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Fenugreek, ingredient added to cigarettes Literature review A preliminary scientific summary

In any brand sold, the maximum use value applied in the tobacco blend is:

• 0,011 mg/cigarette or 0,003% expressed on a dry weight basis.

Summary

Fenugreek^{1,2,3} is a product derived from the herbaceous plant indigenous to western asia, from steam distillation to solvent extraction (volatile hydrocarbon, weak alcohol). Extract is registered as CAS 84625-40-1, FEMA 2485 and Oleoresin as CAS 977018-53-3, FEMA 2486. It is an approved European food-additive³, generally recognized as safe by the Food and Drug Administration⁴. Studies^{5,6,7,8,9,10} have shown a broad margin of safety for fenugreek seed extract. The extract is used primarily for food flavoring.

Composition^{3,11} of fenugreek extract is complex and vary naturally, registered as a "Substances of Unknown or Variable Composition, Complex Reaction Products and Biological Materials". According to its use as a tobacco additive, constituents¹² of relevance were recently determined, showing mainly fatty constituents (around 60%), carbohydrates (around 20%), water and proteins (less than 10%).

Pyrolysis study¹³ referring to the burning of the tobacco rod was performed on fenugreek extract, showing high amounts of fatty esters and traces of volatiles organics constituents (VOC). Nevertheless, no significant and reliable increase of these VOC in mainstream smoke was observed after addition of fenugreek in tobacco blend.

The effect of addition of fenugreek on the composition of tobacco smoke and its biological properties was assessed by key studies 14,15,16,17,18,19,20,21,22,23,24. Most of the studies are based on the comparison of test cigarettes with and without fenugreek extract, isolated or in combination with other ingredients. Outcomes were consistent across the studies 25,26,27, despite the identified limitations 28,29,30. The addition of fenugreek (from 0.001% to 0.6%) didn't result in significant adverse changes in the cigarette smoke composition and biological activity as detailed below:

- *Smoke chemistry*: no significant change was observed in smoke emission of the 39 priority WHO³¹ constituents compare to the control cigarette without ingredient.
- In vitro assays: Addition of fenugreek from 0.01% to 0.03% had no significant effect on cytotoxicity (Neutral Red Uptake assay), mutagenicity (Ames Assay Salmonella typhimurium strains TA98, TA100, TA102, TA1535, TA1537; with and without metabolic activation) and genotoxicity (in vitro Micronucleus assay) of the cigarette smoke.
- In vivo assays: Sub-chronic inhalation studies have shown no discernible effect on the character and the extent of the biological responses normally associated with inhalation

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of mainstream cigarette smoke in rats. No effect was observed on reproductive and developmental toxicities.

Influence of the addition of fenugreek at a high application level (0.02%) was assessed by a clinical study^{23,32} including smoking behavior and nicotine pharmacokinetics:

- No significant effect of the addition of fenugreek was observed on inhalation patterns or nicotine uptake,
- Addition of fenugreek did not alter the smoking behavior as an indicator for a change in the sensory properties of the smoke.

Fenugreek contains carbohydrates and can generate by thermal degradation carbonyls³³ as acetaldehyde. Such carbonyl is a potential inhibitor of the enzyme mono-amine oxidase, suspected to act on nicotine dependence. It was shown previously that mainstream smoke emissions of carbonyls^{13,24} were unchanged following the addition of fenugreek extract. Consequently, addition of fenugreek cannot increase nicotine addiction due to its thermal degradation.

Additionally, epidemiological studies^{34,35,36} shown that there was no statistical evidence that ingredients used in traditional blended cigarettes affect smoking cessation patterns.

To conclude, gaps identified previously^{37,38} seem to be fully filled by the literature. Addition of fenugreek seed extract, especially at the current used levels does not discernibly alter the biological effects normally associated with cigarette mainstream smoke.

SYNAPCION B. TEILLET

REFERENCES

¹ Budavari S., O'Neil, M.J., (Ed.) 1989. The Merck Index: An Encyclopedia of Chemicals, Drugs, and Biologicals (11th ed.). Glycerol, P3952.

² Burdock G.A., 2002 Fenaroli's handbook of flavor ingredients, fourth edition, CRC Press, pp 624-626.

³ ECHA, 2019 REACH dossier of *Fenugreek, ext.*, available from https://echa.europa.eu/registration-dossier/

⁴ U.S. Food & drug administration, 2018. Fenugreek. Code of Federal Regulations, Title 21, Volume 3, 21CFR182.20.

⁵ Kandhare A.D., Thakurdesai P.A., Wangikar P., Bodhankar S. L., 2019. A systematic literature review of fenugreek seed toxicity by using ToxRTool: evidence from preclinical and clinical studies. Heliyon, 5(4):e01536.

⁶ Flammang A.M., Cifone M.A., Erexson G. L., Stankowski Jr L. F. 2004. Genotoxicity testing of a fenugreek extract. Food and Chemical Toxicology, 42: 1769-1775.

Wankhede S., Mohan V., Thakurdesai P.A., 2016. Beneficial effects of fenugreek glycoside supplementation in male subjects during resistance training: A randomized controlled pilot study. J. Sport Health Sci. 5(2):176-182.

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- ⁸ Deshpande P. O., Mohan V., Thakurdesai P.A., 2017. Preclinical toxicological evaluation of IDM01: The botanical composition of 4-Hydroxyisoleucine- and trigonelline-based standardized fenugreek seed extract. Pharmacognosy res. 9(2):138-150.
- ⁹ Deshpande P. O., Mohan V., Pore M. P., Gumaste S., Thakurdesai P.A., 2017. Prenatal Developmental Toxicity Study of Glycosides-based Standardized Fenugreek Seed Extract in Rats. 13 (Suppl 1): S135-S141.
- ¹⁰ Deshpande P., Mohan V., Pore M., Gumaste S., Thakurdesai P., 2016. Prenatal developmental toxicity evaluation of furostanol saponin glycoside based standardized fenugreek seed extract during organogenesis period of pregnancy in rats. Int J Pharm Pharm Sci. 8, 124-129.
- ¹¹ Ahmad A., Alghamdi S. S., Mahmood K, Afzal M. 2016. Fenugreek a multipurpose crop: Potentialities and improvements. Saudi Journal of Biological Sciences 23, 300-310.
- ¹² Simms, L., Clarke, A., Paschke, t., Manson, A., Murphy, J., Stabbert, R., Esposito, M., Roemer, E., Freiesleben, J., Kim, H.Y., Lindegard, T., Scharfe, M., Vincze, I., Vlachos, P., Wigotzki, D., Pollner, G., Lutz, R., 2019. Assessment of Priority Tobacco Additives Per the Requirements of the EU Tobacco Products Directive (2014/40/EU) Part 1: Background, Approach, and Summary of Findings. Regul. Toxicol. Pharmacol. 104, 84–97 Supplemental Table S1c.
- ¹³ Baker, R.R., Bishop, L.J., 2005. The pyrolysis of non-volatile tobacco ingredients using a system that simulates cigarette combustion conditions. J. Anal. Appl. Pyrol. 74 (1–2), 145–170.
- ¹⁴ Gaworski, C.L., Dozier, M.M., Heck, J.D., Gerhart, J.M., Rajendran, N., David, R.M., Morrissey, R.L., 1998. Toxicologic evaluation of flavor ingredients added to cigarette tobacco: 13-week inhalation exposures in rats. Toxicology 10 (4), 357–381.
- 15 Carmines, E.L., 2002. Evaluation of the potential effects of ingredients added to cigarettes. Part 1: cigarette design, testing approach, and review of results. Food Chem. Toxicol. 40 (1), 77–91.
- ¹⁶ Rustemeier, K., Stabbert, R., Haussmann, H.J., Roemer, E., Carmines, E.L., 2002. Evaluation of the potential effects of ingredients added to cigarettes. Part 2: chemical composition of mainstream smoke. Food Chem. Toxicol. 40, 93–104.
- ¹⁷ Roemer, E., Tewes, F.J., Meisgen, T.J., Veltel, D.J., Carmines, E.L., 2002. Evaluation of the potential effects of ingredients added to cigarettes. Part 3: in vitro genotoxicity and cytotoxicity. Food Chem. Toxicol. 40, 105–111.
- ¹⁸ Vanscheeuwijck, P.M., Teredesai, A., Terpstra, P.M., Verbeeck, J., Kuhl, P., Gerstenberg, B., Gebel, S., Carmines, E.L., 2002. Evaluation of the potential effects of ingredients added to cigarettes. Part 4: subchronic inhalation toxicity. Food Chem. Toxicol. 40 (1), 113–131.
- ¹⁹ Baker, R.R., da Silva, J.R.P., Smith, G., 2004. The effect of tobacco ingredients on smoke chemistry. Part I: flavourings and additives. Food Chem. Toxicol. 42 (Suppl. I), S3–S37.
- ²⁰ Renne, R.A., Yoshimura, H., Yoshino, K., Lulham, G., Minamisawa, S., Tribukait, A., Dietz, D.D., Lee, K.M., Westerberg, R.B., 2006. Effects of flavoring and casing ingredients on the toxicity of mainstream cigarette smoke in rats. Inhal. Toxicol. 18 (9), 685–706.
- ²¹ Gaworski, C.L., Oldham, M.J., Wagner, K.A., Coggins, C.R.E., Patskan, G.J., 2011. An evaluation of the toxicity of 95 ingredients added individually to experimental cigarettes: approach and methods. Inhal. Toxicol. 23 (Suppl. 1), 1–12.
- ²² Coggins, C.R., Edmiston, J.S., Jerome, A.M., Langston, T.B., Sena, E.J., Smith, D.C., Oldham, M.J., 2011. A comprehensive evaluation of the toxicology of cigarette ingredients: essential oils and resins. Inhal. Toxicol. 23 (Suppl. 1), 41–69.
- ²³ Simms, L., Clarke, A., Paschke, t., Manson, A., Murphy, J., Stabbert, R., Esposito, M., Roemer, E., Freiesleben, J., Kim, H.Y., Lindegard, T., Scharfe, M., Vincze, I., Vlachos, P., Wigotzki, D., Pollner, G., Lutz, R., 2019. Assessment of Priority Tobacco Additives Per the Requirements of the EU Tobacco Products Directive (2014/40/EU) Part 1: Background, Approach, and Summary of Findings. Regul. Toxicol. Pharmacol. 104, 84–97.
- ²⁴ Stabbert, R., Ghosh, D., Clarke, A., Miller, J., Crooks, I., Wright, C., Tafin Djoko, D., Larroque, S., Jaccard, G., Roemer, E., Park, C.-H., Esposito, M., 2019. Assessment of priority tobacco additives per the requirements of the EU Tobacco Product Directive (2014/40/EU)- Part 2: Smoke Chemistry and in vitro-Toxicology. Regul Toxicol Pharmacol 104, 163-199.
- ²⁵ Paschke, T., Scherer, G., Heller, W.D., 2002. Effects of ingredients on cigarette smoke composition and biological activity: a literature overview. Beitr. Tabakforsch. Int. 20, 107–247.
- ²⁶ Baker, R.R., Massey, E.D., Smith, G., 2004. An overview of the effects of tobacco ingredients on smoke chemistry and toxicity. Food Chem. Toxicol. 42 (Suppl. I), S53–S83.
- ²⁷ Rodgman, A., 2004. Some studies of the effects of additives on cigarette mainstream smoke properties. III. Ingredients reportedly used in various commercial cigarette products in the USA and Elsewhere. Beitr. Tabakforsch. Int. 21, 47-104.
- ²⁸ Thielen, A., 2005. Experimental assessment of the toxicological effects of inhaled complex mixtures on the respiratory system feasibility and limitations. Beitr. Tabakforsch. Int. 21, 419-422.
- ²⁹ Gaworski, C.L., Wagner, K.A., Morton, M.J., Oldham, M.J., 2011. Insights from a multi-year program designed to test the impact of ingredients on mainstream cigarette smoke toxicity. Inhal. Toxicol. 23 Suppl 1:172-83.

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- Oldham, M.J., Haussmann, H.J., Gomm, W., Rimmer, L.T., Morton, M.J., McKinney Jr., W.J., 2012. Discriminatory power of standard toxicity assays used to evaluate ingredients added to cigarettes. Regul. Toxicol. Pharmacol. 62 (1), 49–61.
- ³¹ WHO, 2015. WHO Study Group on Tobacco Product Regulation: Report on the Scientific Basis of Tobacco Product Regulations. Fifth Report of a WHO Study Group. Technical Report Series 989. World Health Organization, Geneva, Switzerland
- ³² McEwan, M., Coburn, S., Ghosh, D., Simms, L., Giles, L., Yuki, D., Ashley, M., Roemer, E., Sohn, H.-O., Proctor, C., 2019. Assessment of priority tobacco additives per the requirements of the EU Tobacco Product Directive (2014/40/EU) Part 3: Smoking behaviour and plasma nicotine pharmacokinetics. Regul Toxicol Pharmacol 104, 29-38.
- 33 SCENIHR, 2010. Addictiveness and Attractiveness of Tobacco Additives Brussels, Belgium. European Commission, Directorate General for Health & Consumers.
- ³⁴ Sanders, E., Weitkunat, R., Utan, A., Dempsey, R., 2012. Does the use of ingredients added to tobacco increase cigarette addictiveness?: a detailed analysis. Inhal. Toxicol. 24 (4), 227–245.
- ³⁵ Oxford economics, 2012. The impact of cigarette ingredients on quit ratios February 2012
- Rodger M., Slater A., 2018. The Influence of Cigarette Ingredients on Smoking Cessation Rates. Beitr. Tabakforsch. Int. 28, 65-80.
- ³⁷ SCENIHR, 2016. Scientific Committee on Emerging and Newly Identified Health Risks, Final Opinion on Additives Used in Tobacco Products (Opinion 1), Tobacco Additives I. European Commission, Luxembourg.
- ³⁸ SCHEER, 2016. Scientific Committee on Health, Environmental and Emerging Risks, Opinion on Additives Used in Tobacco Products (Opinion 2), Tobacco Additives II. European Commission, Brussels.