

# Evaluation of the Genotoxic Potential of a Flavored Oral Nicotine Pouch Product Using Integrated Approaches

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## **Toxicity Assessment of A Flavored Oral NP Product**

Can the data from individual ingredients inform the toxicological profile of the whole product?

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  - In Vitro-In Vivo Bridging with Dosimetry
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## **Conclusions**



# Toxicity Assessment of Oral Nicotine Pouch Products

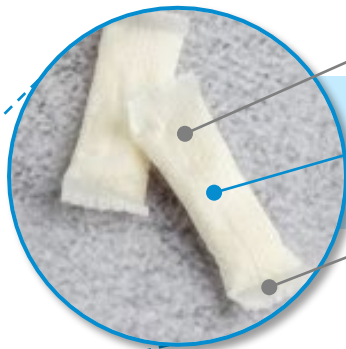
**Oral nicotine pouch (NP) products may be a viable reduced risk alternative for adult smokers who are unable or unwilling to quit all tobacco**

These products typically consist of tobacco-derived nicotine, flavors and other excipients

Oral Nicotine Pouches



Image courtesy of iStock.com/Oleksandr Shatyrov



Nicotine

Flavors

Pouch

Flavoring compounds, mostly generally recognized as safe (GRAS), have been thoroughly evaluated for their safety under conditions of the intended use (e.g., food and beverages)



Image adapted from [Food Business News](#)

Although the GRAS status of flavoring compounds are **NOT intended for the tobacco products**, the toxicological data are relevant, especially for oral products

GRAS Reference: [Generally Recognized as Safe \(GRAS\) | FDA](#)

FEMA. (2018) Safety Assessment and Regulatory Authority to Use Flavors – Focus on Electronic Nicotine Delivery Systems and Flavored Tobacco

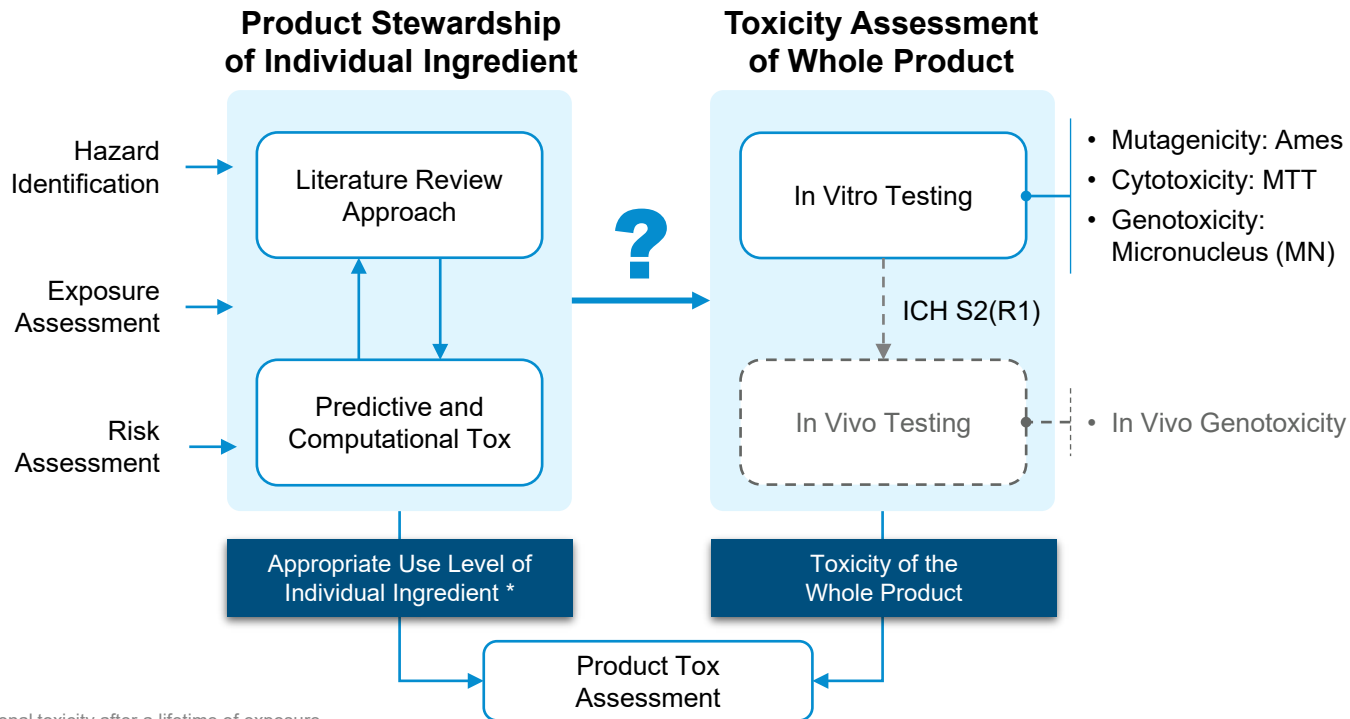


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# Concept: Toxicity Assessment of Oral Nicotine Pouch Products

Can the data from individual ingredients inform the toxicological profile of the whole product?



\*a level of exposure that does not introduce additional toxicity after a lifetime of exposure

ICH=International Council for Harmonisation

CH (2012). S2(R1) Genotoxicity Testing and Data Interpretation for Pharmaceuticals Intended for Human Use



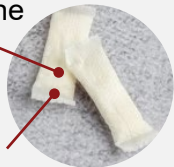
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# Case Study: Ingredient Assessment of a Prototype Flavored NP Product

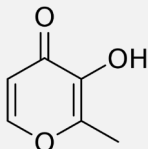
## Ingredient Assessment: Are there any potential toxicological concerns?

Nicotine

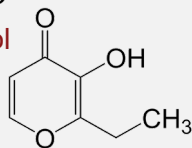


Flavors

• Maltol



• Ethyl Maltol



• Others (proprietary & no concern)

### Key Takeaways from Literature: for both maltol and ethyl maltol (“maltols”)

- In Vitro
  - Mammalian in vitro assay: Possibly **POSITIVE**
  - Ames: Possibly **POSITIVE**
- In Vivo
  - **NEGATIVE**

#### Ingredient Assessment: Maltol and Ethyl Maltol

<b>In vitro genotoxicity</b>	<ul style="list-style-type: none"><li>• Mixed (equivocal) in mammalian in-vitro studies</li><li>• With some positive responses observed in Ames assay</li></ul>
<b>In vivo genotoxicity</b>	<ul style="list-style-type: none"><li>• Considered non-genotoxic by JECFA, EFSA, and ECHA (Negative in vivo MN-comet assay)</li><li>• Negative in vivo MN and comet assay via oral route (EFSA, 2015)</li></ul>
<b>Carcinogenicity</b>	<ul style="list-style-type: none"><li>• Not Carcinogenic via oral route<ul style="list-style-type: none"><li>– Maltol: in-silico prediction</li><li>– Ethyl Maltol: chronic toxicity study (Gralla et al. 1969); in-silico prediction</li></ul></li></ul>

Adapted from: Molly et al. (2024) Hazard Identification and Risk Assessment of Non-Nicotine Ingredients in Oral Nicotine Pouches. SOT 2024. Salt Lake City.  
EFSA. (2015) [Scientific Opinion on Flavouring Group Evaluation 213, Revision 2 \(FGE.213Rev2\): Consideration of genotoxic potential for  \$\alpha,\beta\$ -unsaturated alicyclic ketones and precursors from chemical subgroup 2.7 of FGE.19](#) Gralla et al. (1969) Toxicity studies with ethyl maltol. Toxicol. Appl Pharmacol. 15(3): 604



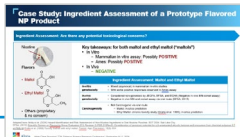
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# Case Study: In Vitro Assessment of a Prototype Flavored NP Product

## Ingredient Assessment: Are there any potential toxicological concerns?

- YES, maltol and ethyl maltol (“maltols”)
- **Maltols could lead to POSITIVE in vitro** genotoxic response
- However, maltols are **NEGATIVE** in vivo via oral route



## In Vitro: Would the whole Test NP lead to **POSITIVE** in vitro response?

### Key takeaways:

- The Test NP was tested **POSITIVE** in vitro in MN assay.
- Maltols drive the in vitro response of Test NP

### In Vitro Genotoxicity of Whole Test NP

Ames Mutagenicity **NEGATIVE**

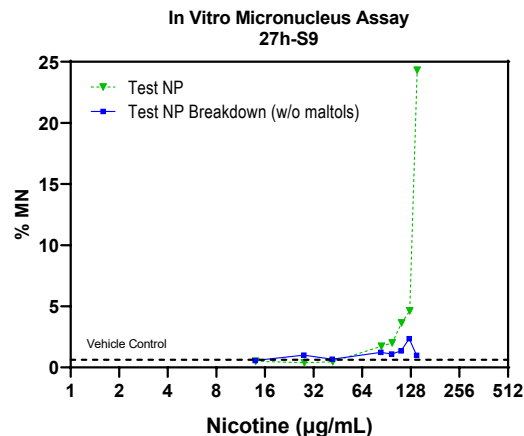
MN Genotoxicity **POSITIVE**



Extract in enzyme-free  
artificial saliva, 10% w/v



Mammalian Cells  
OR Bacteria



Adapted from: Farcas et al. (2024). Comparative toxicity assessment of oral nicotine pouches to combustible cigarettes, smokeless tobacco products, and market nicotine pouches, using regulatory in vitro cytotoxicity, mutagenicity, and genotoxicity assays. SOT 2024. Salt Lake City.



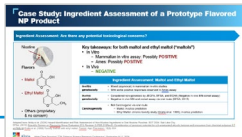
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# Case Study: In Vivo Assessment of a Prototype Flavored NP Product

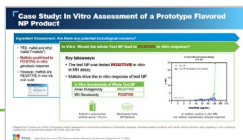
## Ingredient Assessment: Are there any potential toxicological concerns?

- YES, maltol and ethyl maltol (“maltols”)
- Maltols could lead to POSITIVE in vitro genotoxic response
- **However, maltols are NEGATIVE in vivo via oral route**



## In Vitro: Would the whole Test NP lead to POSITIVE in vitro response?

- YES
- The Test NP was tested POSITIVE in vitro in Ames and MN
- Maltols drive the in vitro response



ICH S2 (R1)



Sprague-Dawley Rats, Oral Gavage



Extract in enzyme-free artificial saliva, 10% w/v

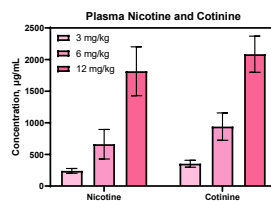
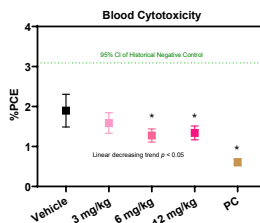
## In Vivo: Would the whole Test NP lead to NEGATIVE in vivo response?

### Key takeaways:

- W/ maltols: NOT genotoxic

### In Vivo Genotoxicity of Whole Test NP

MN (Blood, Bone Marrow)	NEGATIVE
Comet (Liver, Stomach)	NEGATIVE



So far, the ingredient assessment has successfully informed the in vitro and in vivo toxicity of the whole product

Adapted from: Zhang et al. (2024). Evaluation of the in vivo genotoxic potential of an oral nicotine pouch product following ICH S2(R1) guidance. SOT 2024. Salt Lake City. Image of the rat adapted from [Impact of oral gavage technique of drug-containing microcontainers on the gastrointestinal transit and absorption in rats](#)



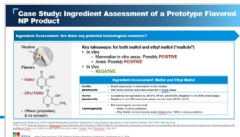
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# Case Study: Bridging the In Vitro and In Vivo Outcomes

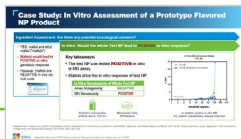
## Ingredient Assessment: Are there any potential toxicological concerns?

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- Maltols could lead to **POSITIVE in vitro** genotoxic response
- However, maltols are **NEGATIVE in vivo** via oral route



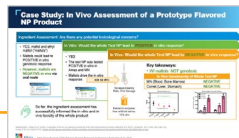
## In Vitro: Would the whole Test NP lead to **POSITIVE** in vitro response?

- YES
- The Test NP was tested **POSITIVE in vitro** in Ames and MN
- Maltols drive the in vitro response



## In Vivo: Would the whole Test NP lead to **NEGATIVE** in vivo response?

- YES
- The Test NP was tested **NEGATIVE in vivo** in MN and comet assay



## Bridging the In Vitro and In Vivo Outcomes

Positive In Vitro

Negative In Vivo

- Fast absorption in the gastrointestinal tract and efficient metabolism in the liver in rats and humans
- Different routes of administration lead to different in vivo MN results (EFSA, 2015)
  - Intraperitoneal injection → Positive
  - Oral gavage → Negative

**Dosimetry plays a role in the in vivo genotoxicity of the maltols**

EFSA (2015). Scientific Opinion on Flavouring Group Evaluation 213, Revision 2 (FGE.213Rev2): Consideration of genotoxic potential for  $\alpha,\beta$ -unsaturated alicyclic ketones and precursors from chemical subgroup 2.7 of FGE.19



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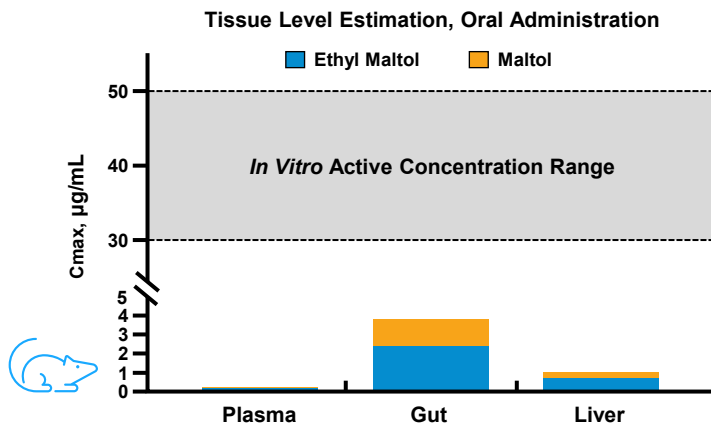


# Case Study: A Dosimetry Hypothesis to Bridge the In Vitro-In Vivo MN Assay

## Dosimetry hypothesis:

- In vivo tissue concentrations of the maltols are substantially lower (negative in vivo outcomes) than the active in vitro concentration (positive in vitro outcomes)

**In Vivo Tissue Levels << In Vitro Bioactive Concentration**



## Open-source pharmacokinetic model (Oral): EPA htk<sup>1</sup>

- Oral; dose once every 24 hours for 4 days

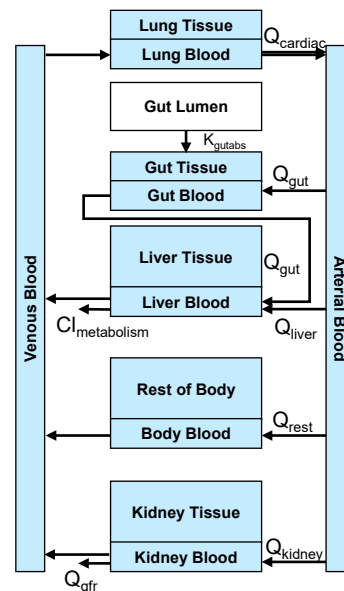


Diagram of the PBTK model in the htk R package<sup>2</sup>

1. ICE Tools (nih.gov); 2. Pearce et al. (2017) [htk: R Package for High-Throughput Toxicokinetics](https://doi.org/10.1093/bioinformatics/btx100)

# Conclusions



**We conducted a feasibility study and evaluated a flavored oral nicotine pouch product integrating New Approach Methodologies (NAMs) into standard non-clinical test battery**

With this specific case example, we demonstrated that

- **Data from individual ingredients (literature and in silico) could inform the in vitro and in vivo toxicological profile of the whole product**, as confirmed by experimental results
- AND,
- **Dosimetry provides insight into the biological relevance of in vitro testing**, which are often sensitive due to lack of complete metabolism or tested in a wide concentration range for hazard identification purposes
- **Caveat:** a simple mixture that allows us to identify the toxicity driver

**We built a case for NAMs-based toxicological assessment without the need for confirmatory in vivo testing**

**New area in new era: Integration of Exposure/Dosimetry and Mechanisms**

**AEP – AOP: Aggregated Exposure Pathway – Adverse Outcome Pathway**



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# Acknowledgement



**If you have any questions, please contact:**

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Thanks  
**Any Questions?**



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