Glucosamine Hydrochloride

Handling/Processing

Identification of Petitioned Substance Chemical Name: D-glucosamine hydrochloride, 2-Amino-2-deoxy-CAS Number: D-glucose hydrochloride 66-84-2 **Other Names: Other Codes:** European Inventory of Existing Commercial Chemical Substances (EINECS) No. 200-638-1 **Trade Names:** REGENASURE® Glucosamine Hydrochloride **Characterization of Petitioned Substance**

Composition of the Substance:

Glucosamine hydrochloride is used as a dietary ingredient and/or a functional food ingredient. It is also listed in the International Nomenclature of Cosmetic Ingredients and may be used as an ingredient in cosmetic products. The molecular formula for glucosamine hydrochloride is C₆H₁₃NO₅ ClH and the molecular weight is 215.63 (U.S. EPA, Substance Registry Services).

Properties of the Substance:

Physical State	Crystalline
Color	Off-White
Melting Point	190 – 194° C
Specific Gravity	1.42 at 100° F
Water Solubility	Soluble
Incompatibility	Strong oxidizing agents
Stability	Stable under normal temperature and pressure

February 1, 2010

47	Specific Uses of the Substance:
48 49 50 51 52 53 54 55 56 57 58	Glucosamine is an amino monosaccharide that is an essential component of muco-polysaccharides and chitin. Glycosaminoglycans (muco-polysaccharides) are large complexes of negatively-charged carbohydrate chains that are incorporated into mucous secretions, connective tissue, skin, tendons, ligaments, and cartilage. Because glucosamine is a large component of joint tissue, the hypothesis that glucosamine supplements would provide symptomatic relief for osteoarthritis was developed more than 30 years ago (D'Ambrosio et al., 1981). Glucosamine supplements are widely used to relieve arthritic complaints (Houpt et al., 1999) and commercial products are on the market for this purpose. However, a study conducted looking at glucosamine supplementation as a means of cartilage preservation in patients with mild to moderate osteo-arthritis of the knee was negative. Glucosamine supplementation could possibly play a positive role in pain management of patients with osteo-arthritis, especially severe cases (HealthDay, 2009).
59 60 61	Approved Legal Uses of the Substance:
62 63 64	Glucosamine hydrochloride is not listed as Generally Recognized as Safe (GRAS) by the U.S. Food and Drug Administration (FDA).
65 66	Action of the Substance:
60 67 68 69 70 71 72	Glucosamine hydrochloride is used as a dietary ingredient and/or a functional food ingredient. It is also listed in the International Nomenclature of Cosmetic Ingredients and may be used as an ingredient in cosmetic products.
73	Status
74 75 76 77	<u>U.S. Food and Drug Administration:</u> Glucosamine hydrochloride is not listed as Generally Recognized as Safe (GRAS) by the FDA. Cargill, Inc.
78 79 80 81 82 83 84 85 86 87	submitted a notice on April 6, 2004 to the FDA that glucosamine hydrochloride is GRAS for use in select beverages as defined in 21 CFR 170.3(n)(3), (7), (16), (31), (36) at a maximum level of 0.75 grams per serving. The FDA received the notice on April 9, 2004 and assigned it as GRAS Notice No. GRN 000150. In a letter dated September 9, 2004, Cargill, Inc. asked that FDA cease to evaluation Cargill's notice in light of process related changes in the manufacture of glucosamine hydrochloride, with the understanding that Cargill may, in the future, submit another GRAS notification or make another appropriate submission for glucosamine chloride. The FDA ceased to evaluate glucosamine hydrochloride for GRAS status on September 9, 2004. U.S. Environmental Protection Agency:
79 80 81 82 83 84 85 86	submitted a notice on April 6, 2004 to the FDA that glucosamine hydrochloride is GRAS for use in select beverages as defined in 21 CFR 170.3(n)(3), (7), (16), (31), (36) at a maximum level of 0.75 grams per serving. The FDA received the notice on April 9, 2004 and assigned it as GRAS Notice No. GRN 000150. In a letter dated September 9, 2004, Cargill, Inc. asked that FDA cease to evaluation Cargill's notice in light of process related changes in the manufacture of glucosamine hydrochloride, with the understanding that Cargill may, in the future, submit another GRAS notification or make another appropriate submission for glucosamine chloride. The FDA ceased to evaluate glucosamine hydrochloride for GRAS status on September 9, 2004.

100 101	International:
102 103	Glucosamine hydrochloride is not allowed for use as a processing aid in organic food production by either the European Union (European Union, 2008) or Codex Alimentarius (Codex Alimentarius, 2008).
104 105 106 107 108	Glucosamine hydrochloride is included on the chemical inventory of the Domestic Substances List by the Canadian government.
109	Evaluation Questions for Substances to be used in Organic Handling
110 111 112 113	<u>Evaluation Question #1:</u> Is the petitioned substance formulated or manufactured by a chemical process? (From 7 U.S.C. § 6502 (21).)
114 115 116 117 118 119	Glucosamine hydrochloride is produced through a proprietary process that utilizes a non-genetically modified organism, <i>Aspergillus niger</i> , in a dextrose-based fermentation. After the fermentation, the glucosamine is isolated from the fungal biomass via acid hydrolysis. Subsequently, the glucosamine hydrochloride is filtered, crystallized, centrifuged, dried, and packaged for commercial use. More specific information is not available due to the proprietary nature of the manufacturing process.
120 121 122	<u>Evaluation Question #2:</u> Is the petitioned substance formulated or manufactured by a process that chemically changes the substance extracted from naturally occurring plant, animal, or mineral sources? (From 7 U.S.C. § 6502 (21).)
123 124 125 126 127	The glucosamine hydrochloride manufactured by the process described in the response to Evaluation Question 1 is slightly different chemically from glucosamine extracted from natural animal sources. The HCl moiety is added onto the synthesized glucosamine, due to the acid hydrolysis.
128 129 130	<u>Evaluation Question #3:</u> Is the petitioned substance created by naturally occurring biological processes? (From 7 U.S.C. § 6502 (21).)
131 132 133 134	Glucosamine is an amino monosaccharide that is an essential component of mucopolysaccharides and chitin. Glycosaminoglycans (mucopolusaccharides) are large complexes of negatively-charged carbohydrate chains that are incorporated into mucous secretions, connective tissue, skin, tendons, ligaments, and cartilage of animals and shellfish.
135 136 137 138	<u>Evaluation Question #4:</u> Is there a natural source of the petitioned substance? (From 7 CFR § 205.600 (b) (1).)
138 139 140	Glucosamine can be derived from shellfish waste.
141 142 143	<u>Evaluation Question #5:</u> Is there an organic agricultural product that could be substituted for the petitioned substance? (From 7 CFR § 205.600 (b) (1).)
144 145	There is not an organic agricultural product that can be substituted for glucosamine.
146 147 148	<u>Evaluation Question #6:</u> Are there adverse effects on the environment from the petitioned substance's manufacture, use, and disposal? (From 7 CFR § 205.600 (b) (2).)
149 150 151 152 153	The manufacturing process is confidential and so, little information is available. There is an acid hydrolysis step in the process and, therefore, the disposal of acidic waste may be an issue. The amount of waste to be disposed of is not known for each batch manufactured. Theoretically, the acidic waste could be neutralized, however, this may or may not be practical, depending on the amount of acidic waste produced.

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Evaluation Question #7: Does the petitioned substance have an adverse effect on human health as defined by applicable Federal regulations? (From 7 CFR § 205.600 (b) (3).)

157158 Acute Oral Toxicity

159 160 Oral administration of glucosamine at very large doses (5,000 to 15,000 mg/kg body weight) is well tolerated without documented toxicity. The LD₅₀ for glucosamine for rats, mice, and rabbits exceed 5,000 161 mg/kg with a median value of >8,000 mg/kg (data from seven studies as summarized by Anderson et al., 162 2005). Glaza (2002) administered 5,000 mg glucosamine/kg BW orally to five male and five female rats. 163 All animals were observed clinically, twice daily, for body weight changes, mortality, and morbidity. After 164 15 days, all animals were euthanized by over-exposure to carbon dioxide and subjected to macroscopic 165 166 necropsy examination. The necropsy included examination of the external surface of the carcass and all 167 organs and tissues in the thoracic, abdominal, pelvic, and oral cavities. No test material-related effects were observed. The acute oral LD₅₀ of glucosamine hydrochloride is greater than 5,000 mg/kg. 168

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170 Sub-chronic and Chronic Oral Toxicity

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Echard et al. (2001) examined the effects of oral administration of glucosamine hydrochloride compared to
a baseline diet in eight male spontaneously hypertensive rats and eight Sprague-Dawley rats for nine
weeks. In this study, they fed 0.5% w/w or ~300 mg/kg (which was estimated at 10 to 20 times the usual

human dose). It was concluded that there were no consistent effects on blood chemical parameters and

176 organ histology, suggesting no overall toxicity of glucosamine in this nine week study involving these two

strains of rats. In dietary studies cited by Setnikar et al., (1991b), rats ingested glucosamine sulfate at 2,700

mg/kg for 52 weeks and dogs ingested 2, 149 mg/kg for 26 weeks. There were no treatment-related
 adverse effects in either species.

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181 Toxicity by the Parenteral Route

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Setnikar et al., (1991a) investigated the effects of intravenous and intra-peritoneal administration in rats.
The LD₅₀ of glucosamine in rats for intra-peritoneal injection is ~5,247 mg/kg BW and for intravenous
injection is 1,674 mg/kg BW. For mice, the LD₅₀ of glucosamine for intra-peritoneal injection is 6,614

186 mg/kg BW while the LD_{50} for intravenous injection is >1,619 mg/kg BW.

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- 188 Mutagenicity
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190 Glucosamine was not mutagenic in the *E. coli* reverse mutation studies of Brusick et al., (1980). However.

- 191 Nanjou et al., (1984) found glucosamine to induce strand breakage in the DNA of bactiophage, which the
- 192 authors believed to be associated with the presence of an amino group.
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194 Effects of Glucosamine on Glucose Metabolism in Humans

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One of the main concerns is the effect of glucosamine on glucose metabolism and glucose homeostasis in humans. Anderson et al., (2005) concluded, from 32 clinical studies involving 3,073 subjects for an average

198 of 17 weeks, that glucosamine had no adverse effects on glucose homeostasis. Glucosamine appears to be

199 well-tolerated for periods up to three years. The usual dose of glucosamine was 1,500 mg/day in three

doses, however, up to 3,200 mg/day were well-tolerated by subjects. Anderson et. al., (2005) also

201 concluded from 13 clinical trials that glucosamine had no adverse effects on blood chemistries,

202 hematological parameters, urinalysis, occult blood in feces, or cardiovascular parameters.

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Therefore, based on the high LD_{50} calculated in the studies involving feeding glucosamine to rats, mice, and

rabbits and the long-term human studies, it appears glucosamine, when used in nutritional supplements,
 has no adverse long-term effects.

206 207 Glucosamine Hydrochloride

208 In crystalline form, glucosamine hydrochloride is severely irritating to the eyes, as well as, irritating to the 209 gastro-intestinal tract, respiratory system, and skin. Therefore, when handling glucosamine chloride in 210 crystalline form, respiratory protection (an approved respirator), eye protection (safety goggles), skin 211 protection (impervious clothing and gloves) should be used, in addition to following good housekeeping 212 procedures. 213 214 Evaluation Question #8: Is the nutritional quality of the food maintained when the petitioned substance is used? (From 7 CFR § 205.600 (b) (3).) 215 216 Glucosamine hydrochloride is used as a nutritional supplement to relieve joint pain and is not normally part of any 217 218 other foods to enhance handling/processing. The nutritional supplements containing glucosamine hydrochloride also 219 have as ingredients (but not limited to): water, high fructose corn syrup, assorted fruit juices, chondroitin sulfate, 220 preservatives, dyes, and flavors (both natural and artificial). 221 222 Evaluation Question #9: Is the petitioned substance to be used primarily as a preservative? (From 7 223 CFR § 205.600 (b) (4).) 224 225 Glucosamine hydrochloride is not used as a preservative. 226 227 Evaluation Question #10: Is the petitioned substance to be used primarily to recreate or improve 228 flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., 229 vitamin D in milk)? (From 7 CFR § 205.600 (b) (4).) 230 231 Glucosamine hydrochloride is not used to recreate or improve flavors, colors, textures, or nutritive values 232 lost in processing (except when required by law, e.g., vitamin D in milk). 233 234 Evaluation Question #11: Is the petitioned substance generally recognized as safe (GRAS) when used 235 according to FDA's good manufacturing practices? (From 7 CFR § 205.600 (b) (5).) 236 237 Glucosamine hydrochloride is not generally recognized as safe (GRAS) when used according to FDA's 238 good manufacturing practices. The FDA ceased its evaluation of glucosamine hydrochloride for GRAS 239 status on September 9, 2004. 240 241 Evaluation Question #12: Does the petitioned substance contain residues of heavy metals or other 242 contaminants in excess of FDA tolerances? (From 7 CFR § 205.600 (b) (5).)47 243 244 Glucosamine hydrochloride supplements do not contain residues of heavy metals or other contaminants in 245 excess of FDA tolerances. 246 247 References 248 249 Anderson, J.W., R.J. Nicolosi, and J.F. Borzelleca. 2005. Glucosamine effects in humans: a review of effects 250 on glucose metabolism, side effects, safety considerations, and efficacy. Food and Chemical Toxicology 43: 251 187-201. 252 253 Brusick, D.J., V.F. Simmons, H.S. Rosenkrantz, V.A. Ray, and R.S. Stafford. 1980. An evaluation of the 254 Escherichia coli WP2 and WP2 UVRA reverse mutation assay. Mutation Research 76: 169-190. 255 256 Codex Alimentarius. 2008. Guideline 32: Guidelines for the Production, Processing, Labelling, and 257 Marketing of Organically Produced Foods. 258 259 D'Ambrosio, E., B. Casa, R. Bompani, G. Scali, M. Scali. 1981. Glucosamine sulfate: a controlled clinical 260 investigation in arthrosis. Pharmacotherpeutica 2: 504-508. 261

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- 292 March 15, 2006. Accessed at: <u>http://www.cfsan.fda.gov/~dms/grasguid.html#Q1</u>
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