

Date:

DEPARTMENT OF HEALTH & HUMAN SERVICES

MAR 2 2 2001

Public Health Service Food and Drug Administration

Memorandum

From:	Director, Division of Standards and La Products, Labeling and Dietary Supple	beling Regulations, Office of Nutritional ments, HFS-820			
Subject:	75-Day Premarket Notification for New Dietary Ingredients				
То:	Dockets Management Branch, HFA-305				
			0		
	New Dietary Ingredient:	Isoquercetin (quercetin-3-glocoside			
	Firm:	Merck KGaA	ι. L		
	Date Received by FDA:	December 28, 2000	P2:5		
	90-Day Date:	March 28, 2001			

In accordance with the requirements of section 413(a) of the Federal Food, Drug, and Cosmetic Act, the attached 75-day premarket notification for the aforementioned new dietary ingredient should be placed on pubic display in docket number 95S-0316 after March 28, 2001.

Følicia/B. Satchell

955-0316



Food and Drug Administration Washington, DC

MAR 1 3 2001

VIA FACSIMILE AND MAIL

Najib Sehat, Ph.D. Merck KgaA CHN-BS Regulatory Affairs, C11/243 Frankfurter Str. 250 64271 Darmstadt, Germany

Dear Dr. Sehat:

This is in response to your letter to the Food and Drug Administration dated December 20, 2000, making a submission of a new dietary ingredient pursuant to 21 U.S.C. 350b(a)(2) (section 413(a)(2) of the Federal Food, Drug, and Cosmetic Act (the act)). Your letter notified FDA of your intent to market a dietary supplement product containing the new dietary ingredient described as "isoquercetin."

21 U.S.C. 350b(a)(2) requires that a manufacturer or distributor of a dietary supplement that contains a new dietary ingredient submit to FDA, at least 75 days before the dietary ingredient is introduced or delivered for introduction into interstate commerce, information that is the basis on which the manufacturer or distributor has concluded that a dietary supplement containing such new dietary ingredient will reasonably be expected to be safe. FDA reviews this information to determine whether it provides an adequate basis for such a conclusion. Under section 350b(a)(2), there must be a history of use or other evidence of safety establishing that the dietary ingredient, when used under the conditions recommended or suggested in the labeling of the dietary supplement, will reasonably be expected to be safe. If this requirement is not met, the dietary supplement is deemed to be adulterated under 21 U.S.C. 342(f)(1)(B) because there is inadequate information to provide reasonable assurance that the new dietary ingredient does not present a significant or unreasonable risk of illness and injury.

FDA has carefully evaluated the information in your submission. Your submission contains evidence of history of use and other information that you assert is an adequate basis to conclude that a dietary supplement product containing isoquercetin will reasonably be expected to be safe. To support the safety of isoquercetin, you have submitted information concerning the safety of quercetin. FDA recognizes that quercetin is a component of several foods and is marketed in dietary supplements. However, the agency has concerns about the use of quercetin at the exposures you intend to recommend in your product's labeling, up to 600 milligrams per day. First, quercetin is a known mutagen. In addition, there is some evidence suggesting that quercetin may be a

Page 2 -- Najib Sehat, Ph.D.

carcinogen. Recognizing these unresolved safety concerns, the agency's safety concerns surrounding the use of isoquercetin would be mitigated if the daily exposure were reduced to be more consistent with current daily dietary exposure.

Should you have any questions concerning this matter, please contact me at (202) 205-4168.

Sincerely yours,

Foluna B. Satchell

Felicia B. Satchell Director Division of Standards and Labeling Regulations Office of Nutritional Products, Labeling and Dietary Supplements

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Food and Drug Administration Washington, DC

JAN 1 8 2001

Dr. Najib Sehat Merck KGaA CHN-BS Regulatory Affairs, C11/243 Frankfurter Str. 250 64271 Darmstadt, Germany

Dear Dr. Sehat:

This is to inform you that the notification, dated December 20, 2000, you submitted pursuant to 21 U.S.C. 350b(a)(2) was received and filed by the Food and Drug Administration (FDA) on December 28, 2000. Your notification concerns the substance called "isoquercetin (quercetin-3-glocoside)" that you assert is a new dietary ingredient.

In accordance with 21 C.F.R. § 190.6(c), FDA must acknowledge its receipt of a notification for a new dietary ingredient. For 75 days after the filing date (i.e., after March 13, 2001), you must not introduce or deliver for introduction into interstate commerce any dietary supplement that contains "isoquercetin (quercetin-3-glocoside)"

Please note that the acceptance of this notification for filing is a procedural matter and thus, does not constitute a finding by FDA that the new dietary ingredient or the dietary supplement that contains the new dietary ingredient is safe or is not adulterated under 21 U.S.C. 342. As another procedural matter, your notification will be kept confidential for 90 days after the filing date. After March 28, 2001, your notification will be placed on public display at FDA's Docket Management Branch in docket number 95S-0316. However, any information that is trade secret or otherwise commercial confidential information in the notification will not be disclosed to the public.

Please contact us at (202) 205-4168, if you/have any questions concerning this matter.

Margaret C. Carlson (Acting) Leader Dietary Supplements Team Division of Standards and Labeling Regulations Office of Nutritional Products, Labeling and Dietary Supplements Center for Food Safety and Applied Nutrition Datum December 20, 2000 'Bereich/Abt. CHN BS Zuständig Dr. Najib Sehat Tel. 061 51/72 ' 60 60 Fax 061 51/ 72 89 46 E-mail najib.sehat@merck.de Ihr Schr. vom

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Merck KGaA · Darmstadt Deutschland

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December 20, 2000

Food and Drug Administration
Center for Food Safety and Applied Nutrition, CFSAN
Office of Nutritional Products, Labeling, and Dietary Supplements
HFS-820
Division of Standards and Labeling RegulationsReceived
NC200 C Street, S.W.
Washington, DC 20204
USA2000 C Street, S.W.
Street, S.W.
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Dear Ms. Carlson:

Pursuant to Section 8 of the Dietary Supplement Health and Education Act of 1994, Merck KGaA ("Merck"), located at Darmstadt, Frankfurter Str. 250, 64293, Darmstadt, Germany, submits this new dietary ingredient notification to the Food and Drug Administration ("FDA") for isoquercetin (quercetin-3-glocoside) to be manufactured by Merck.

Merck's isoquercetin product is intended for use as a dietary ingredient in dietary supplements. The product was critically evaluated by a panel of independent recognized experts, which published its expert opinion on May 31, 2000. The panel unanimously concluded that under the conditions of intended use as a dietary ingredient in dietary supplements, Merck's isoquercetin product, meeting food grade specifications and manufactured in accordance with current good manufacturing practices, would not present a significant or unreasonable risk of illness or injury, and would reasonably be expected to be safe.

Attached is a discussion of the scientific data and information demonstrating that Merck's isoquercetin product, when used under the conditions suggested in the labeling of the dietary supplement, is reasonably expected to be safe. Included in the attachment are the following:

Kommanditgesellschaft auf Aktien Handelsregister AG Darmstadt HRB 6164 Sitz der Gesellschaft: Darmstadt Vorsitzender des Aufsichtsrats: Geschäftsleitung und pers. haftende Gesellschafter: Bernhard Scheuble (Vorsitzender). Michael Römer (stellvertretender Vorsitzender). Michael Becker, Thomas Schreckenbach.

Postfach - 64271 Darmstadt Frankfurter Straße 250 - 64293 Darmstadt Telefon 0.6151/72-0 Telefax 0.6151/72-2000 - Telev 310.228-0 om d Harden Schr. vom Ihre Zeichen

- (1.0) chemistry, manufacturing, and
- (2.0) a description of the proposed use; and
- (3.0) safety data, and
- (4.0) a conclusion, and
- (5.0) a list of references.

Sincerely,

Merck KGaA

ppa.

Dr. Roland Martin

i. V.

Dr. Najib Sehat

Dr. Najib Sehat Merck KGaA CHN-BS Regulatory Affairs, C11/243 64271 Darmstadt Germany

Enclosures:

- Expert Panel Opinion Statement: The Safety of Isoquercetin Dietary Supplement Product Manufactured by Merck KGaA.

- Copy of cited references

Kommanditgesellschaft auf Aktien Handelsregister AG Darmstadt HRB 6164 Sitz der Gesellschaft: Darmstadt Vorsitzender des Aufsichtsrats:

Geschäftsleitung und pers. haftende Gesellschafter: Bernhard Scheuble (Vorsitzender). Michael Römer (stellvertretender Vorsitzender). Michael Becker, Thomas Schreckenbach. Postfach - 64271 Darmstadt Frankfurter Straße 250 - 64293 Darmstadt Telefon 06151/72-0 Telefax 06151/72-2000 - Telev (19.228-0 am d



Merck KGaA · Darmstadt Deutschland Datum December 20, 2000 Bereich/Abt. CHN-BS, Regulatory Affairs Zuständig Dr. Najib Sehat Tel. 061 51/72 Fax 061 51/ E-mail najib.sehat@merck.de

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Merck KGaA · Darmstadt Deutschland

New Dietary Ingredient Notification Attachement

(Isoquercetin)

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57 99 Geschäftsleitung und perst baltende Gescilschaftert -Bernnahl Schönble Mensteurdert.

Victure Date: Le contra contra contrast esti-Michael Becker, l'homos Settrecsenadeh. Jan Sombroek Postfach - 64271 Darmstadt Frankluner Stende (50) - 64293 (Series, S. E. Ebreise G., M. 7263) Telefax 0.6181.7252000 - Selex 0.19029-0 emid Internet http://www.merek.de DatumDecember 20, 2000Bereich/Abt.CHN-BS, Regulatory AffairsZuständigDr. Najib SehatTel. 0.61 51/72++49 61 51/72-6060Fax 0.61 51/++49 61 51/72-8946E-mailnajib.sehat@merck.deIhr Schr. vomIhre Zeichen

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1.0 Chemistry Considerations Concerning Isoquercetin

1.1 Chemical Name

2-(3,4-Dihydroxyphenyl)-3-(-D-glucofuranosyloxy)-5,7-dihydroxy-4H-1benzopyran-4-one; 3,3',4',5,7-pentahydroxyflavone-3-glucoside

1.2 Chemical Abstract Service (CAS) Registry Number

21637-25-2

1.3 Chemical Synonyms

quercetin-3-glocoside quercetin-3-O-glucose isotrifoliin trifoliin

1.4 Chemical Structure



1.5 Molecular Formula

C₂₁H₂₀O₁₂

1.6 Molecular Weight

464.37

1000 1000 Kommanditgesellschaft auf Aktion Handelsregister AG Darmstadi HRB 6164 Sitz der Gesellschaft: Darmstadt Vorsitzender des Aufsichtsrats: Heinrich Hornef Es turber flesort die Oscio des Geschaftsleitung und pers, haftende Gesellschafter: Bernhard Scheuble (Vorsitzender), Michael Römer (stellvertretender Vorsitzender), Michael Becker, Thomas Schreckenbach, Jan Sombroek Postfach - 64271 Darmstadt Frankfurter Straße 250 - 64293 Darmstadt Telefon 0.61 51/7.2-0 -Telefax 0.61 51/7.2-2000 - Feiex 4.19 328-0 em.d Internet http://www.merek.de Datum December 20, 2000 Datum December 20, 2000 CHN-BS, Regulatory Affairs Dr. Najib Sehat Tet. 0 61 51/72 ++49 61 51/72-6060 Fax 0 61 51/ ++49 61 51/72-8946 E-mail najib.sehat@merck.de Ihr Schr. vom

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1.7 Physical and Chemical Properties

Physical state, color: Yellow needles from water.

pH: Isoquercetin > 98% dissolved in demineralized water (saturated solution) has a pH = 4,85.

Degradation: Between 225-227°C.

Solubility: Sparingly soluble in boiling water, but virtually insoluble in cold; soluble in alkaline solutions with a deep yellow tint.

1.8 Specifications and Manufacturing Method

2.0 Proposed Use

Merck's Isoquercetin product is intended for use as a dietary ingredient in dietary supplements. Such dietary supplements are expected to contain 200 mg isoquercetin per tablet or capsule, and to be consumed one to three times daily.

3.0 Safety Data

As noted above, Merck's isoquercetin dietary supplement product consists of isoquercetin (85%), quercetin (<15%) and rutin (<15%). Quercetin, isoquercetin and rutin (quercetin-3-rutinoside) are bioflavonoids found in nature and are very similar chemically and biologically. The aglycone quercetin is common to all three. Glycosides that contain quercetin have been shown to liberate quercetin in the gastro-intestinal tract. Therefore, the biological effects of these three bioflavonoids would be expected to be identical; that is, the biological effects of quercetin, or rutin.

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The estimated total daily consumption of flavonoids from a normal U.S. diet is one gram/day (Pierpoint, 1986). Most flavonoids are ingested as glycosides

having a relatively high molecular weight. Absorption from the small intestine is very limited due to the molecular weight and the hydrophilicity of the glycosides. The flavonoids pass unchanged into the large intestine where the microflora produce glycosidases that hydrolyze the flavonoid into the aglycone and its sugar. If the intact aglycone is able to resist cleavage of the pyrone ring, the aglycone could be absorbed. However, absorption is very limited. For example, Gugler, et al. (1975) administered quercetin orally to humans at doses of 50-65 mg/kg body weight and did not find unaltered guercetin in the plasma but recovered 53% of the dose as the aglycone in the feces; the remainder was presumably degraded by the microflora in the lower bowel. Quercetin was administered orally to rats at doses of 1 or 2 g/kg bw, and only 0.3% and 0.5% of guercetin was absorbed and excreted unchanged in the urine (MacGregor, 1979 and Crebelli, et al., 1987). The data indicate that the bioavailability of flavonoids, including quercetin, is very low.

A comprehensive summary of the toxicological data for guercetin is presented as Table 1. The acute oral toxicity is very low (>5000 mg/kg bw in the rat and >16000 mg/kg in the mouse). A number of long-term/oncogenicity studies in rates, mice and hamsters have been reported. Stavric (1984) cited 17 feeding studies in which guercetin was administered to rats, mice and hamsters as a dietary admixture in the range of 0.25% to 10%. There was no evidence of carcinogenicity. Quercetin also was reported to induce renal tubular cell ademomas in male Fischer 344 N male rats at the highest level fed, 40000 ppm but not at the lower levels (1000 and 10,000 ppm) (NTP, 1991). Quercetin was not carcinogenic in F344/DuCrj rats as dietary concentrations of 1.25% and 5.0% for two years, nor in mice or golden hamster (at dietary concentrations up to 10%, the highest concentration tested). Quercetin has been reported to be protective against certain chemical carcinogens; it slows the growth of various human cancer cell lines and it may enhance the effect of certain antitumor drugs. The weight of the evidence supports the non-carcinogenicity of quercetin.

Single or multiple doses of 2-2000 mg quercetin/kg bw/day during organogenesis (gestation days 6-15) failed to elicit adverse developmental (teratological) effects in S-D rats. Quercetin was reported to be mutagenic in most in vitro tests but was not mutagenic in most in vivo tests.

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A comprehensive search of the scientific literature for toxicological data for isoquercetin failed to identify any studies. Since isoquercetin is metabolized to quercetin and glucose, one can assume that the biological effects of isoquercetin and quercetin are very similar or identical.

A critical analysis of the available toxicological information on orally administered quercetin indicates that quercetin is very poorly absorbed from the gastrointestinal tract (<1% of an orally administered dose), has a low order of acute and chronic toxicity, is not mutagenic or carcinogenic in appropriate in vivo assays, and is neither a reproductive nor a developmental toxin.

TABLE 1. QUERCETIN PRECLINICAL STUDIES

MUTAGENICITY IN VITRO

TEST	RESULT	REFERENCE
Bacterial mutagenicity (unactivated)	Positive	Bjeldanes, 1977, MacGregor, 1978
		Brown, 1979, Rueff, 1986
Bacterial mutagenicity (metabolic	Positive	Bjeldanes, 1977, Brown, 1979,
activation)		MacGregor, 1978; Rueff, 1986
Gene mutation	Negative	Carver, 1983, Van der Hoeven, 1984
Gene mutation	Positive	Maruta, 1979, Meltz, 1981
		Nakayasu, 1986
Chromosome aberration	Positive	Carver, 1983; Yoshida, 1980;
Sister chromatid exchange	Positive	Carver, 1983, Ishida, 1988
Sister chromatid exchange	Negative	Van der Hoeven, 1984
Micronucleus test	Positive	Popp, 1991

Mutagenicity in Vivo

TEST	SPECIES	RESULT	REFERENCE
Sister chromatid exchange	Rabbit	Negative	MacGregor, 1983
Micronucleus test	Mouse	Negative	Aeschbacher, 1982; MacGregor, 1983 Caria, 1995; Ngomuo, 1996
Micronucleus test	Mouse	Positive	Sahu, 1981
Micronucleus test	Rat	Negative	Utesch, 1998
Host-mediated assay		Negative	Aeschbacher, 1982

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Geschäftsleinung und perschaftende Gesellschafter: Bernhand Scheuble (Vorsitzender), Schweit Scheuble (Vorsitzender), Michael Berker, Thomas Schreckenbach, Jan Sombroel, Postfach - 64271 Darmstadt Frankfurter Straße 250 - 64293 Darmstadt Felefon 9 - 3172-0 Telefax 0 H 5172-2000 - Telex 419328-0 em H Internet http://www.m.j.ck.de

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Acute Toxicity

SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/LD50	REF
Rat		Oral (Gavage)		>5,000 mg/kg bw	Covance, 1998 unpublished
Mouse	· · ·	Oral (Gavage)		>16,000 mg/kg bw	Merck, 1976 unpublished
Mouse	Albino farm	Oral (Gavage)		160 mg/kg bw	Sullivan, 1951
Mouse		IP		4064 mg/kg	Merck, 1976 unpublished
Mouse	Albino farm	SC		98 mg/kg bw	Sullivan, 1951

Reproductive Toxicity

SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	REF
Rat	S-D/Female (pregnant)	Oral	0, 2, 20, 200, 2000 mg/kg bw daily on days 6-15 of preg; or single dose on day 9	Negative	Willhite, 1982
Mouse	(C57xBALB/B) F1 / Male	IP	0, 3.2, 6.4, 16, 32 mg/kg bw for 5 consecutive days (total doses 0, 16, 32, 80, 160 mg/kg)	Paternal Effects (spermatogenesis; testes, epididymis, sperm duct)/ 16 mg/kg total dose	Rastogi, 1987

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Developmental Toxicity

SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	REF
Mouse	Swiss/Male	IP	0; 200, 300, 400	Reduction in fertility	Aravindakshan,
			mg/kg bw in DMSO	of untreated	1985
				females paired with	
				males/200 mg/kg	
				bw	

Chronic Toxicity

SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	REF
Rat	Albino/MF	Oral (Diet)	0, 0.25, 0.5, 1%,	No effect/0.25%	Ambrose, 1952
			410 days		

Carcinogenicity

SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	REF
Rat	F344/Female	Oral (Diet)	0; 1.25; 5.0% for 104 wk	Negative/1.25%	lto, 1989
Rat	F344/Male	Oral (Diet)	0; 1.25; 5.0% for 104 wk	Negative/1.25%	lto, 1989
Rat	F344/Male	Oral (Diet)	0; 1000; 10000; 40000 ppm for 104 wk	Kidney (renal tubule): adenoma	NTP, 1991
Rat	F344/Female	Oral (Diet)	0; 1000; 10000; 40000 ppm for 104 wk	Negative/1000	NTP, 1992
Rat	F344/Male	Oral (Diet)	0; 0.1; 0.2% for 64 wk	Negative	Stoewsand, 1984
Rat	F344/Female	Oral (Diet)	0; 0.1; 0.2% for 64 wk	Negative	Stoewsand, 1984
Rat	ACI	Oral (Diet)	0; 1.0; 5.0% for 540 days	Negative	Hirono, 1981
Rat	F344/Male	Oral (Diet	0; 5% in diet for 4 weeks, followed by ± BHBN in diet for 29 weeks	Negative (only urinary bladder examined)	Hirose, 1983

Kommandit⊴esellschaft auf Aktien Handelsregister AG Darmstadt HRB 6164 Sitz der Gesellschaft: Darmstadt Vorsitzender des Aufsichtsrats: Heinrich Hornef new diet notif attamt, iso-Querc 300

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Hamster	Non-inbred golden	Oral (Diet)	0; 10% for 735 days	Negative	Morino, 1982
Rat	Non-inbred	Oral (Diet)	0; 1% for 58 weeks	Intestinal	Pamukcu, 1980
	albino			(adenoma, libro-	
				adenocarcinoma)	
				Bladder (nanillary	
				sessile transitional	
				cell carcinoma)	
Mouse	Strain A	Oral (Diet)	0; 5% for 23 weeks	Negative (only lung	Hosaka, 1981
				tumor assessed)	
Mouse	ddY M/F	Oral (Diet)	0: 2% for 842 days	Negative (high	Saito, 1980
				mortality)	
Rat	Fischer 344	Oral (Diet)	0; 0.1% for 540 davs	Negative	Takanashi, 1983
Mouse	ICR/Ha	Topical	0; 25 mg in 0.1 ml	No skin tumors	Van Duuren,
	Swiss/Female	•	DMSO to dorsal	induced	1976
,			skin 3x/week for		
			368 days		
Mouse	Albino	Bladder	20 mg cholesterol	No significant	Wang, 1976
	Swiss/Female	implant	pellets containing 4	difference in	
			mg quercetin for	incidence of bladder	
			175 davs – 1 vr	carcinoma	

4.0 Conclusion

Merck's Isoquercetin product, intended for use as a dietary ingredient in dietary supplements providing up to 600 mg isoquercetin daily, and meeting food grade specifications and manufactured in accordance with current good manufacturing practices, would not present a significant or unreasonable risk of illness or injury, and would reasonably be expected to be safe.

5.0 References

Aeschbacher, J.U., Meier, H., Ruch, E. (1982), Nutr. Cancer 4, 90-98

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EXPERT PANEL OPINION STATEMENT: THE SAFETY OF ISOQUERCETIN DIETARY SUPPLEMENT PRODUCT MANUFACTURED BY MERCK KGaA

May 31, 2000

The undersigned, an independent panel of recognized experts (the Expert Panel), qualified by their scientific training and experience to evaluate the safety of food and food ingredients, was asked by Merck KGaA (Merck) of Darmstadt, Germany, to evaluate the safety of Merck's isoquercetin product intended for use as a dietary ingredient in dietary supplements. The qualifications of the Expert Panel members are evidenced in the attached *curricula vitae*.

A comprehensive search of the scientific literature concerning relevant safety and toxicity information through 31March 2000 was conducted by George A. Burdock, Ph.D., and made available to the Expert Panel. The Panel independently and critically evaluated the pertinent articles identified in the literature search, the materials provided by Merck and other data and information deemed appropriate or necessary. Specifically, the Panel considered data and information concerning the method of manufacture including the enzyme source organism, *Penicillium decumbens*; product specifications; chemical analyses of the product; the conditions of intended use; and data and information relating to the safety of the bioflavonoids isoquercetin, quercetin and rutin.

Following independent, critical evaluation of such data and information, the Panel members conferred by conference call. The Expert Panel unanimously concluded that, under the conditions of intended use as a dietary ingredient in dietary supplements, Merck's isoquercetin product, meeting food grade specifications and manufactured in accordance with current good manufacturing practices, would not present a significant or unreasonable risk of illness or injury, and would reasonably be expected to be safe.

A summary of the basis for the Expert Panel's conclusion is provided below.

Intended Use

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Merck's Isoquercetin product is intended for use as a dietary ingredient in dietary supplements. Such dietary supplements are expected to contain 200 mg. isoquercetin per tablet or capsule, and to be consumed one to three times daily.

Data Pertaining to the Safety of Merck's Isoquercetin Product

As noted above, Merck's isoquercetin dietary supplement product consists of isoquercetin (85%), quercetin (<15%) and rutin (<15%). Quercetin, isoquercetin (quercetin-3-glucoside) and rutin (quercetin-3-rutinoside) are bioflavonoids found in nature and are very similar chemically and biologically. The aglycone quercetin is common to all three. Glycosides that contain quercetin have been shown to liberate quercetin in the gastro-intestinal tract. Therefore, the biological effects of these three bioflavonoids would be expected to be identical; that is, the biological effects of quercetin, or rutin.

The estimated total daily consumption of flavonoids from a normal U.S. diet is one gram/day (Pierpoint, 1986). Most flavonoids are ingested as glycosides having a relatively high molecular weight. Absorption from the small intestine is very limited due to the molecular weight and the hydrophilicity of the glycosides. The flavonoids pass unchanged into the large intestine where the microflora produce glycosidases that hydrolyze the flavonoid into the aglycone and its sugar. If the intact aglycone is able to resist cleavage of the pyrone ring, the aglycone could be absorbed. However, absorption is very limited. For example, Gugler, et al (1975) administered quercetin orally to humans at doses of 50-65 mg/kg body weight and did not find unaltered quercetin in the plasma but recovered 53% of the dose as the aglycone in the feces; the remainder was presumably degraded by the microflora in the lower bowel. Quercetin was administered orally to rats at doses of 1 or 2 g/kg bw, and only 0.3% and 0.5% of quercetin was absorbed and excreted unchanged in the urine (MacGregor, 1979 and Crebelli, et al, 1987). The data indicate that the bioavailability of flavonoids, including quercetin, is very low.

A comprehensive summary of the toxicological data for quercetin is presented as Table 1.

The acute oral toxicity is very low (>5000 mg/kg bw in the rat and >16000 mg/kg in the mouse). A number of long-term/oncogenicity studies in rates, mice and hamsters have been reported. Stavric (1984) cited 17 feeding studies in which quercetin was administered to rats, mice and hamsters as a dietary admixture in the range of 0.25% to 10%. There was no evidence of carcinogenicity. Erturk et al (1985) reported that quercetin produced bladder tumors in rats and Pabukeo (1980) reported that quercetin from bracken fern produced intestinal and bladder tumors. Quercetin also was reported to induce renal tubular cell ademomas in male Fischer 344 N male rats at the highest level fed, 40000 ppm but not at the lower levels (1000 and 10,000 ppm) (NTP, 1991). Quercetin was not carcinogenic in F344/DuCrj rats as dietary concentrations of 1.25% and 5.0% for two years, nor in mice or golden hamster (at dietary concentrations up to 10%, the highest concentration tested). Quercetin has been reported to be protective against certain chemical carcinogens; it slows down the growth of various human cancer cell lines and it may enhance the effect of certain antitumor drugs. The weight of the evidence supports the non-carcinogenicity of quercetin.

Single or multiple doses of 2-2000 mg quercetin/kg bw/day during organogenesis (gestation days 6-15) failed to elicit adverse developmental (teratological) effects in S-D rats. Quercetin was reported to be mutagenic in most in vitro tests but was not mutagenic in most in vivo tests.

A comprehensive search of the scientific literature for toxicological data for isoquercetin failed to identify any studies. Since isoquercetin is metabolized to quercetin and glucose, one can assume that the biological effects of isoquercetin and quercetin are very similar or identical.

A critical analysis of the available toxicological information on orally administered quercetin indicates that quercetin is very poorly absorbed from the gastrointestinal tract (<1% of an orally administered dose), has a low order of acute and chronic toxicity, is not mutagenic or carcinogenic in appropriate in vivo assays and is neither a reproductive nor a developmental toxin.

Conclusion

We, the Expert Panel, have critically and independently evaluated the data and information summarized above and conclude that Merck's Isoquercetin product, intended for use as a dietary ingredient in dietary supplements providing up to 600 mg. isoquercetin daily, and meeting food grade specifications and manufactured in accordance with current good manufacturing practices, would not present a significant or unreasonable risk of illness or injury, and would reasonably be expected to be safe.

By:

elleca Kseph F. Borzelleea, Ph.D.

/ Toxicology and Pharmacology, Inc.

Walter H. Glinsmann, M.

Walter H. Glinsmann, M. Glinsmann, Inc.

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Date

June 2000 Date

MUTAGENICITY IN VITRO			
TEST		RESULT	REFERENCE
Bacterial mutagenicity (unactivated)		Positive	Bjeldanes, 1977, MacGregor, 1978
Bacterial mutagenicity (metabolic activation)		Positive	Brown, 1979, Rueff, 1986 Bjeldanes, 1977, Brown, 1977, MacGregor, 1978; Rueff, 1986
Gene mutation		Negative	Carver, 1983, Van der Hoeven, 1984
Gene mutation		Positive	Maruta, 1979, Meltz, 1981
Chromosome aberration		Positive	Nakayasu, 1986 Carver, 1983; Yoshida, 1980; Ishida, 1988
Sister chromatid exchange		Positive	Carver, 1983, Ishida, 1988
Sister chromatid exchange		Negative	Van der Hoeven, 1984
Micronucleus test		Positive	Popp. 1991
Unscheduled DNA synthesis		Negative	Poginsky, 1988
Mutagenicity in Vivo			
TEST	SPECIES	RESULT	REFERENCE
Sister chromatid exchange	Rabbit	Negative	MacGregor, 1983
Micronucleus test	Mouse	Negative	Aeschbacher, 1982; MacGregor, 1983 Caria, 1995; Ngomuo, 1996
Micronucleus test	Mouse	Positive	Sahu, 1981
Micronucleus test	Rat	Negative	Utesch, 1998
Host-mediated assay		Negative	Aeschbacher, 1982

TABLE 1. QUERCETIN PRECLINICAL STUDIES

Acute To:	xicity				
SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/LD ₅₀	REF
Rat		Oral (Gavage	;)	>5,000 mg/kg bw	Covance,
Mouse		Oral (Gavage	2)	>16,000 mg/kg bw	unpublished Merck, unpublished
Mouse	Albino farm	Oral (Gavage	2)	160 mg/kg bw	Sullivan, 1951
Mouse		IP		4064 mg/kg	Merck, unpublished
Mouse		IP		3 g/kg	Ezaki, 1968
Mouse		IV		18 mg/kg	(RTECS) NIOSH (RTECS)
Rabbit		IV		100 mg/kg	FAO, 1969
Mouse	Albino farm	SC		98 mg/kg bw	(RTECS) Sullivan, 1951
Reproduct	tive Toxicity	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1			
SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	REF
Rat	S-D/Female (pregnant)	Oral	0, 2, 20, 200, 2000 mg/kg b days 6-15 of preg; or single day 9	w daily on Negative dose on	Willhite, 1982
Mouse	(C57xBALB/B)F 1 / Male	IP	0, 3.2, 6.4, 16, 32 mg/kg bw consecutive days (total dose 32, 80, 160 mg/kg)	y for 5 Paternal Effects (spermatogenesis; testes, epididymis, sperm duct)/ 16 mg/kg total dose	Rastogi, 1987
Developm	nental Toxicity				
SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAEL	DEC
Mouse	Swiss/Male	IP	0; 200, 300, 400 mg/kg Red bw in DMSO male	uction in fertility of untreated females paired with ss/200 mg/kg bw	Aravindakshan, 1985
Chronic T	oxicity				
SPECIES	STRAIN/SEX	ROUTE	DOSE/CONC.	RESULTS/NOAFI	DEE
Rat	Albino/MF	Oral (Diet)	0, 0.25, 0.5, 1%, 410 days	No effect/0.25%	Ambrose, 1952

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SPECIES	STRAIN/SEX	ROUTE	DOSE/CONCENTRATION	RESULTS/NOAEL	REF
Rat	F344/Female	Oral (Diet)	0; 1.25; 5.0% for 104 wk	Negative/1.25%	Ito, 1989
Rat	F344/Male	Oral (Diet)	0; 1.25; 5.0% for 104 wk	Negative/1.25%	Ito, 1989
Rat	F344/Male	Oral (Diet)	0; 1000; 10000; 40000 ppm for 104 wk	Kidney (renal tubule): adenoma	NTP, 1991
Rat	F344/Female	Oral (Diet)	0; 1000; 10000; 40000 ppm for 104 wk	Negative/1000	NTP, 1991
Rat	F344/Male	Oral (Diet)	0; 0.1; 0.2% for 64 wk	Negative	Stoewsand, 1984
Rat	F344/Female	Oral (Diet)	0; 0.1; 0.2% for 64 wk	Negative	Stoewsand, 1984
Rat	ACI	Oral (Diet)	0; 1.0; 5.0% for 540 days	Negative	Hirono, 1981
Rat	F344/Male	Oral (Diet)	0; 5% in diet for 4 weeks, followed by ± BHBN in diet for 29 weeks	Negative (only urinary bladder examined)	Hirose, 1983
Hamster	Non-inbred golden	Oral (Diet)	0; 10% for 735 days	Negative	Morino, 1982
Rat	Non-inbred albino	Oral (Diet)	0; 1% for 58 weeks	Intestinal (adenoma, fibro-adenoma, adenocarcinoma) Bladder (papillary, sessile transitional cell carcinoma)	Pamukcu, 1980
Mouse	Strain A	Oral (Diet)	0; 5% for 23 weeks	Negative (only lung tumor assessed)	Hosaka, 1981
Mouse	ddY M/F	Oral (Diet)	0: 2% for 842 days	Negative (high mortality)	Saito, 1980
Rat	Fischer 344	Oral (Diet)	0; 0.1% for 540 days	Negative	Takanashi, 1983
Mouse	ICR/Ha Swiss/Female	Topical	0; 25 mg in 0.1 ml DMSO to dorsal skin 3x/week for 368 days	No skin tumors induced	Van Duuren, 1976
Mouse	Albino Swiss/Female	Bladder implant	20 mg cholesterol pellets containing 4 mg quercetin for 175 days – 1 yr	No significant difference in incidence of bladder carcinoma	Wang, 1976

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Carcinogenicity

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