

Method Comparisons for Particle Size Distributions and Nicotine Dissolution Profiles in Smokeless Tobacco Products

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Particle Size & Dissolution in FDA Regulation

Pharmaceutical Industry

- Particle size assessment and dissolution testing are recommended by FDA/CDER
- Generally recognized relationship between surface area and exposure to/release of "active" ingredient



Tobacco Industry

- Based on pharma, FDA/CTP has hypothesized similar relationships exist for smokeless tobacco products (STPs)
- Currently, there is no empirical evidence in the scientific literature to support this hypothesis
- The nature of tobacco products, manner of use for STPs, and no claim of an "active" ingredient are strikingly dissimilar from pharmaceuticals



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National/International Methods for Particle Size Assessment







Common Particle Size Assessment Methods



Laser Diffraction/Light Scattering

- Matrix challenges
- Distributions assessed typically assuming spherical particle shape



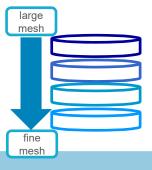
Sedimentation

- Matrix challenges
- Assumes spherical particle shape



Microscopy

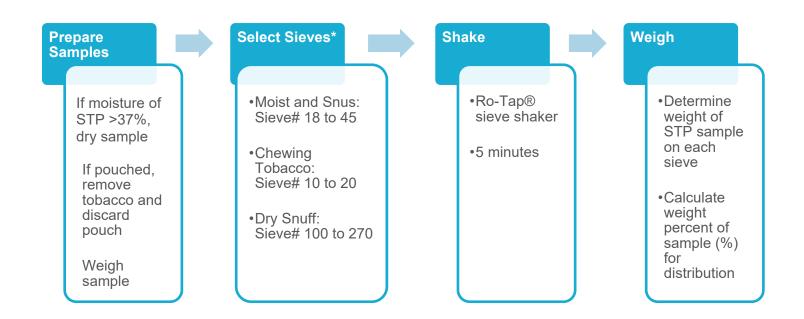
- Representative sample challenges
- Distributions assessed typically assuming spherical or regular particle shape



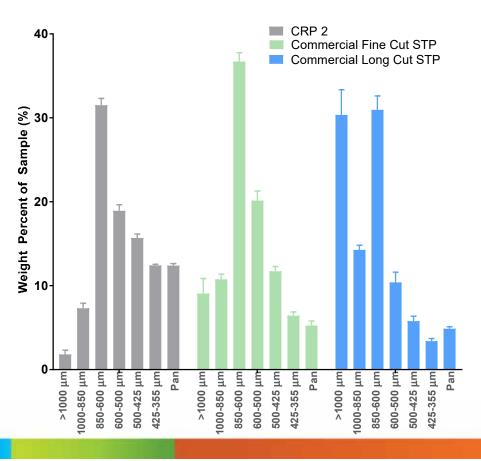
Sieving

- Orientation through the screen
- Blinding

STP Particle Size Sieve Analysis Method



Moist Snuff Product Particle Size Distributions



- Fine cut, long cut designation typically a tactile description
- Commercial Fine Cut STP distribution similar to CRP2
- Commercial Long Cut STP weight percent of sample shifted to the >1 mm particle size compared to Commercial Fine Cut STP

Comparing Particle Size Distributions

- K-S (Kolmogorov-Smirnov) two-sample test
- p-Value <0.05 indicates distributions are significantly different

Distributions Compared	p-Value
Commercial Fine Cut STP to Commercial Long Cut STP	<0.0001

National/International Methods for Dissolution





Dissolution Apparatus for Determining Release Rates of Constituents



App 1 – Basket

- Suitable for most STPs
- Sample contained
- Basket rotation necessary for STPs



App 2 - Paddle

More challenging for STPs



App 3 – Reciprocating Cylinder

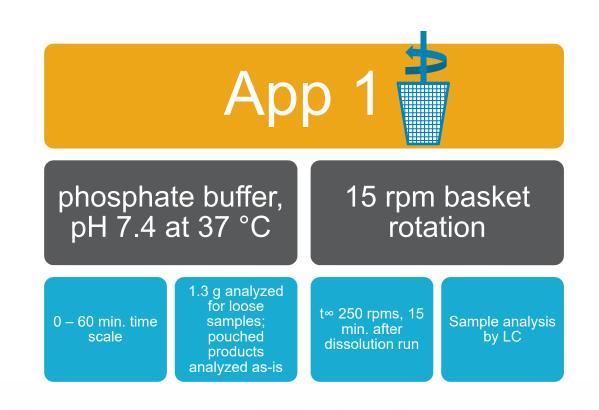
- Suitable for most STPs
- Sample contained
- Does not mimic Adult Tobacco Consumer use of STPs



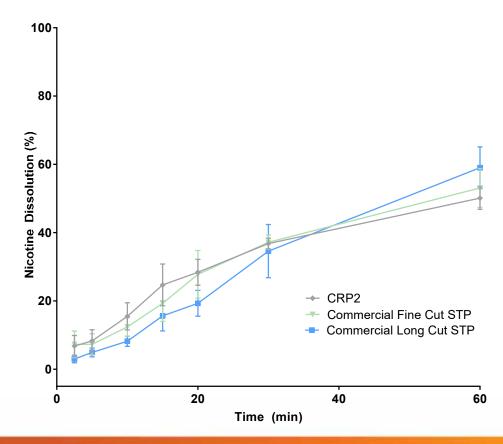
App 4 – Flow-Through Cell

- Suitable for most STPs
- Sample contained

STP Nicotine Dissolution Method



Moist Snuff Product Dissolution



Comparing Dissolution Profiles

Similarity factor (f_2) : > 50 indicates "sameness"

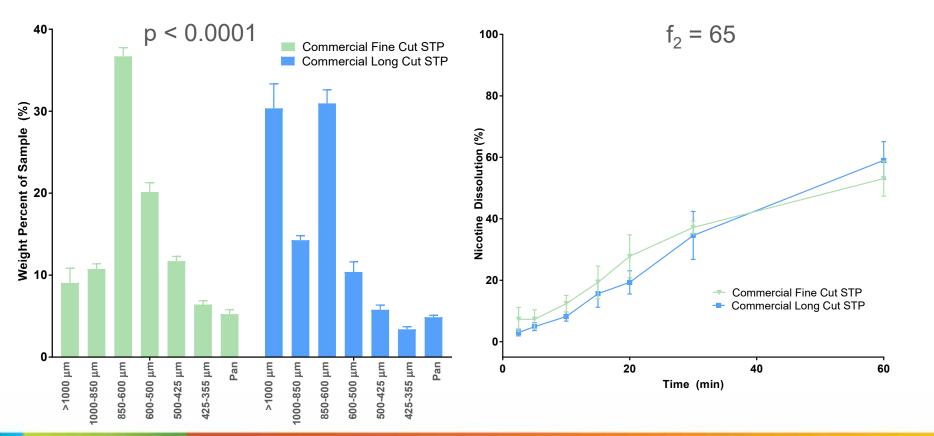
$$f_2 = 50 \times \log \left[\frac{100}{\sqrt{1 + \frac{\sum_{t=1}^{n} (R_t - T_t)^2}{n}}} \right]$$

 R_t = dissolution for Product 1 at time t T_t = dissolution for Product 2 at time t n = number of time points for which dissolution was assessed

Distributions Compared	f ₂ Value
Commercial Fine Cut STP to Commercial Long Cut STP	65

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Particle Size & Dissolution for Commercial STPs



Conclusions

- Fundamental approaches for comparing particle size distributions, and for dissolution profiles can be applied to evaluate smokeless tobacco products
- Method development requires specific considerations for smokeless tobacco products
 - Particle size
 - matrix effects
 - irregular particle shape
 - non-uniform and no "active" ingredient claim for assessment
 - Dissolution
 - samples do not disintegrate
 - numerous "ingredients" (i.e., tobacco constituents), but no "active" ingredient claim
- In these data presented, no differences were observed in nicotine release rate for products with statistically significantly different particle size distributions

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