





## Food Ingredient Safety

- US Food and Drug Administration (FDA) oversees food ingredient safety
- Overview: "FDA's Food Ingredient Approval Process, Safety Assurance Based on Scientific Assessment"
  - Regulatory Toxicology and Pharmacology, 2008
  - http://www.caloriecontrol.org/pdf/Rulis\_08.pdf



## Food Ingredient Safety

- "Food Additive" becomes a component or affects characteristic of a food and <u>is</u> <u>not</u> Generally Recognized As Safe (GRAS)
- New food additive is unsafe until proven safe and burden of proof of safety lies with petitioner



# Food Ingredient Safety

- · Safety review includes:
  - Intake
  - Cumulative effect of all uses
  - Toxicology data to support safety
  - Must meet law's safety standard of "reasonable certainty of no harm."







# Food Ingredient Safety

- Unlike drugs, review does not look at benefits
- Must have low toxic potential
- Must be safe for everyone (pregnant women, children, etc.)







### **GRAS**

- · Generally Recognized As Safe
- There is general consensus by qualified experts that the ingredient is safe for its intended use
- Same safety standard as food ingredients
   "reasonable certainty of no harm"







# GRAS vs. Food Ingredient

- Information/Common knowledge regarding safety
- General availability and general acceptance of information; widely known
- Clearly outlined in 1997 Federal Register
- Both require same strength of evidence







## **GRAS**

- FDA does not "approve" a GRAS notice
- Issues letter: "no questions at this time about the conclusions...."
- GRAS claimant must fully address any potential controversy







Historical Use of Stevia, Mapping the Road to GRAS and Overcoming Obstacles

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# U.S. Regulatory History

- Stevia sold in herbal and health food stores; unregulated in the 1970s and 80s
- GRAS Affirmation petition (2G0390) submitted to FDA on behalf of American Herbal Products Association: basis cited as pre-1958 history of use. Approval denied; safety concerns cited
- Stevia permitted for use as a dietary supplement under Dietary Supplement Health & Education Act of 1994 (DSHEA); safety concerns prohibited use as a food ingredient







# Consideration by the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

- JECFA reviewed steviol glycosides at its 58<sup>th</sup>, 63<sup>rd</sup>, 68<sup>th</sup>, 69<sup>th</sup> meetings
- At the 58<sup>th</sup> and 63<sup>rd</sup> meetings, temporary specifications and a temporary acceptable daily intake (ADI) were assigned; safety concerns cited
- At the 68<sup>th</sup> meeting, final specifications were put in place and the temporary ADI was extended
- At the 69<sup>th</sup> meeting (2009), a final ADI of 0-4 mg/kg bw expressed as steviol, was established







# Steviol Glycosides

- Information needed to assure safety and secure regulatory approval:
  - Food-grade specifications
  - Estimated daily intake
  - Acceptable daily intake
    - Absorption, distribution, metabolism and excretion (ADME)
    - Systemic toxicity
    - · Physiologic/pharmacologic activity







# Composition of Stevia Leaf

- · Structural compounds
  - Fiber, cellulose, membrane lipids, waxes
- Primary metabolites (needed for nutrition and essential metabolic processes)
  - Chlorophylls, phytosterols, organic acids
- Secondary metabolites (not necessary for nutrition and growth, but may confer an ecological advantage; includes steviol glycosides)







# Specification Problem:

Not all Stevia extracts are created equal

- · Aqueous solutions vs. dried extracts
- · Purity of material
- Proportion of the different steviol glycosides
  - Historically extracts high in stevioside
  - Newer extracts are higher in rebaudioside A
    - Taste







# Basis for the Specifications and Subsequent Safety Evaluation

· Based on steviol equivalents

How much steviol are we consuming?

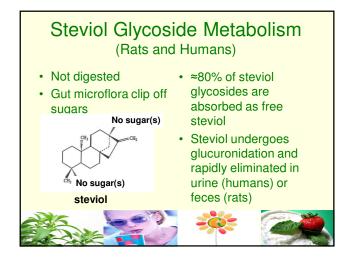
(not how much of any one steviol glycoside)

• 1 g steviol glycoside = 0.3 - 0.4 g steviol









## Basis for Regulatory Acceptance

- The basis for generation of appropriate specifications for steviol glycosides and subsequent safety evaluation is derived from:
  - comparative metabolism (rat studies are a good model) and;
  - metabolic disposition studies in rodents and humans (steviol is the common metabolite for steviol glycosides)







# Basis for Regulatory Acceptance Specifications

JECFA allows for seven steviol glycosides (rebaudioside A, stevioside, rebaudioside B, steviolbioside, rebaudioside C, dulcoside A and rubusoside) to be present, the sum of which accounts for a minimum of 95% of the dried substance (JECFA 2007)







# Basis for Regulatory Acceptance Toxicology

 Steviol glycosides have very low acute toxicity in animals and there is no evidence of health risk, including repeat dose systemic toxicity, carcinogenicity, developmental, or reproductive effects.
 Weight of the evidence indicates that steviol glycosides are not genotoxic.







# Basis for Regulatory Acceptance

 Safety of ingestion of steviol glycosides in humans has been corroborated in clinical trials; measures of tolerance, body weight, clinical chemistry, hematology and urinalysis did not show any evidence of untoward effects; no untoward effects on blood pressure or glucose control.







# Basis for Regulatory Acceptance

 Estimates of intake for steviol glycosides, when used as a sweetener, were determined to be within established safe levels







### **GRAS Notifications**

GRAS Notices (filed in 2008-2009) for use of steviol glycoside extracts as a sweetener in food products:

GRN 252, 253, 275, 278, 282, 287, 303, 304

Notices highlighted in red have no questions or letters; others pending







Safety Studies Supporting GRAS and International Regulatory
Requirements

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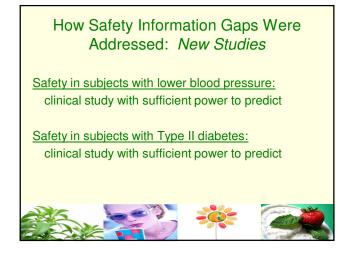












Safety Summary – Existing Studies		
Study	Summary	
Pre-clinical Safety	Pre-2008 90-day studies on stevioside, but not reb-A. Some reported adverse renal effects not observed in later studies.  Mid-2008 publication of a 90-day study reported a 2000 mg/kg/day no observed adverse effect level (NOAEL) and no adverse effects with reb-A.	
	Previously published reproductive safety studies – adverse effects reported with unrefined or uncharacterized stevia	
Genetic Toxicity and Cancer	Previous genotoxicity concerns about steviol – expert review concluded these were in-vitro test specific artifacts.  Previous 2-year carcinogenicity study on stevioside had NOAEL of approx. 1000 mg/kg/day (400 mg/kg/day steviol equiv.)	

Study	Summary
Microbial effects	Review of literature indicated no potential for adverse effects on normal intestinal microflora.
Clinical studies on blood pressure	A number of previous small studies and anecdotal reports touting stevia as an herbal treatment for high blood pressure and glucose control in diabetics.
and glucose effects	2007 e-publication of combined clinical study that looked at blood pressure and glucose homeostasis in same subjects. No pharmacological effects observed but considered too small to provide acceptable predictive by regulatory authorities at that time. Subsequently, used successfully in at least one GRAS notification without other supporting documentation of clinical safety.

Study	Summary
Intake Assessment	Estimated intake based on actual NNS intake studies was accepted by both FDA and JECFA. High-consuming (95 <sup>th</sup> percentile) adult intake 3.4 mg/kg/day; high consuming children 5.0 mg/kg/day; and 4.5 mg/kg/day for children with diabetes.  5 mg/kg/day reb-A = 1.6 mg/kg/day in steviol equivalents
Metabolism	Human and rodent metabolism are similar – all steviol alycosides are metabolized to steviol.
	Some differences in primary route of excretion:  • rat primarily via feces as steviol
	<ul> <li>human primarily via urine as soluble steviol glucuronide</li> </ul>

Study	Summary
General safety / renal and hepatic safety	Very high doses tested in 28-day pre-clinical study (up to 10% of diet) with no adverse effects observed.  In 90-day pre-clinical study (doses up to 5% of diet), no adverse effects observed.
	NOAEL approx. 4000 mg reb-A/kg/day
Reproductive Safety	No effects on male reproductive system at very high doses used for 28- and 90-day preclinical studies.
	No functional or structural effects observed in 2- generation reproductive safety study. No effects on off spring.
	NOAEL approx. 2500 mg reb-A/kg/day
Microbial effects	Review of literature indicated no potential for adverse effects on normal intestinal microflora.

Safety Summary		
Study	Summary	
Blood Pressure	4-week clinical study on human subjects with low to low-normal blood pressure. No effects observed  (80% power to detect a 4.5 mmHg change in resting seated systolic bp).	
Diabetes	16-week clinical study in subjects with type II diabetes – no effects on multiple measures of glucose homeostasis including HbA1c (90% power to detect a 0.5% change in HbA1c from baseline to end of study).	

### Safety Summary

- On a steviol-equivalent basis, pre-clinical safety studies support a NOAEL of 400 mg steviol/kg/day based on the results of the carcinogenicity study with supporting safety data from the other pre-clinical studies at higher NOAELs.
- A 100-fold safety factor provides an ADI of 0-4 mg steviol/kg/day equivalent to 12 mg reb-A/kg/day.
- The intake assessment showed that high-percentile consumers would be expected to ingest no more than 5 mg reb-A/kg/day.







## Safety Summary

- No adverse effects in special populations:
  - subjects with low blood pressure
  - subjects with Type-2 diabetes
- Important for GRAS:

All studies published in peer reviewed journal to establish "general recognition"









# Stevia: Tabletop Sweeteners

- · Uses:
  - Sweeten foods & beverages
  - Cooking and baking
- · Forms of stevia:
  - Rebaudioside A, abbreviated as Reb A or Rebiana;
- Stevia extract: numerous steviol glycosides, mainly rebaudioside A
- Bulking ingredients:
  - Used with stevia form to provide volume/bulk
    - similar to all NCS, used due to sweetness intensity
  - Used to obtain optimal taste profile
  - Different bulking ingredients used in products







# Pure Via All Natural Zero Calorie Sweetener • Manufacturer: Whole Earth Sweetener Company • Website: purevia.com • Stevia form: Rebaudioside A (abbrev. Reb A) • Product form: Sticks, 1 = 2 tsp sweetness • Ingredients\*: Erythritol, isomaltulose, Reb A (Stevia extract), Contains 1% or less of Cellulose Powder and each Natural Flavor • Nutrition Facts (svg): Cal: 0^, CHO: 2g, Sugars: <1g, Erythritol: 1 g \*Order listed on package \*FDA - less than 5 cals/svg can be listed as 0

# Stevia in the Raw 100% Natural Zero Calorie Sweetener Manufacturer: Cumberland Packing Corp. Website: steviaextractintheraw.com Stevia form: Rebiana Product form: Packets, 1 = 2 tsp sweetness Granulated = cup for cup Ingredients\*: Packets - Dextrose, Stevia extract (rebiana) Granulated = maltodextrin, Stevia extract Nutrition Facts (svg): Cal: 0, CHO: <1g, Sugars: <1g

# Sun Crystals all-natural sweetener Manufacturer: McNeil Nutritionals, LLC Website: suncrystals.com Stevia form: stevia extract Product form(s): Packets, 1 = 2 tsp sweetness, Granulated blend: ½ cup = 1 cup sweetness Ingredients\*: packet and granulated: cane sugar, stevia Nutrition Facts (svg): Pkt: Cal: 5, CHO: 1g, Sugars: 1g Granulated (1/2 tsp): Cal: 5, CHO: 2g, Sugars: 2g 'Order listed on package

# Sweet Leaf All Natural Stevia Plus Manufacturer: Wisdom Natural Brands Website: sweetleaf.com Stevia form: Stevia extract Product form(s): Packets 1 = 2 tsp sweetness; Shaker jar (shake to taste); Tablets 1 = 1 tsp sugar (pure stevia) Ingredients\*: inulin, stevia extract (inulin: polysaccharide found in fruits, veg; blend of fructose polymers synthesized from sucrose or extracted from chicory root [sweet leaf]) Nutrition Facts: Cal: 0, CHO: 0g, Sugars: 0g













# Stevia as 2010 Food Trend • Stevia identified as 2010 food trend in The Next Wave: Wellness Food Trends for 2010 www.loodrocossing.com/articles/2009/wellnesstrendsfor/2010.html • With it's natural credentials, stevia opens up the low calorie sweetener marketplace... - "...consumers are driving innovation in the low-sugar beverage area..." - "2010 is going to be the year of reb-A,...you're going to see a number of product intros in beverage and dairy especially." - Warning about the downside of stevia marketplace: "There are newcomers [reb-A suppliers] who don't have GRAS documentation... so beware....look for [reb-A suppliers] with GRAS documentation..."

### Conclusions

- Safety studies and long term use demonstrate safety
  - studies conducted across metabolism, pharmacology and toxicology clearly support safe intake by the general population
- FDA's GRAS self-affirmation process used, no objection to use
- Growing marketplace/consumer demand/desire for tabletop sweeteners and foods & beverages with natural ingredients
- · Stay posted, watch your supermarket aisles..







