 cases^[71,72,94]. The presentation of the CIOMS items for the single case should be combined with a detailed report of all relevant case data^[58,97] and a list of differential diagnoses that were excluded completely or partially, or were not considered^[58], similar to the checklist for HILI diagnosis (Table 2). For a case series, basis data for each individual case are to be provided in a single table, focusing on details required for causality assessment; examples are presented in various publications^[14,25,35,36,38,39]. Presentation of excellent data will lead to valid causality results and appropriate conclusions. This is prerequisite for well founded assessments of further HILI cases, with benefit for patients, physicians, the scientific community, regulatory agencies, and manufacturers.

FUTURE PERSPECTIVES

Future considerations will have to focus on improvements of causality assessment methods^[90,98] to obtain prospectively valid HILI diagnoses at the time the patient experiences liver injury, corresponding efforts of retrospective causality assessments of HILI cases are promising and on the way with preliminary data^[103]. Strategies are to be developed to characterize liver injury by various herbs with all facets. At the day HILI is suspected, causality assessment should be initiated in all cases using the CIOMS scale preferentially in its updated form (Tables 5 and 6). Supported by the checklist for HILI diagnosis (Table 2), this could provide HILI cases with a probable or highly probable causality for a special herb as basis for further evaluation. Overall, this will facilitate characterization of disease entities including phenotype standardization, retrospective reanalysis by expert panels, improvement of pharmacovigilance decisions, safety strategies of manufacturers, and studies directed to assess pathogenetic aspects of HILI.

Studies are needed in the future to assess factors leading to unpredictable HILI in few patients, who experience this disease with a probable or highly probable causality level. As for DILI, future issues for HILI cases with established causality are to define genetic, environmental, and immunological determinants of HILI susceptibility^[80,90,112,113]. Overall, metabolomics, pharmacogenetics, proteomics, and transcriptomics are areas of potential interest in HILI, as detailed for DILI^[112]. Since HILI is commonly an unpredictable disease^[91], experimental studies dealing with predictive cellular systems as used to identify potentially hepatotoxic synthetic drugs^[114] will be of limited if any relevance for herbs. Similarly, applying well-defined primary cultures of human hepatocytes and measuring a panel of signals directly linked to key mechanisms of liver injury to predict drugs, which can cause liver injury^[114], will be restricted to drugs and not be applicable to herbs. Recent advances of the early pre-clinical assessment of the potential intrinsic hepatotoxicity of candidate drugs has been reviewed

in detail, focusing on cell-based models such as cell cultures with outcome and detection methods, on profiling technologies, and emerging technologies including stem cell technologies and 3D as compared to 2D culturing techniques^[115]. However, it is unlikely that the results of these *in vitro* studies of intrinsic and predictable hepatotoxicity induced by synthetic drugs are transferable to a clinical setting of HILI that commonly represents the idiosyncratic and unpredictable form of liver injury by one or more herbs, each with multiple chemical constituents. More important seems the search for biomarkers in HILI patients with clearly established causality^[116].

CONCLUSION

The rare liver injury by herbs, herbal drugs, and herbal supplements may present itself with numerous facets, providing challenging issues for causality assessment. The physician is responsible to make available all necessary data for a high quality judgement; otherwise, causality evaluation will be problematic. Timely causality assessment is mandatory when the disease is unfolding to base prospective diagnostic and therapeutic decisions. The most appropriate causality assessment method is the liver specific CIOMS scale, which should prospectively be applied by the physician. If used, other methods have pitfalls and cause ambiguous results debated on reasons of imprecision, liver unspecificity, and limitations to retrospective analyses, or they are unavailable due to requirements for expert panels.

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