

Nicotine-Related Impurities in E-Cigarette Cartridges and Refill Formulations

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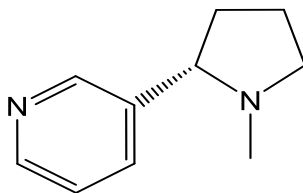
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Background

- The nicotine used in e-cigarette formulations is extracted from tobacco, and the purity of the nicotine can vary depending upon manufacturer and grade (e.g., US Pharmacopeia grade)
- The US and European Pharmacopeia make recommendations for the purity of nicotine intended for pharmaceutical products
- Recommendations are also made in the ICH Guidelines “Impurities in New Drug Products Q3B(R2)”*

Nicotine
3-[(2S)-1-methylpyrrolidin-2-yl]pyridine



*Q3B(R2): *International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use. Impurities in New Drug Products. International Conference on Harmonisation. 2006.*



Background

- No official purity recommendation for the nicotine used in e-cigarettes has been made
- Only a few publications have evaluated the nicotine-related impurities in e-cigarette formulations and none have evaluated these e-liquids during long-term storage

- Etter, J. F., Zather, E., Svensson, S., Analysis of refill liquids for electronic cigarettes. *Addiction* **2013**, 108 (9), 1671-1679.
- Trehy, M. L., Ye, W., Hadwiger, M. E., Moore, T. W. *et al.* Analysis of Electronic Cigarette Cartridges, Refill Solutions, and Smoke for Nicotine and Nicotine Related Impurities. *Journal of Liquid Chromatography & Related Technologies* **2011**, 34 (14), 1442-1459.
- Westenberger, B., Evaluation of e-cigarettes. Washington, DC: US Food and Drug Administration, **2009**.
- Westenberger, B., Evaluation of Johnson Creek Liquids for E-cigarette Fills. Washington, DC: US Food and Drug Administration, **2009**.
- Flora J.W., Meruva N., Huang C.B, Wilkinson C.T., Ballentine R., Smith D.C. , Werley M.S., McKinney W.J, Characterization of potential impurities and degradation products in electronic cigarette formulations and aerosols, *Regul. Toxicol. Pharmacol.* **2016**, 74, 1-11.

Background

- FDA recommends a list of constituents to be measured in e-vapor products and e-liquids
- “FDA also recommends that you include a complete list of uniquely identified constituents, including those listed below, as appropriate for your product, and other toxic chemicals contained within the product or delivered by the product, such as a reaction product from leaching or **aging** and aerosol generated through the heating of the product.”*

Premarket Tobacco Product Applications for Electronic Nicotine Delivery Systems

Guidance for Industry

DRAFT GUIDANCE

Comments may be submitted within 60 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Electronic comments may be submitted to <http://www.regulations.gov>. Alternatively, submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Room 1061, Rockville, MD 20852. All comments should be identified with Docket No. FDA-2015-D-2496.

For questions regarding this draft guidance, contact the Center for Tobacco Products at (Tel) 1-877-CTP-1373 (1-877-287-1373) Monday-Friday, 9 a.m. – 4 p.m. EDT.

Additional copies are available online at <http://www.fda.gov/TobaccoProducts/Labeling/Regulations/Guidance/default.htm>. You may send an e-mail request to SmallBizTobacco@fda.hhs.gov to receive an electronic copy of this guidance. You may send a request for hard copies to U.S. Food and Drug Administration, Center for Tobacco Products, Attn: Office of Small Business Assistance, Document Control Center, Bldg. 71, Rm. G335, 10903 New Hampshire Ave., Silver Spring, MD 20993-2000.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Tobacco Products

May 2016

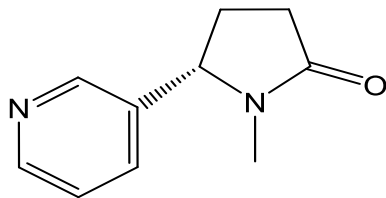
*Premarket Tobacco Product Applications for Electronic Nicotine Delivery Systems Guidance for Industry – Draft – CTP-FDA - 2016

Objectives

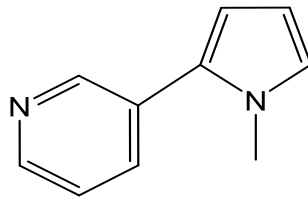
- To develop a sensitive, selective, and robust analytical method (LC-MS) for the quantitation of nicotine-related impurities and degradation products in e-vapor products
- To evaluate these impurities in a variety of commercial e-cigarette cartridges and refill solutions (e-liquids).
- To quantify changes in these impurities during long-term storage of commercial e-cigarettes
- To apply this method to estimate the transfer efficiency of the nicotine-related impurities to the aerosol

Specified Nicotine Impurities from European Pharmacopoeia (monograph 1452)

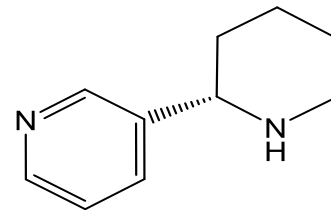
Cotinine
(5S)-1-methyl-5-(pyridin-3-yl)pyrrolidin-2-one



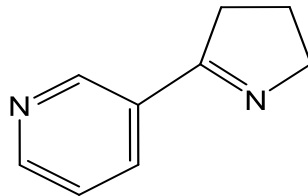
Beta-Nicotyrine
3-(1-methyl-1H-pyrrol-2-yl)pyridine



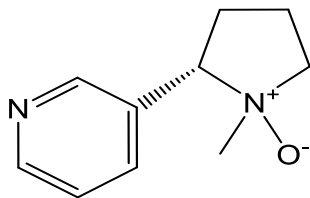
Anabasine
3-[(2S)-piperidin-2-yl]pyridine



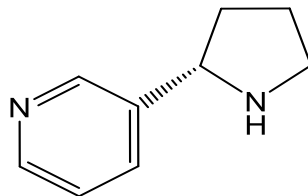
Myosmine
3-(4,5-dihydro-3H-pyrrol-2-yl)pyridine



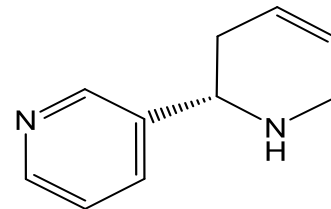
Nicotine-N'-Oxides
(1RS,2S)-1-methyl-2-(pyridin-3-yl)pyrrolidine 1-oxide (epimer at N+)



Nornicotine
3-[(2S)-pyrrolidin-2-yl]pyridine



Anatabine
(2S)-1,2,3,6-tetrahydro-2,3'-bipyridyl



Analytical Methodologies

Analyte	Analytical Platform
Nicotine	GC-FID
Nicotine-Related Impurities	LC-MS/MS

GC-FID = Gas Chromatograph with Flame Ionization Detector

LC-MS = Liquid Chromatography with Mass Spectrometry

- Formulations from disposable e-cigarette cartridges were removed by centrifugation at 4800 rpm for 30 seconds
- Sealed tank models were disassembled and formulation was removed
- Refill e-liquids were pipetted directly for analysis
- Method validations were conducted consistent with ICH guidelines “Validation of Analytical Procedures: Test and Methodology Q2(R1)”*

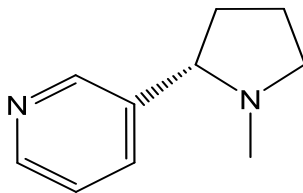
*Q2(R1): *International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use. Validation of Analytical Procedures. International Conference on Harmonisation. 2005.*



Nicotine Method

- For all samples, formulations were diluted in *n*-propanol containing quinoline as the internal standard
- All data were collected on either an Agilent 7890 or 6890 GC with FID detection
- The analytical column used was a DB-ALC1 fused silica capillary column, 30 m × 0.320 mm ID, 1.8 μm film thickness (Agilent Technologies), and the carrier gas was helium

Nicotine
3-[(2S)-1-methylpyrrolidin-2-yl]pyridine



Nicotine-Related Impurities Method

- For all samples, formulation was diluted in 70/30 methanol/water containing deuterium labeled internal standards
- Chromatography - Waters ACQUITY UPLC with X-Bridge C18 (2.5um) 2.1 x 50 mm column
- Mobile phase A is 10 mM ammonium acetate (pH 10) and mobile phase B is optima grade methanol (gradient run)
- MS detection using Multiple Reaction Monitoring (MRM)

Analyte	Internal Standard
Myosmine	Myosmine-d4
Nornicotine	Nornicotine-d4
β -nicotyrine	Myosmine-d4
Anatabine	Myosmine-d4
Anabasine	Anabasine-d4
Cotinine	Cotinine-d3
Nicotine-N-oxide	Cotinine-d3

Commercial Refill E-Liquids Tested (Jan 2016)

product code	type	percent nicotine by weight	production date	"expiration", "sell by", or "do not use after" Date	Package
1	refill e-liquid	1.2	-	-	glass bottle with plastic overwrap
2	refill e-liquid	1.2	-	-	glass bottle with plastic overwrap
3	refill e-liquid	1.2	-	5/19/2016	plastic bottle with plastic overwrap
4	refill e-liquid	1.2	-	5/15/2016	plastic bottle with plastic overwrap
5	refill e-liquid	1.2	-	6/23/2016	glass bottle
6	refill e-liquid	1.2	-	10/8/2016	glass bottle
7	refill e-liquid	1.2	-	-	glass bottle with plastic overwrap
8	refill e-liquid	1.2	-	-	glass bottle with plastic overwrap
9	refill e-liquid	1.6	8/1/2014	8/1/2016	plastic bottle with plastic overwrap
10	refill e-liquid	1.6	-	5/23/2015	plastic bottle with plastic overwrap

- Limited production and shelf life data provided from manufacturers
- Variety of packaging configurations and product ages

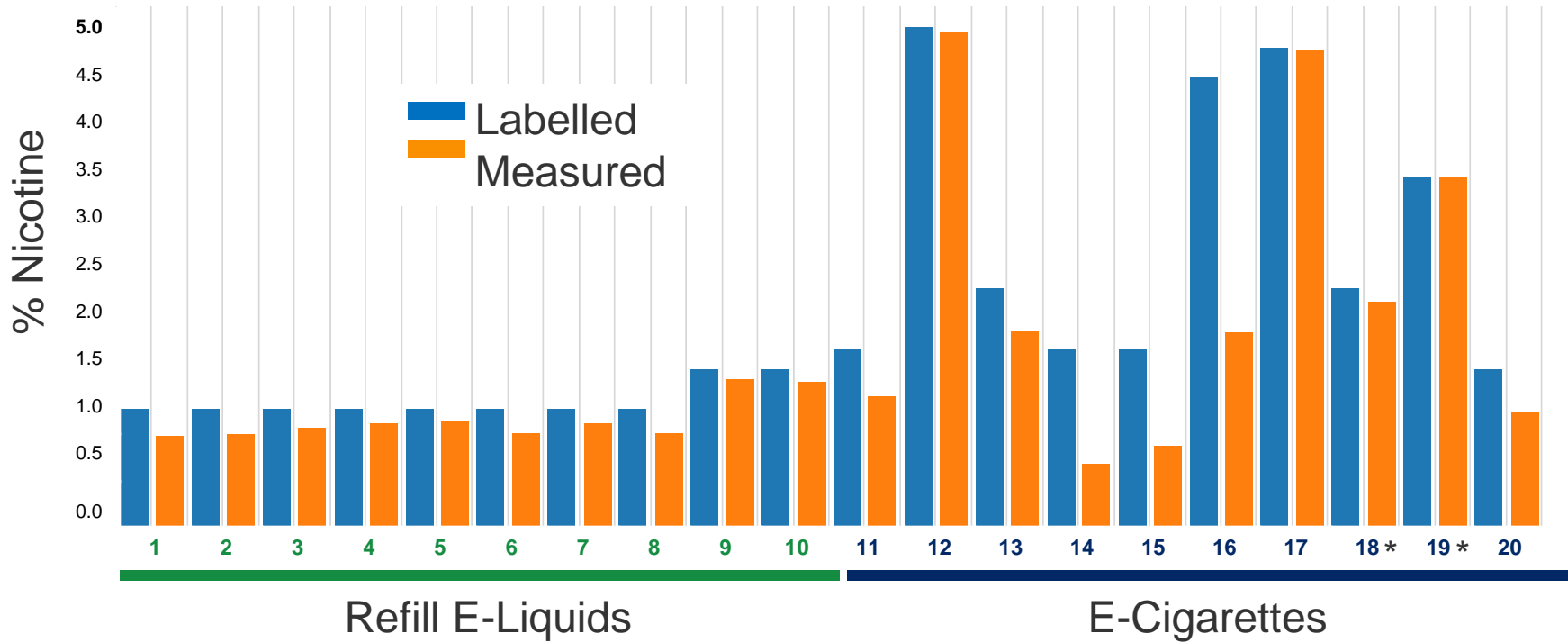


Commercial E-Cigarettes Tested (Jan 2016)

product code	type	percent nicotine by weight	production date	"expiration", "sell by", or "do not use after" Date	Package
11	disposable prefilled tank	1.8	12/3/2014	12/3/2015	blister pack with rubber mouthpiece cover
12	disposable prefilled tank	5.0	-	-	blister pack with plastic backing
13	disposable prefilled tank	2.4	-	12/18/2016	plastic box with rubber or plastic endcaps
14	disposable device	1.8	-	2/10/2013	plastic box with rubber or plastic endcaps
15	disposable device	1.8	-	2/10/2013	plastic box with rubber or plastic endcaps
16	disposable device	4.5	-	-	Plastic box with plastic overwrap
17	disposable cartridge	4.8	-	-	blister pack with foil backing
18	disposable cartridge	2.4	-	8/1/2016	blister pack with foil backing
19	disposable cartridge	3.5	-	5/9/2016	blister pack with foil backing
20	disposable cartridge	1.6	-	-	plastic overwrap, blister with foil backing

- Limited production and shelf life data provided from manufacturers
- Variety of packaging configurations and product ages

Nicotine Level: Labelled vs. Measured

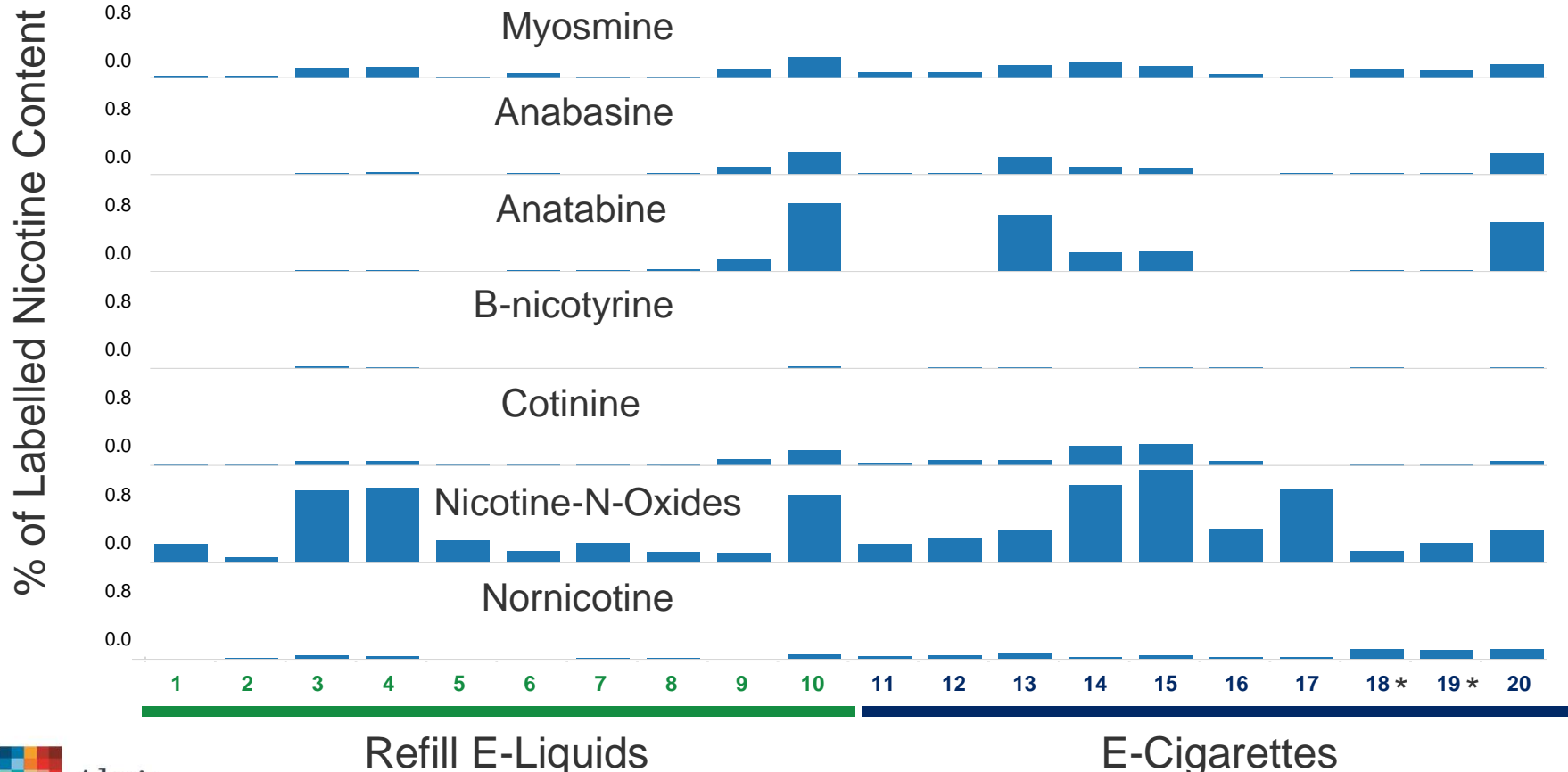


*18 and 19 are MarkTen® e-cigarettes manufactured by NuMark LLC

Nicotine Level: Labelled vs. Measured

- 6 products contained nicotine between 90 and 100% of label claim
 - 4 had shelf life information
 - 1 was expired
- 11 products contained nicotine between 70 and 90% of the label claim
 - 6 had shelf life information
 - 1 was expired
- 3 products contained nicotine less than 50% of the nicotine label claim
 - 2 had shelf life information
 - 2 were expired

Nicotine-Related Impurities



Nicotine-Related Impurities

- Myosmine, anabasine, β -nicotyrine, cotinine, and nornicotine, all had values below 0.2% of the labelled nicotine content where many were well below 0.1%
- Products 10, 13, and 20 had relatively high average anatabine levels at 0.57, 0.47, and 0.41%
- 6 of the 20 products contained nicotine-N-oxide levels greater than 0.5% of the labelled nicotine content
 - 3 were expired
 - 2 were within labelled shelf life
 - 1 had no shelf life information



Nicotine-Related Impurities During Shelf-life

- To quantify changes in these impurities during long-term storage of commercial e-cigarettes
- MarkTen® XL e-cigarettes manufactured by NuMark LLC were evaluated during long-term storage (Classic and Menthol)

Storage Description	Storage Conditions
Long-term (Q1A(R2))*	25 ⁰ C ± 2 ⁰ C / 60% RH ± 5%

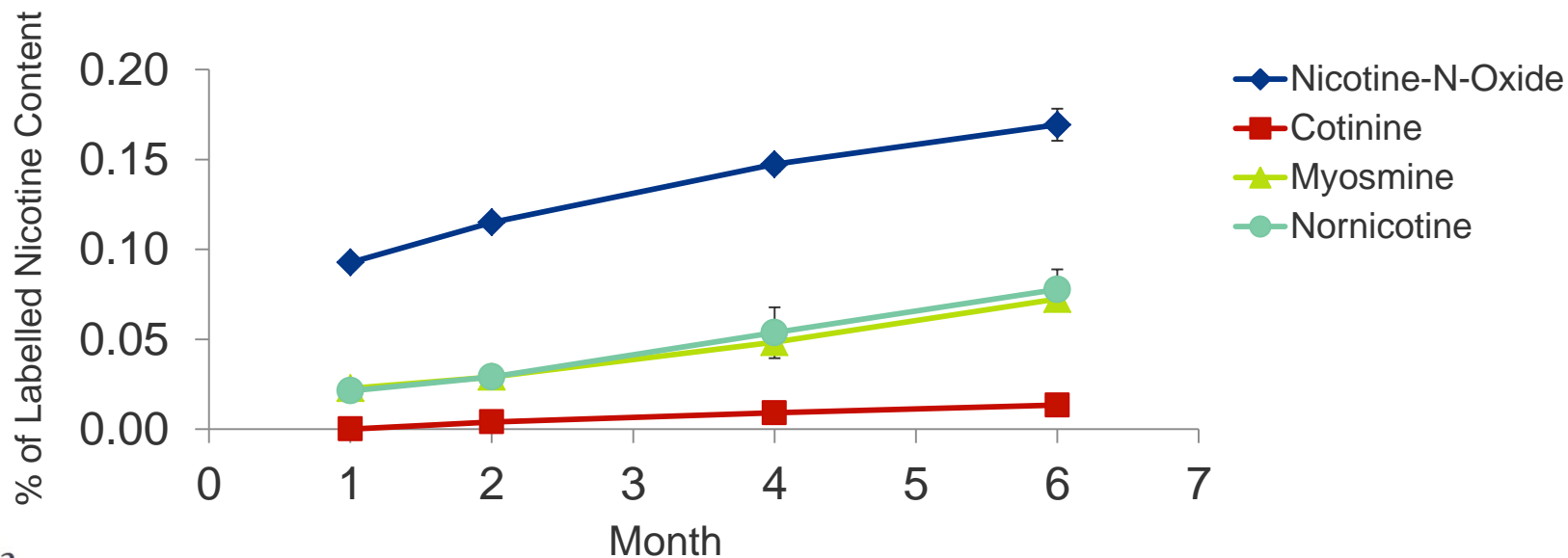
- Tested at 1, 2, 4 and 6 months



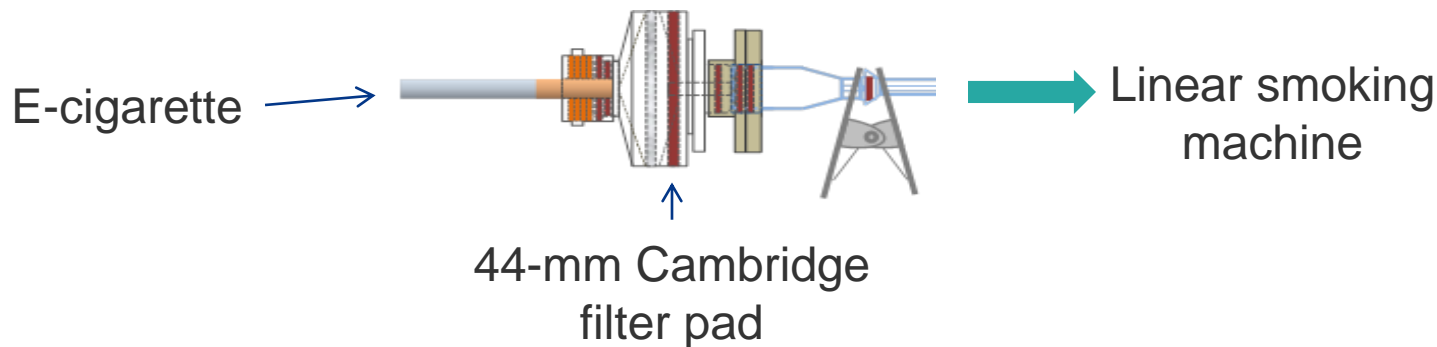
* ICH Guidance for Industry Q1A(R2) Stability Testing of New Drug Substances and Products

Nicotine-Related Impurities During Shelf-life

- All specified impurities are <0.2% of the total nicotine concentration after 6 months at long-term conditions
- No measurable increase was observed for anabasine, β -nicotyryne, and anatabine



Nicotine-Related Impurities: Estimated Transfer Efficiency



- Estimate the % transfer efficiency to the aerosol (n=6)

Transfer % in aerosol	Myosmine	Nornicotine	Cotinine	Anabasine	Nicotine-N-Oxide	Anatabine	B-nicotyrine
MarkTen® Classic	97	95	103	80	5.4	89	141
MarkTen® Menthol	97	110	103	91	4.9	96	164

Non-validated method

- GC-MS analysis of nicotine-N-oxides showed primary thermal decomposition pathways were to nicotine and β -nicotyrine

Conclusions

- Shelf-life information on e-cigarettes and refill e-liquids should be established through rigorous stability testing measuring a variety of constituents appropriate for the products
- This selective and sensitive method is suitable to provide quantitative data for risk assessment analysis and for use in e-vapor product and refill solution stability studies as one of the stability indicating measures
- Nicotine-N-oxide, nornicotine, mysomine, and cotinine have been observed to increase with respect to time during stability studies*
- Transfer efficiency of nicotine-N-oxide is low (<10%) due to thermal degradation during the aerosol formation process

* ICH Guidance for Industry Q1A(R2) Stability Testing of New Drug Substances and Products

Acknowledgements:

*Celeste Wilkinson, Kathleen M. Sink,
Diana L. McKinney, John H. Miller,
Chris McFarlane, George Karles*



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