



National Institute of
Environmental Health Sciences
Division of the National Toxicology Program

Applying the Latest Toxicology Tools to Botanical Safety Evaluation

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of Environmental Health Sciences

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November 18, 2021



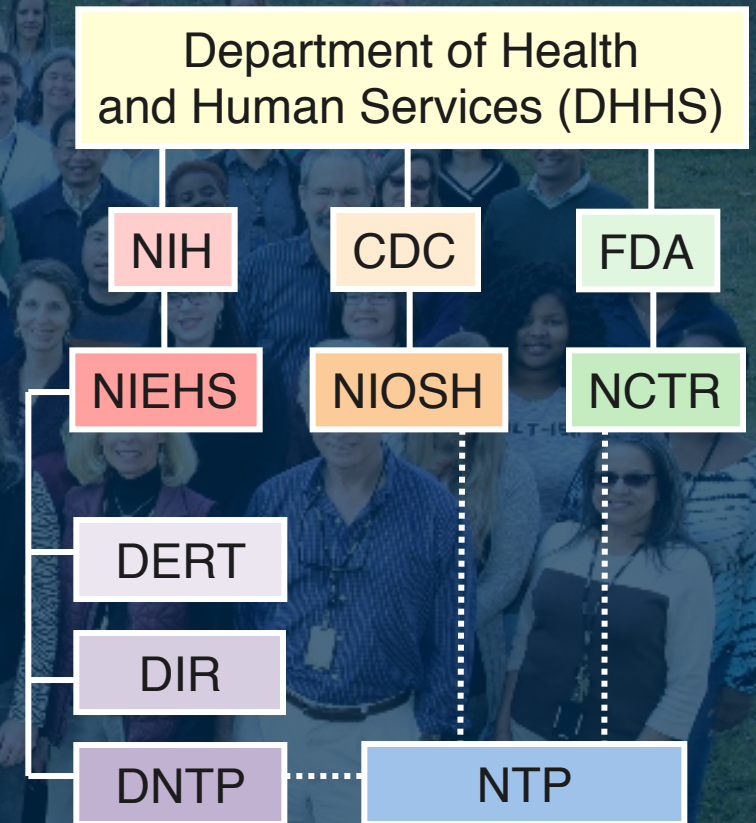
- The National Toxicology Program
- Rationale for evaluating botanical safety
- Use of innovative methods and technologies for understanding botanical safety
- The Botanical Safety Consortium





National Toxicology Program

- Interagency program
 - Headquartered at NIEHS
- Research on nominated test articles
 - Thousands of agents evaluated in comprehensive toxicology studies
 - GLP compliant testing through government contracts
- Analysis activities
 - Report on Carcinogens (RoC)
 - Health Assessment and Translation Reports
 - NTP Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM)



Mission: To evaluate agents of public health concern by developing and applying tools of modern toxicology and molecular biology.



National Toxicology Program

**Bisphenol A &
Analogues**



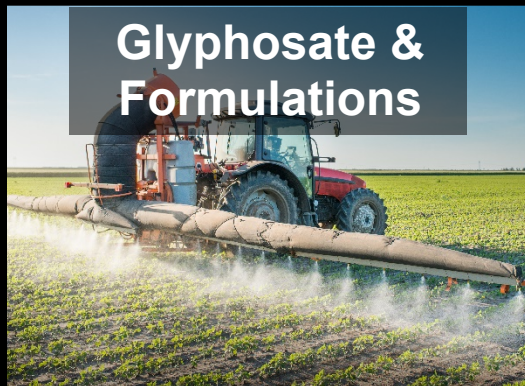
**Botanical Dietary
Supplements**



Cell Phones



**Glyphosate &
Formulations**



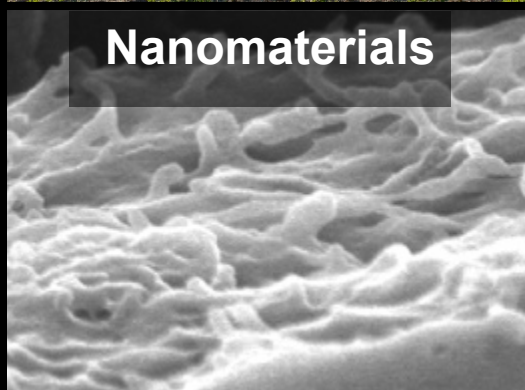
**Medicines &
Therapeutics**



Mold



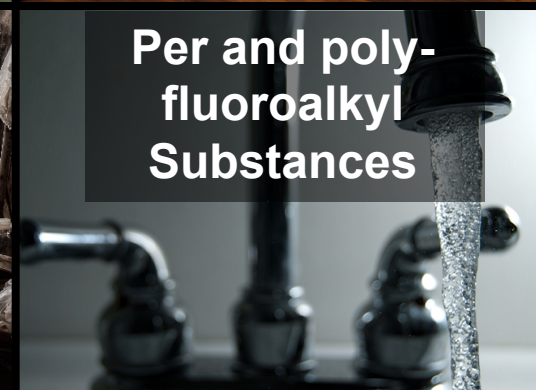
Nanomaterials



**Polycyclic Aromatic
Compounds**



**Per and poly-
fluoroalkyl
Substances**



Why study botanicals?



- Many people take botanical dietary supplements – about 18% of US population
- Recommended doses can be high (100s - 1000s mg per day)
- Adverse events following botanical use have been reported
- Safety data are often inadequate
- Concerns about quality and integrity of botanical products

Completed:

- *Aloe vera*
- Bitter orange
- Ephedra
- *Ginkgo biloba*
- Ginseng
- Goldenseal
- Gum guggul
- Kava kava
- Milk thistle
- Senna

Ongoing:

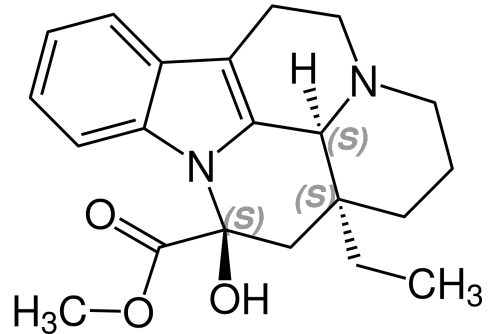
- Black cohosh
- Dong quai
- *Echinacea purpurea*
- *Garcinia cambogia*
- Usnea lichen
- Valerian root



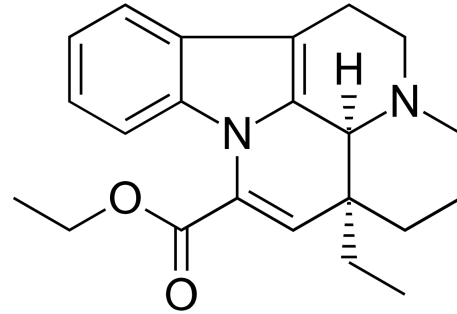
- Identify knowledge gaps
 - Specific concern: Ephedra and cardiotoxicity
 - General: Lack of toxicity and carcinogenicity data
- Test article selection
 - Authentic and representative of marketplace
- Fit for purpose study design
 - *In vivo* (e.g., mice and rats) to characterize hazard
 - Complementary New Approach Methodologies (NAMs) to elucidate mechanism of action or to translate from rodent to human



Vincamine



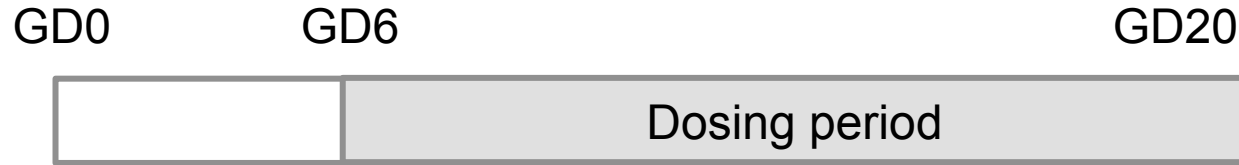
Vinpocetine



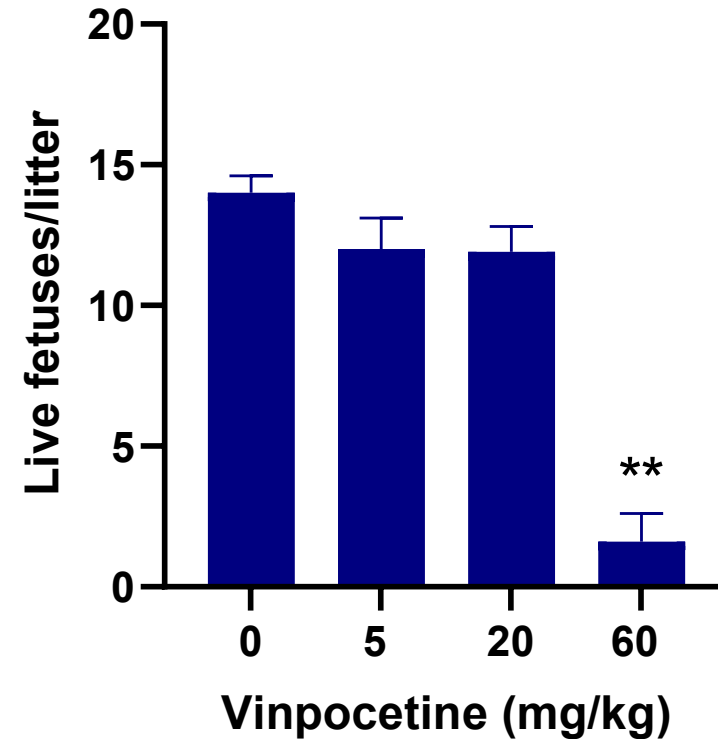
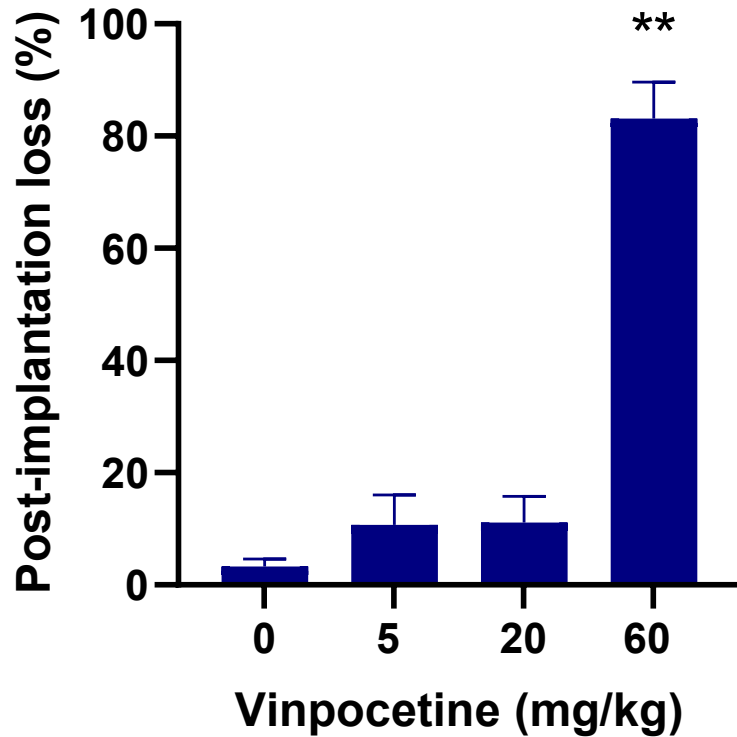
Scoping the safety issues:

- Vinpocetine is a pure synthetic chemical (not found in nature)
- Lack of comprehensive toxicity data
- Some signs of potential developmental toxicity (summarized in Cholnoky and Dömök 1976)





GD21
Evaluation of dams and fetuses





FDA STATEMENT

Statement on warning for women of childbearing age about possible safety risks of dietary supplements containing vinpocetine



For Immediate Release:

June 03, 2019

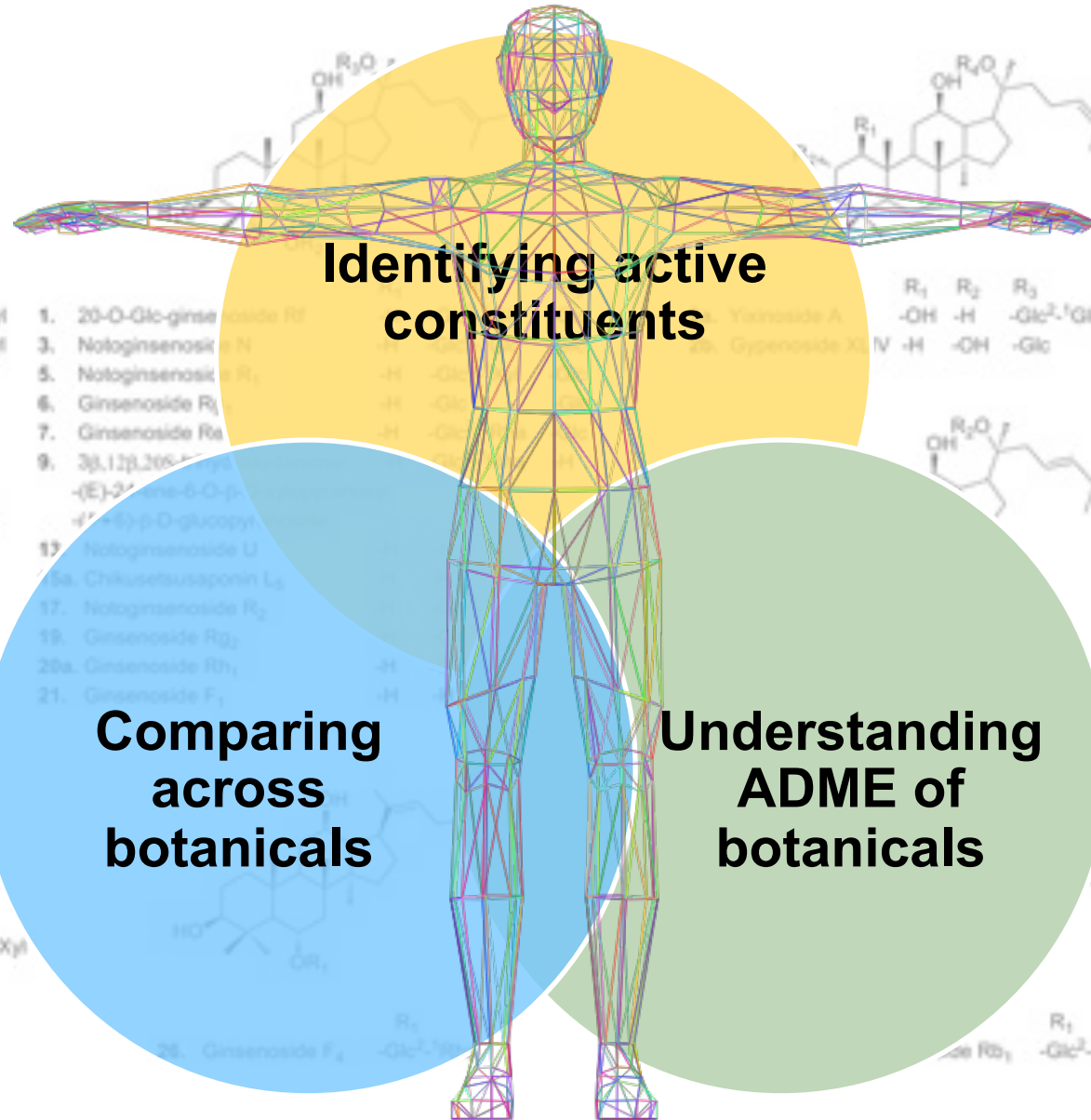
Statement From:

Amy Abernethy, MD, PhD.

Principal Deputy Commissioner - Office of the Commissioner

Frank Yiannas

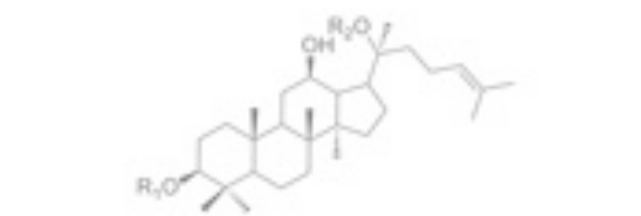
Deputy Commissioner for Food Policy and Response - Food and Drug Administration



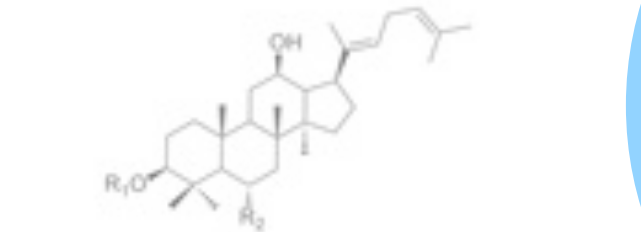
Identifying active constituents

Comparing across botanicals

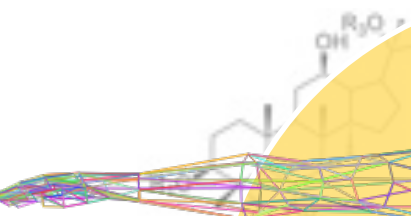
Understanding ADME of botanicals



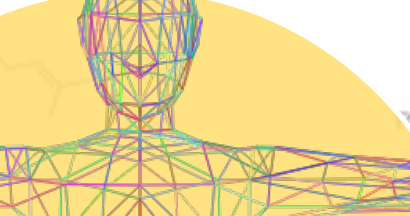
	R ₁	R ₂
11a. Notoginsenoside D	-Glc ²⁻¹ Glc ⁴⁻¹ Xyl	-Glc ⁴⁻¹ Glc ⁴⁻¹ Xyl
11b. Notoginsenoside T	-Glc ²⁻¹ Glc ²⁻¹ Xyl	-Glc ⁴⁻¹ Glc ⁴⁻¹ Xyl
12. Notoginsenoside Fa	-Glc ²⁻¹ Glc ²⁻¹ Xyl	-Glc ⁴⁻¹ Glc
14. Chikusetsusaponin VI	-Glc ²⁻¹ Glc ⁴⁻¹ Xyl	-Glc ⁴⁻¹ Glc
15b. Notoginsenoside I	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Glc
18. Ginsenoside Rb ₁	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Glc
20b. Ginsenoside Ra ₁	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Xyl ⁴⁻¹ Xyl
22. Ginsenoside Rd	-Glc ²⁻¹ Glc	-Glc
23. Gypenoside XVII	-Glc	-Glc ⁴⁻¹ Glc
27. Ginsenoside F ₂	-Glc	-Glc
30. 20(5)-Ginsenoside Rg ₃	-Glc ²⁻¹ Glc	-H



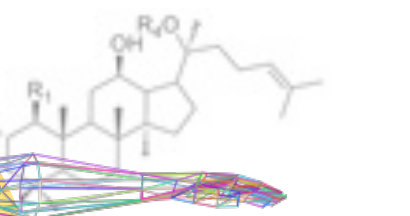
	R ₁	R ₂
25a. 3β,12β-dihydroxydammar-(E)-20(22),24-diene-6-O-β-D-xylopyranosyl-(1→2)-β-D-glucopyranoside	-H	-OGlc ²⁻¹ Xyl
29. Ginsenoside Rh ₄	-H	-OGlc
33. Ginsenoside Rg ₅	-Glc ²⁻¹ Glc	-H



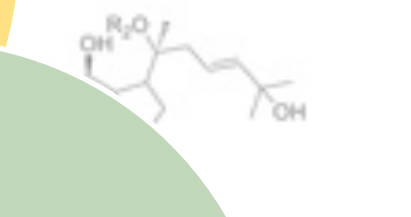
1. 20-O-Glc-ginsenoside Rg1	-H	-Glc
3. Notoginsenoside N	-H	-Glc
5. Notoginsenoside Rg1	-H	-Glc
6. Ginsenoside Rg1	-H	-Glc
7. Ginsenoside Rg1	-H	-Glc
9. 3β,12β-dihydroxydammar-(E)-20(22),24-diene-6-O-β-D-glucopyranosyl-(1→2)-β-D-glucopyranoside	-H	-Glc
13. Notoginsenoside U	-H	-Glc
16a. Chikusetsusaponin L ₂	-H	-Glc
17. Notoginsenoside Rg1	-H	-Glc
19. Ginsenoside Rg ₂	-H	-Glc
20a. Ginsenoside Rh ₁	-H	-H
21. Ginsenoside F ₁	-H	-H



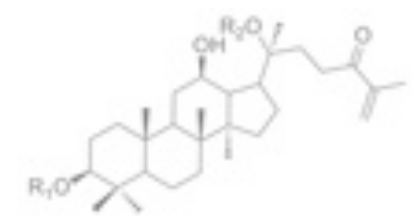
2. 20-O-Glc-ginsenoside Rg2	-H	-Glc
4. Notoginsenoside N	-H	-Glc
8. Ginsenoside Rg2	-H	-Glc
10. 3β,12β-dihydroxydammar-(E)-20(22),24-diene-6-O-β-D-glucopyranosyl-(1→2)-β-D-glucopyranoside	-H	-Glc
11. Notoginsenoside U	-H	-Glc
16b. Chikusetsusaponin L ₂	-H	-Glc
18. Ginsenoside Rb ₁	-H	-Glc
20c. Ginsenoside Ra ₁	-H	-Glc
21. Ginsenoside F ₁	-H	-H



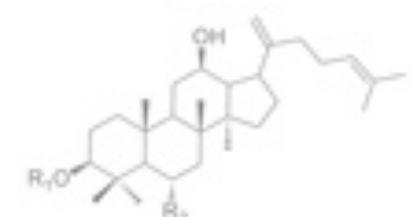
	R ₁	R ₂	R ₃	R ₄
11. Notoginsenoside I	-OH	-H	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Rha
14. Chikusetsusaponin VI	-H	-OH	-Glc	-Glc ⁴⁻¹ Glc



	R ₁	R ₂
15. Notoginsenoside I	-Glc	Glc ⁴⁻¹ Glc
24. Notoginsenoside T ₅	-H	-OGlc ²⁻¹ Xyl
25b. Ginsenoside Rg ₄	-H	-OGlc ²⁻¹ Rha
28. Ginsenoside Rg ₃	-H	-OGlc
32. Ginsenoside Rg ₁	-Glc ²⁻¹ Glc	-H
26. Ginsenoside F ₂	-Glc ²⁻¹ Glc	-H
27. Ginsenoside F ₂	-Glc ²⁻¹ Glc	-H
31. Falcarindiol	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Glc



	R ₁	R ₂
8. Vinaginsenoside R ₂₀	-Glc ²⁻¹ Glc	-Glc



24. Notoginsenoside T ₅	-H	-OGlc ²⁻¹ Xyl
25b. Ginsenoside Rg ₄	-H	-OGlc ²⁻¹ Rha
28. Ginsenoside Rg ₃	-H	-OGlc
32. Ginsenoside Rg ₁	-Glc ²⁻¹ Glc	-H
31. Falcarindiol	-Glc ²⁻¹ Glc	-Glc ⁴⁻¹ Glc

Sufficient similarity = phytoequivalence

Two mixtures are similar enough that data from one mixture (*reference mixture*) can be used to estimate safety or risk from exposure to another (*mixture of interest*)



Why is this important?

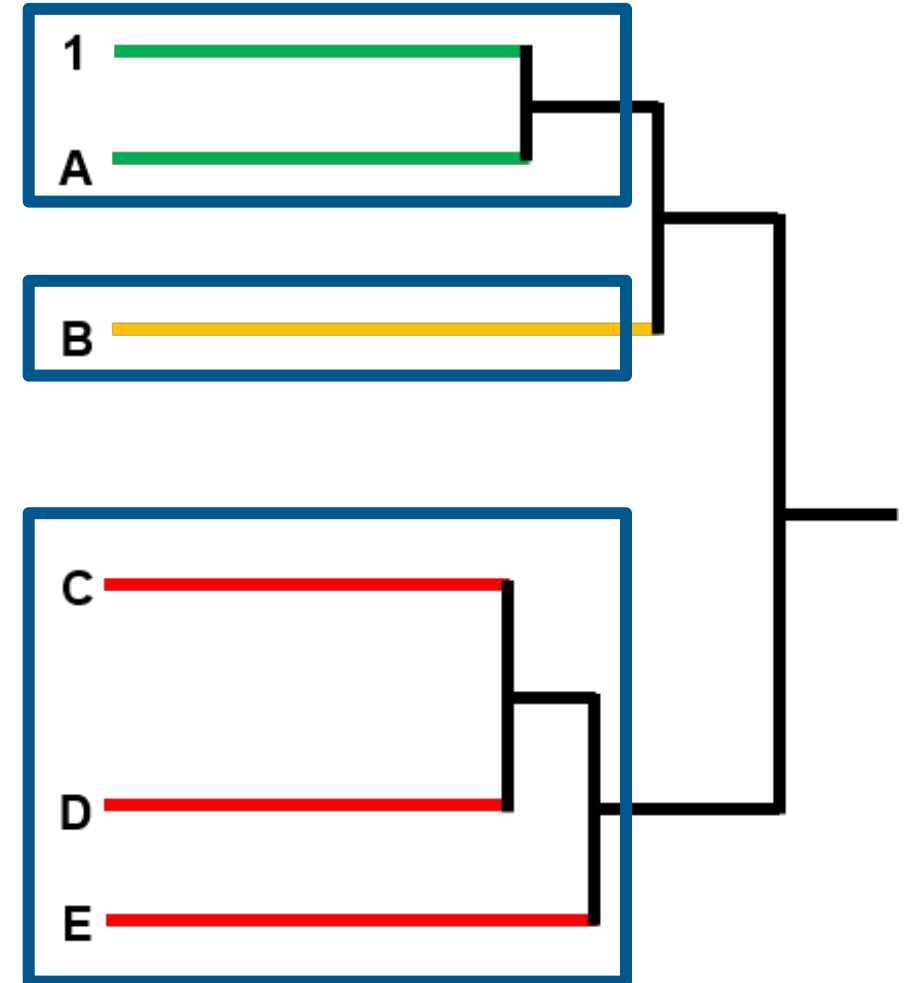
There are thousands of products in the marketplace and we are not going to test all of them

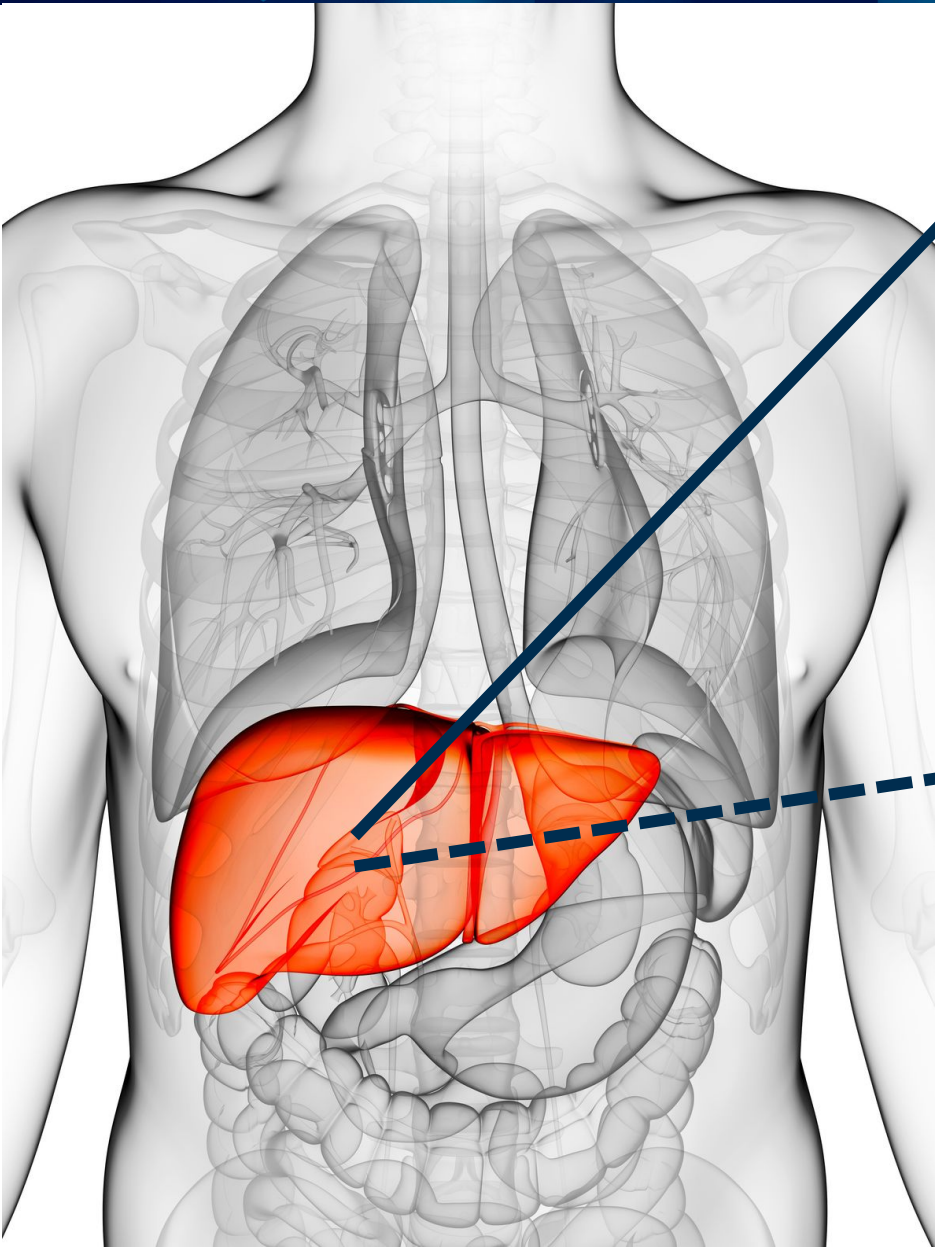
- Has been used in traditional medicine for a very long time
- Current use of *Ginkgo biloba* is often as a leaf-based extract to promote circulation and brain function
 - Large epidemiological studies did not find an improvement in memory with *Ginkgo biloba* extract use
- Typically taken in tablet or capsule form with recommended doses of 120-240 mg per day
- Selected for testing based on a lack of toxicity and carcinogenicity data
 - Liver and thyroid identified as targets of *Ginkgo biloba* in mice and rats

Key question: Can we use data from the test article to evaluate the safety of other *Ginkgo biloba* products?



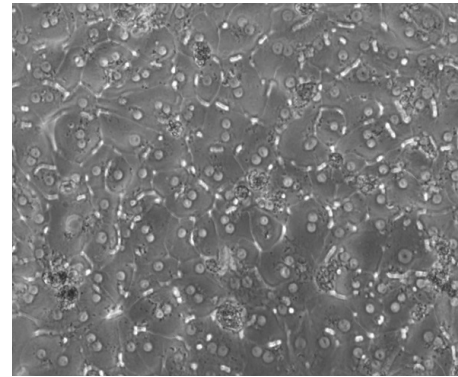
1. Generate data (any kind of data – chemistry, *in vitro*, *in vivo*) on the reference and mixtures of interest
2. Apply multivariate statistical approaches to analyze data (PCA, hierarchical clustering)
3. Make similarity judgment for each mixture
 - a) Mixtures in the same group as the reference are considered “similar”
 - b) Mixtures in the most different group are considered “different”
 - c) Mixtures in neither the most similar or the most different groups are considered “maybe similar”





Model system

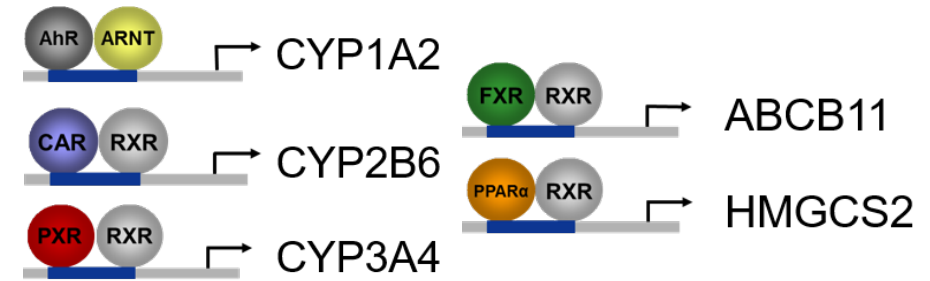
Human primary hepatocytes



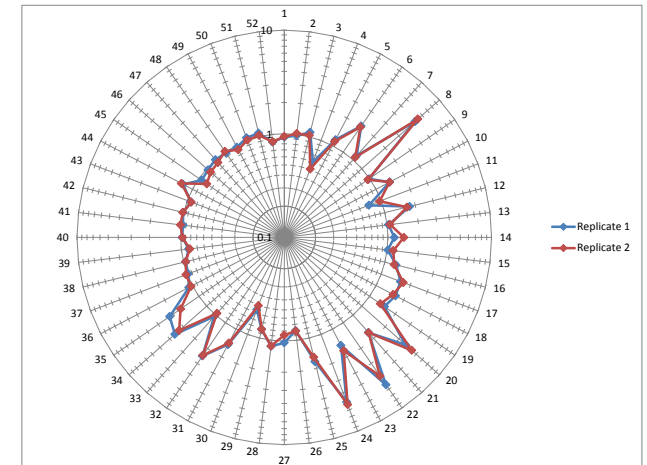
Attagene Factorial™ Assays
in HepG2 cells - immortalized
cell line derived from human
liver carcinoma cells

Endpoints

Expression of genes indicating
activity of key metabolizing enzymes



Numerous transcription factors
and nuclear receptors



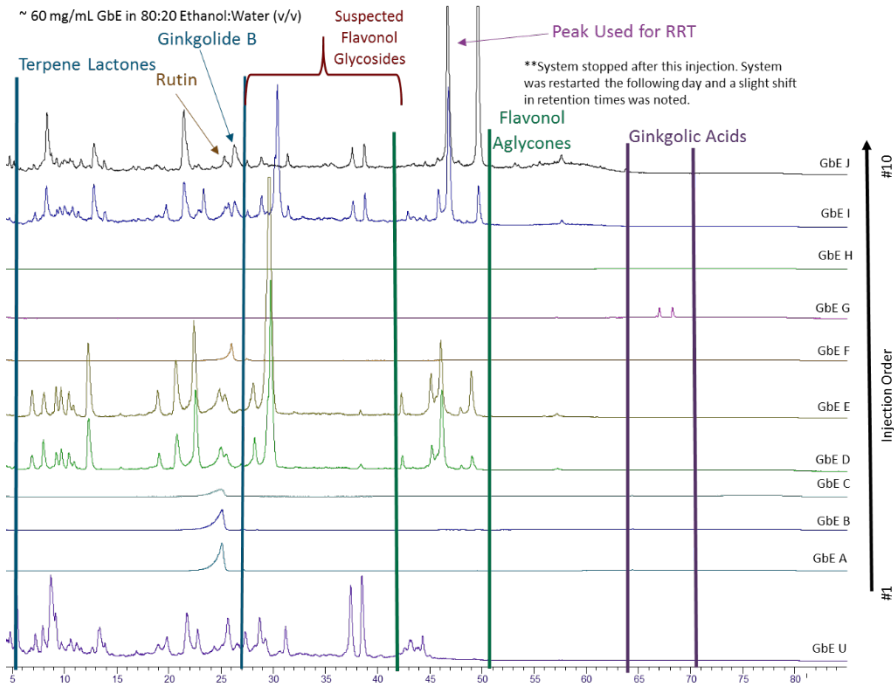
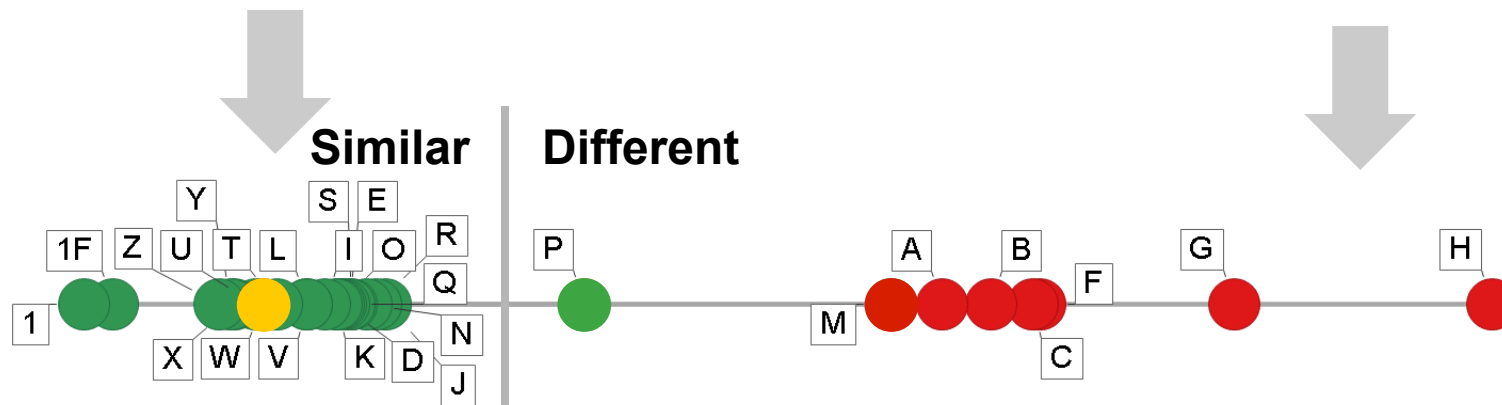
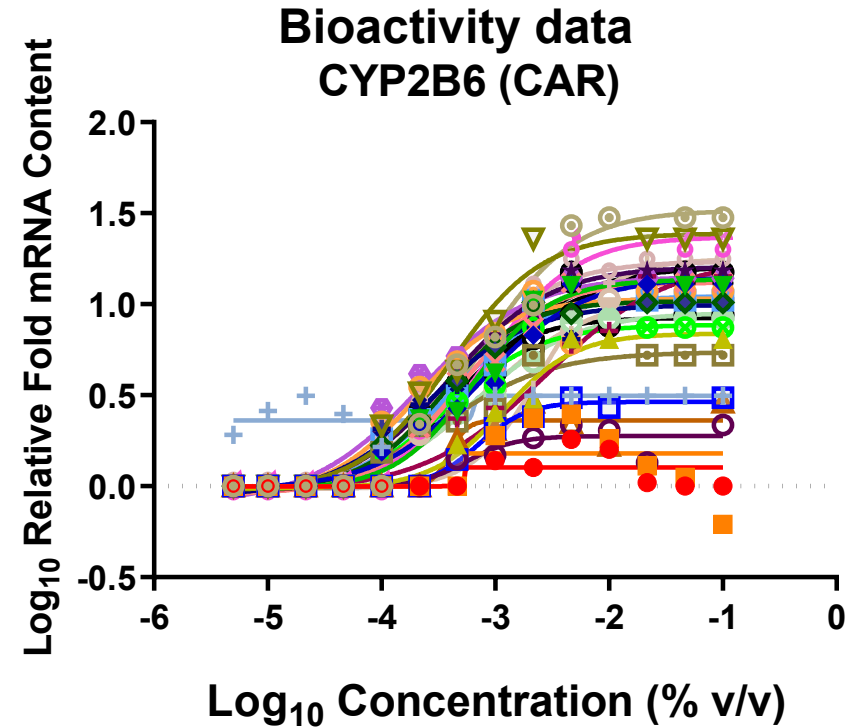
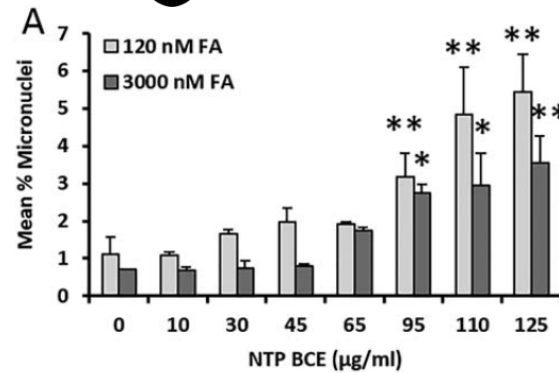
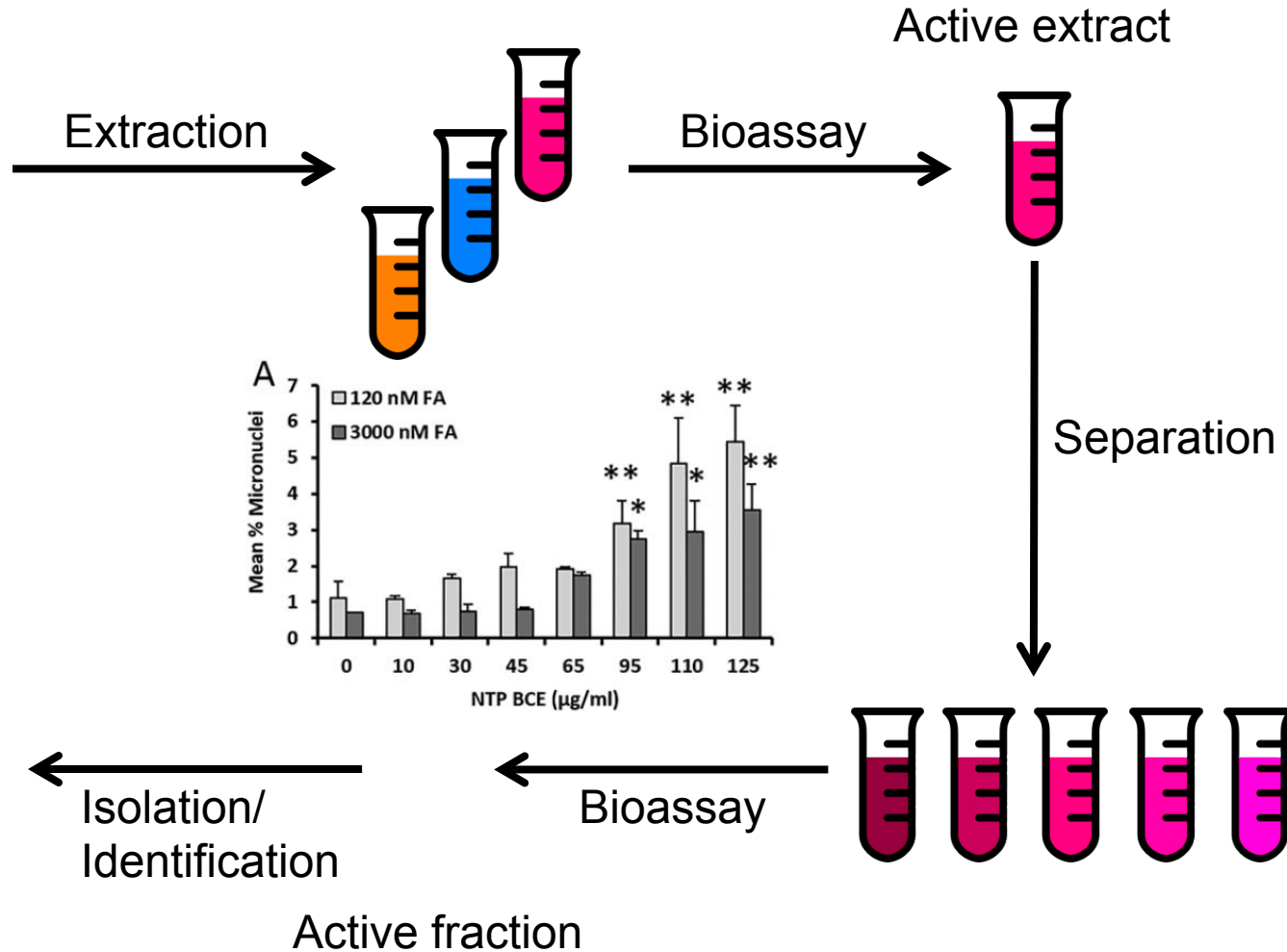


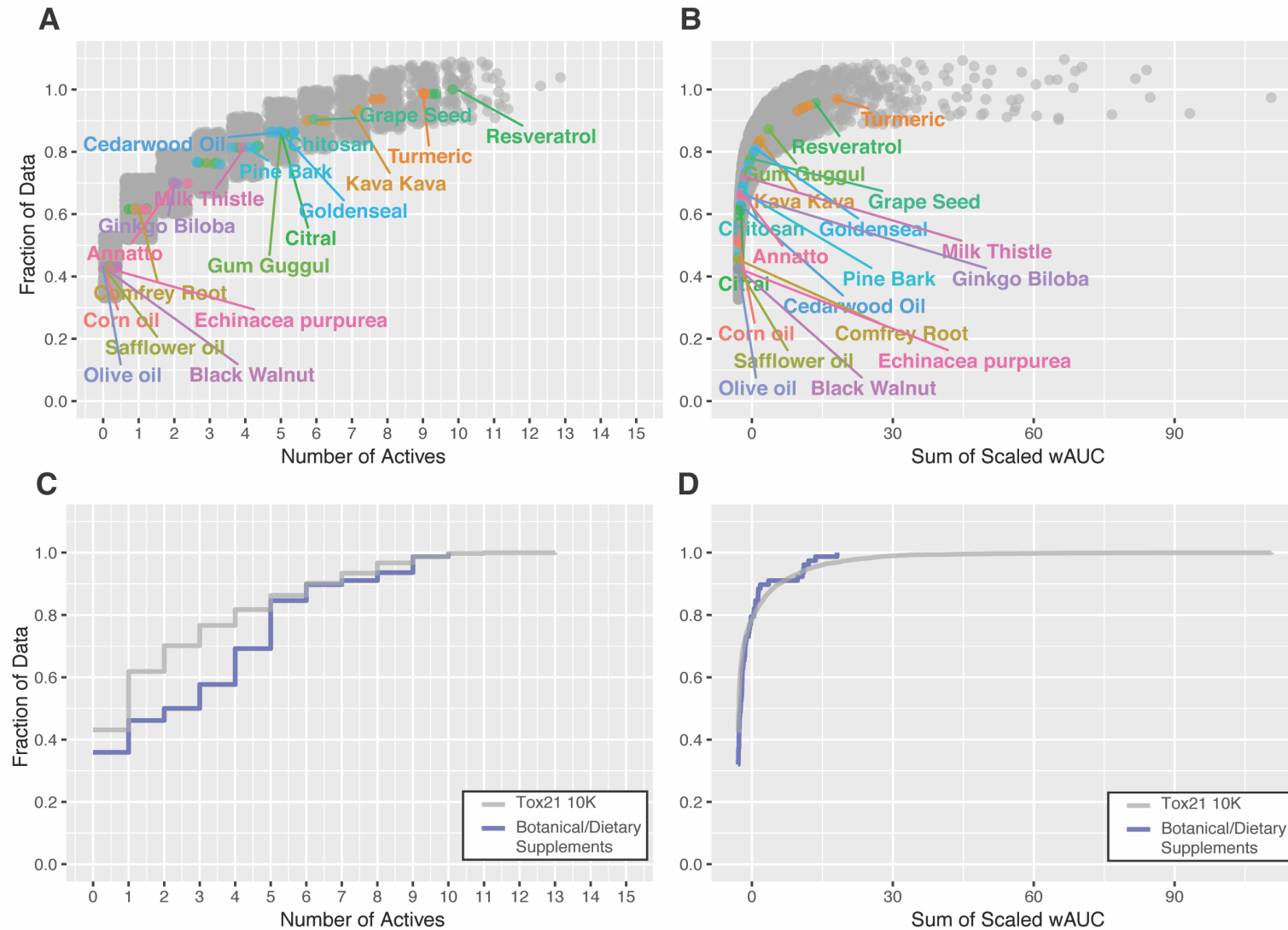
Figure 2. Non-Targeted Fingerprint Chromatograms of First Set of GbE Samples (Not Hydrolyzed), HPLC-ELSD



Bioassay guided fractionation



Chemical Structure





A public-private partnership to improve botanical safety

BOTANICAL SAFETY CONSORTIUM

The Botanical Safety Consortium (BSC) was officially convened in November 2019, as the result of a Memorandum of Understanding between the US Food and Drug Administration (FDA), the National Institutes of Health's National Institute of Environmental Health Sciences (NIEHS), and the non-profit Health and Environmental Sciences Institute (HESI).



[Get Involved](#)

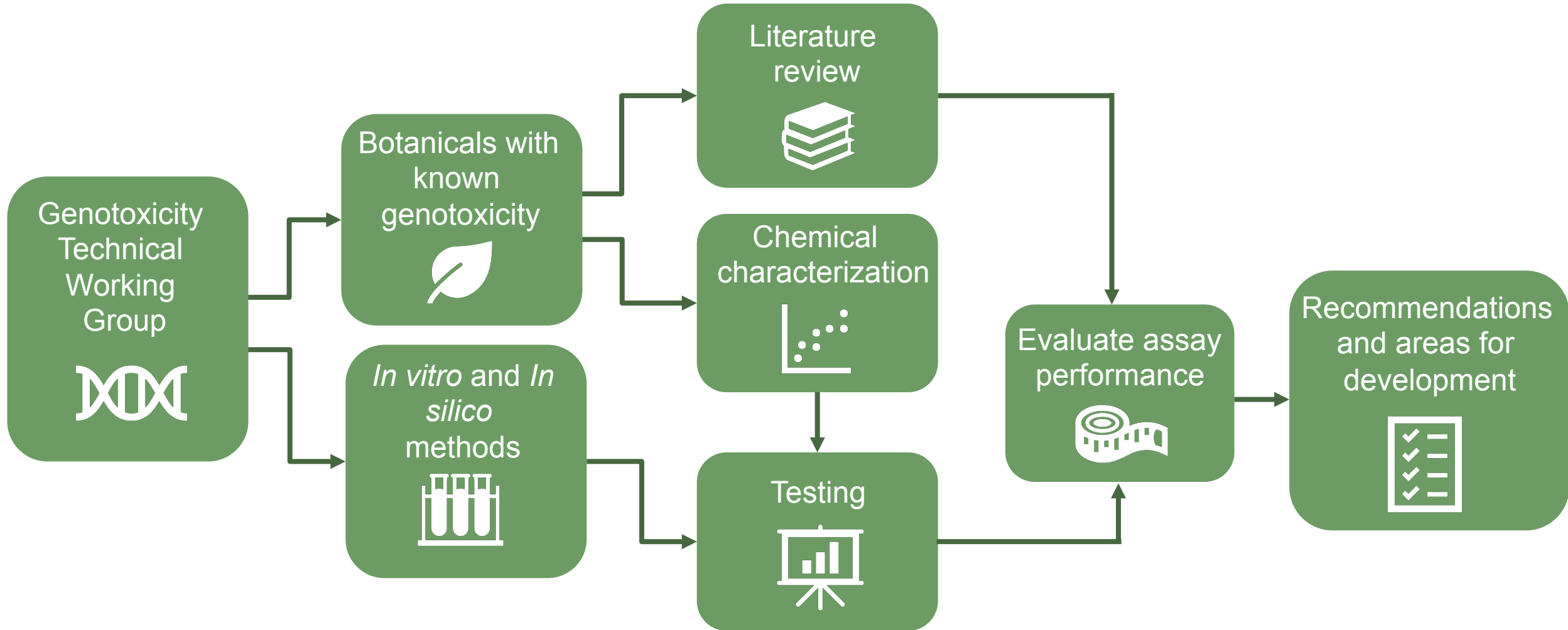


[At a Glance](#)



[Learn More](#)





- Botanicals present an important public health challenge due to their widespread use, high doses, and complex chemistry
- While animal studies represent an important tool for evaluating the safety of botanical ingredients, predictive new approach methodologies are needed for more rapid and cost-effective screening purposes
- *In vitro* assays have been successfully applied to determine sufficient similarity of complex botanical mixtures and identify active constituents through bioassay guided fractionation
 - Correlation between *in vivo* findings and responses in human cells
 - Allow for testing of numerous samples
- The Botanical Safety Consortium is dedicated to expanding the toolbox of methods available for botanical assessment and providing a recommended framework for evaluating botanical safety



Acknowledgements

DNTP *Ginkgo biloba* project



Suramya
Waidyanatha



Brad Collins



Stephen Ferguson



Sreenivasa
Ramaiahgari



Julie Rice



Paul Dunlap



Jim Harnly (USDA)



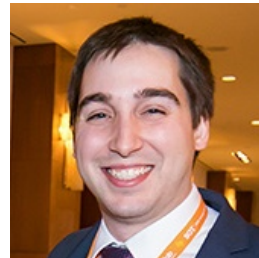
Scott Auerbach

DNTP Black cohosh project



Stephanie Smith-Roe

DNTP Botanicals in Tox21



Troy Hubbard



Jui-Hua Hsieh

Genotoxicity Working Group



Kristine Witt



Stefan Pfuhrer
P&G

Botanical Safety Consortium Steering Committee



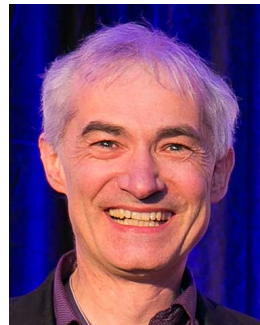
Michelle
Embry
HESI



Connie
Mitchell
HESI



Cara
Welch
USFDA



Stefan Gafner
ABC



Dan
Marsman
P&G



Holly
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AHPA



Hellen Oketch-
Rabah
USP



Elan Sudberg
Alkemist



Olaf Kelber
Bayer



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Thank you!