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**Evaluation Report on the Analytical Methods submitted  
in connection with the Application for Authorisation of a  
Feed Additive according to Regulation (EC) No 1831/2003**

**L-lysine sulphate produced by fermentation with *Corynebacterium  
glutamicum* CGMCC 23982  
(FEED-2023-19630; CRL/230058)**





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in connection with the Application for Authorisation of a  
Feed Additive according to Regulation (EC) No 1831/2003**

Dossier related to: **FEED-2023-19630 - CRL/230058**

Name of Product: ***L-lysine sulphate produced by  
fermentation with *Corynebacterium  
glutamicum* CGMCC 23982***

Active Agent (s): **L-lysine**

Rapporteur Laboratory: **European Union Reference Laboratory for  
Feed Additives (EURL-FA)  
JRC Geel, Belgium**

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Date: **15/05/2024**

Report approved by: **Ursula Vincent**  
Date: **16/05/2024**

## EXECUTIVE SUMMARY

In the current application an authorisation is sought under Article 4(1) for *L-lysine sulphate produced by fermentation with Corynebacterium glutamicum* CGMCC 23982, under the category/functional group 3(c) 'nutritional additives'/amino acids, their salts and analogues', according to Annex I of Regulation (EC) No 1831/2003. The authorisation is sought for all animal species.

According to the Applicant, the *feed additive* contains an average *L-lysine* content of 54.4 % (w/w, based on dry matter).

*L-lysine sulphate* is intended to be added to feed through *premixtures* or directly into *compound feed* and *water*. However, the Applicant did not propose a minimum or maximum *L-lysine* content in *compound feed* or *water*.

For the identification of the sulphate ions in the *feed additive (L-lysine sulphate)* the EURL recommends for official control the European Pharmacopoeia monograph 20301.

For the determination of *lysine* in the *feed additive* and *premixtures* the Applicant submitted the ring-trial validated method EN ISO 17180 dedicated for the determination of free *lysine*, methionine and threonine in commercial amino acid products and *premixtures* containing more than 10 % of the amino acid. The method does not distinguish between the salts of amino acids and cannot differentiate between enantiomers. The method is listed in Commission Regulation (EC) No 152/2009, as last amended by Commission Implementing Regulation (EU) 2024/771.

The following performance characteristics are reported in the EN ISO 17180 method for the determination of *lysine*: a relative standard deviation for *repeatability* (RSD<sub>r</sub>) ranging from 0.7 to 1.7 % and a relative standard deviation for *reproducibility* (RSD<sub>R</sub>) ranging from 1.5 to 2.5 %.

Based on the performance characteristics available, the EURL recommends for official control the EN ISO 17180 method for the determination of free *lysine* in the *feed additive* and *premixtures*.

For the determination of *lysine* in *premixtures* and *compound feed* the Applicant submitted the ring-trial validated European Union (EU) method, based on ion-exchange chromatography (IEC) coupled to post-column derivatisation and optical (VIS) detection, which is described in Regulation (EC) No 152/2009. The method is designed for the determination of *free* (synthetic and natural) and of *total* (peptide-bound and free) amino acids in *premixtures* and *compound feed* and it does not distinguish between the salts of amino acids and cannot differentiate between enantiomers.

The EU method was initially ring-trial validated using four different matrices resulting in the equivalent EN ISO 13903 method, which is listed in the above mentioned Regulation.

The following combined performance characteristics were reported for the determination of *lysine* in animal feedingstuffs: RSD<sub>F</sub> ranging from 2.1 to 3.5 % and RSD<sub>R</sub> ranging from 3.0 to 13.1 %. Furthermore, the following limits of quantification (LOQ) were reported for free and total *lysine*: 0.035 and 0.3 g/kg feedingstuffs, respectively.

Based on the performance characteristics available, the EURL recommends for official control the ring-trial validated European Union (EU) method or the equivalent EN ISO 13903 method based on IEC-VIS to determine *lysine* in *premixtures* and *compound feed*.

For the determination of *lysine* in *water* the Applicant did not propose any method. However, in the frame of the stability studies, the Applicant applied the above-mentioned EU method based on IEC-VIS and demonstrated its applicability for the determination of *lysine* in *water*. Hence, the EURL recommends for official control the EU method based on IEC-VIS for the determination of *lysine* in *water*.

Further testing or validation of the methods to be performed through the consortium of National Reference Laboratories as specified by Article 10 (Commission Regulation (EC) No 378/2005, as last amended by Regulation (EU) 2015/1761) is not considered necessary.

## KEYWORDS

*L-lysine produced by fermentation with Corynebacterium glutamicum* CGMCC 23982, nutritional additives, amino acids, all animal species.

## 1. BACKGROUND

In the current application an authorisation is sought under Article 4(1) (new feed additive) for *L-lysine sulphate produced by fermentation with Corynebacterium glutamicum* CGMCC 23982, under the category/functional group 3(c) 'nutritional additives'/amino acids, their salts and analogues', according to Annex I of Regulation (EC) No 1831/2003. The authorisation is sought for all animal species [1,2]. *L-lysine sulphate produced by fermentation* using other *Corynebacterium glutamicum* strains is already authorised as nutritional *feed additive* for all animal species under several Commission Implementing Regulations [3-8].

According to the Applicant, the *feed additive* contains an average *L-lysine* content of 54.4 % (w/w, based on dry matter) [9].

The *L-lysine* is produced by fermentation with a non-genetically modified strain of *Corynebacterium glutamicum* which is deposited in the “China General Microbiological Culture Collection Center (CGMCC)” [10].

*L-lysine sulphate* is intended to be added to feed through *premixtures* or directly into *compound feed* and *water*. However, the Applicant did not propose a minimum or maximum *L-lysine* content in *compound feed* or *water* [11].

Note: The EURL has previously evaluated the analytical methods for the determination of *lysine* in the frame of several recent dossiers [12].

## 2. TERMS OF REFERENCE

In accordance with Article 5 of Regulation (EC) No 378/2005, as last amended by Regulation (EU) 2015/1761, on detailed rules for the implementation of Regulation (EC) No 1831/2003 of the European Parliament and of the Council as regards the duties and the tasks of the European Union Reference Laboratory concerning applications for authorisations of feed additives, the EURL is requested to submit a full evaluation report to the European Food Safety Authority for each application or group of applications. For this particular dossier, the methods of analysis submitted in connection with *L-lysine sulphate produced by fermentation with Corynebacterium glutamicum* CGMCC 23982 and their suitability to be used for official controls in the frame of the authorisation were evaluated.

## 3. EVALUATION

***Description of the analytical methods for the determination of the active substance in the feed additive, premixtures, feedingstuffs and when appropriate water (section 2.6.1 of the dossier - Annex II of Commission Regulation (EC) No 429/2008)***

For the determination of *lysine* in the *feed additive* and *premixtures* the Applicant proposed [13] and submitted the ring-trial validated method EN ISO 17180 dedicated for the determination of free *lysine*, methionine and threonine in commercial amino acid products and *premixtures* containing more than 10 % of the amino acid [14]. The method does not distinguish between the salts of amino acids and cannot differentiate between enantiomers. The method is listed in Commission Regulation (EC) No 152/2009 [15], as last amended by Commission Implementing Regulation (EU) 2024/771 [16].

Free *lysine* is extracted with diluted hydrochloric acid and further diluted with sodium citrate buffer. After addition of norleucine as internal standard, the amino acids are separated by ion-exchange chromatography (IEC). The *lysine* is determined either after post-column derivatisation with ninhydrine and optical detection: (VIS) detection at 440 nm and 570 nm or

by fluorescence detection (FLD) after post-column reaction with ortho-phthaldialdehyde with a detector excitation wavelength at 330 nm and emission at 460 nm [14].

The performance characteristics reported for the determination of free *lysine* in commercial amino acid products and *premixtures* when using the EN ISO 17180 method are listed in Table 1.

Based on the performance characteristics available, the EURL recommends for official control the EN ISO 17180 method for the determination of free *lysine* in the *feed additive* and *premixtures*.

For the determination of *lysine* in *premixtures* and *compound feed* the Applicant proposed [13] and submitted the ring-trial validated European Union (EU) method, based on ion-exchange chromatography (IEC) coupled to post-column derivatisation and optical (VIS) detection, which is described in the Annex III, E of Regulation (EC) No 152/2009 [15]. The method is designed for the determination of *free* (synthetic and natural) and of *total* (peptide-bound and free) amino acids in *premixtures* and *compound feed* and it does not distinguish between the salts of amino acids and cannot differentiate between enantiomers.

The *free* amino acids are extracted with diluted hydrochloric acid. Co-extracted nitrogenous macromolecules are precipitated with sulfosalicylic acid and removed by filtration. The solution is filtered and adjusted to pH 2.2. The amino acids are separated by IEC and determined by post-column derivatisation with ninhydrin and optical detection at 570 nm. The procedure chosen for the determination of the *total* amino acids depends on the amino acids under investigation. *Lysine* can be determined in either oxidised or non-oxidised samples. Oxidation is performed at 0 °C with a performic acid/phenol mixture. The excess of oxidation reagent is decomposed with sodium disulfite. The oxidised or non-oxidised sample is hydrolysed with hydrochloric acid (6 mol/L) for 23 h. The hydrolysate is adjusted to pH 2.2. The amino acids are separated by IEC and determined by post-column derivatisation with ninhydrin and optical detection at 570 nm [15,16].

The EU method was initially ring-trial validated using four different matrices. This method was further ring-trial validated by 23 laboratories, resulting in the equivalent EN ISO 13903 method [17], which is listed in the Regulation (EC) No 152/2009 [15].

The performance characteristics reported for the determination of *lysine* in different animal feedingstuffs when using the EU method (or equivalent EN ISO 13903 method [17]) are listed in Table 1. Furthermore, the following limits of quantification (LOQ) were reported for free and total *lysine*: 0.035 and 0.3 g/kg feedingstuffs, respectively [17].

**Table 1:** Method performance characteristics obtained in the frame of ring-trial validation studies (EN ISO 17180 [14], EU method [15,16] and EN ISO 13903 [17]) for the determination of *lysine* in feedingstuffs.

Ring-Trial	Matrix	<i>Lysine</i> content, g/kg	RSD <sub>r</sub> , %	RSD <sub>R</sub> , %
[14]	Feed Additive	459	0.8	2.3
	Premix 3	208	1.3	2.5
	Premix 4	168	1.3	2.3
	Premix 5	128	0.7	1.9
	Premix 6	123	1.7	2.1
	Premix 7	104	1.2	1.8
	Premix 8	102	1.2	1.5
	Premix 9	240	1.1	2.2
	Premix 10	233	0.8	1.8
	L-Lysine-HCl	760	0.9	1.8
[15-17]	Mixed pig feed	9.6	2.8	3.2
	Broiler compound	13.9	2.1	5.4
	Protein concentrate	47.7	2.4	3.0
	Premix	98.0	2.1	6.7
[17]	Poultry meal	36.3	3.1	9.9
	Broiler finisher feed	10.7	3.5	9.0
	Broiler starter feed	13.5	2.4	9.0
	Corn	2.6	3.1	13.1
	Fishmeal	42.2	2.8	7.9

RSD<sub>r</sub>, RSD<sub>R</sub> - relative standard deviation for *repeatability* and *reproducibility*, respectively.

Based on the performance characteristics available, the EURL recommends for official control the ring-trial validated European Union (EU) method or equivalent EN ISO 13903 method based on IEC-VIS to determine *lysine* in *premixtures* and *compound feed*.

For the determination of *lysine* in *water* the Applicant did not propose any method [13]. However, in the frame of the stability studies [18], the Applicant applied the above-mentioned EU method based on IEC-VIS and demonstrated its applicability for the determination of *lysine* in *water*. Hence, the EURL recommends for official control the EU method based on IEC-VIS for the determination of *lysine* in *water*.

***Methods of analysis for the determination of the residues of the additive in food (section 2.6.2 of the dossier - Annex II of Commission Regulation (EC) No 429/2008)***

An evaluation of corresponding methods of analysis is not relevant for the present application.

***Identification/Characterisation of the feed additive (section 2.6.3 of the dossier - Annex II of Commission Regulation (EC) No 429/2008)***

For the identification of *L-lysine sulphate* in the *feed additive* a specific method is not available. However, the EURL is aware of the generic European Pharmacopoeia



monograph 20301 for the identification of the sulphate ions [19]. Therefore, the EURL recommends for official control the European Pharmacopoeia monograph for the identification of the sulphate ions in the *feed additive*.

Further testing or validation of the methods to be performed through the consortium of National Reference Laboratories as specified by Article 10 (Commission Regulation (EC) No 378/2005, as last amended by Regulation (EU) 2015/1761) is not considered necessary.

#### 4. CONCLUSIONS AND RECOMMENDATIONS

In the frame of this authorisation the EURL recommends for official control: (i) the European Pharmacopoeia monograph 20301 for the identification of the sulphate ions in the *feed additive (L-lysine sulphate)*; (ii) the ring-trial validated method EN ISO 17180 based on ion-exchange chromatography coupled to optical detection (IEC-VIS/FLD) to determine *lysine* in the *feed additive* and *premixtures*; (iii) the ring-trial validated European Union (EU) method or equivalent EN ISO 13903 method based on ion-exchange chromatography coupled to optical detection (IEC-VIS) for the determination of *lysine* in *premixtures* and *compound feed*; and (iv) the EU method based on IEC-VIS for the determination of *lysine* in *water*.

##### ***Recommended text for the register entry (analytical method)***

For the identification of sulphate in the *feed additive (L-lysine sulphate)*:

- European Pharmacopoeia monograph 20301

For the determination of *lysine* in the *feed additive*:

- Ion-exchange chromatography coupled to post-column derivatisation and optical detection (IEC-VIS/FLD) – EN ISO 17180

For the determination of *lysine* in *premixtures*:

- Ion-exchange chromatography coupled to post-column derivatisation and optical detection (IEC-VIS/FLD) – EN ISO 17180 or
- Ion-exchange chromatography coupled to post-column derivatisation and optical detection (IEC-VIS) – Commission Regulation (EC) 152/2009

For the determination of *lysine* in *compound feed*:

- Ion-exchange chromatography coupled to post-column derivatisation and optical detection (IEC-VIS) – Commission Regulation (EC) 152/2009

For the determination of *lysine* in *water*:

- Ion-exchange chromatography coupled to post-column derivatisation and optical detection (IEC-VIS)

## 5. DOCUMENTATION AND SAMPLES PROVIDED TO EURL

In accordance with the requirements of Regulation (EC) No 1831/2003, reference samples of *L-lysine sulphate produced by fermentation with non-genetically modified Corynebacterium glutamicum* CGMCC 23982 have been sent to the European Union Reference Laboratory for Feed Additives. The dossier has been made available to the EURL by EFSA.

## 6. REFERENCES

- [1] \*Forwarding of applications for authorisation of feed additives in accordance with Regulation (EC) No 1831/2003 – E-Submission Food Chain platform – <https://webgate.ec.europa.eu/esfc/#/applications/49770>  
<https://open.efsa.europa.eu/questions/EFSA-Q-2023-00712>
- [2] \*Application – Annex 1
- [3] Commission Implementing Regulation (EU) 2023/1163 of 14 June 2023 concerning the authorisation of L-Lysine monohydrochloride and L-Lysine sulphate produced by *Corynebacterium glutamicum* CGMCC 17927 as feed additives for all animal species, OJ L 154, 15.6.2023
- [4] Commission Implementing Regulation (EU) 2022/1525 of 13 September 2022 concerning the authorisation of L-lysine monohydrochloride and L-lysine sulphate produced by fermentation with *Corynebacterium glutamicum* CGMCC 14498 as feed additives for all animal species, OJ L 237, 14.9.2022
- [5] Commission Implementing Regulation (EU) 2021/2095 of 9 November 2021 concerning the authorisation of L-lysine base, L-lysine monohydrochloride and L-lysine sulphate as feed additives for all animal species O.J. L 427, 30.11.2021
- [6] Commission Implementing Regulation (EU) 2020/1798 of 30 November 2020 concerning the authorisation of L-lysine monohydrochloride produced by *Corynebacterium glutamicum* DSM 32932 and L-lysine sulphate produced by *Corynebacterium glutamicum* KFCC 11043 as feed additives for all animal species O.J. L 402, 01.12.2020
- [7] Commission Implementing Regulation (EU) 2020/997 of 9 July 2020 concerning the authorisation of L-lysine base, liquid, L-lysine sulphate and L-lysine monohydrochloride, technically pure, as feed additives for all animal species O.J. L 221, 10.07.2020
- [8] Commission Implementing Regulation (EU) 2019/1964 of 26 November 2019 concerning the authorisation of L-lysine base, liquid, L-lysine monohydrochloride, liquid, L-lysine monohydrochloride, technically pure, and L-lysine sulphate as feed additives for all animal species, OJ L 307, 28.11.2019
- [9] \*Technical dossier, Section II : II.1.3. Qualitative and quantitative composition
- [10] \*Technical dossier, Section II : II.2.1.2 Micro-organisms
- [11] \*Technical dossier, Section II: II.5.1. Proposed mode of use in animal nutrition
- [12] EURL reports:  
[https://joint-research-centre.ec.europa.eu/publications/fad-2018-0012\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2018-0012_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2018-0019\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2018-0019_en)

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[https://joint-research-centre.ec.europa.eu/publications/fad-2019-00160028\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2019-00160028_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2020-0008\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2020-0008_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2020-0067\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2020-0067_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2020-00820085\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2020-00820085_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2021-0051\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2021-0051_en)  
[https://joint-research-centre.ec.europa.eu/publications/fad-2021-0075\\_en](https://joint-research-centre.ec.europa.eu/publications/fad-2021-0075_en)

- [13] \*Technical dossier, Section II: II.6.1. Methods of analysis for the active substance
- [14] EN ISO 17180:2013 - Animal feeding stuffs – Determination of lysine, methionine and threonine in commercial amino acid products and premixtures
- [15] Commission Regulation (EC) No 152/2009 of 27 January 2009 laying down the methods of sampling and analysis for the official control of feed, O.J. L 54, 26.02.2009
- [16] Commission Implementing Regulation (EU) 2024/771 of 29 February 2024 amending Regulation (EC) No 152/2009 laying down the methods of sampling and analysis for the official control of feed, OJ L, 2024/771, 15.3.2024
- [17] EN ISO 13903:2005- Animal feeding stuffs – Determination of amino acids content
- [18] \*Technical dossier, Section II: II.4.1. Stability
- [19] European Pharmacopoeia Monograph 01/2008:20301 – Identification reactions of ions and functional groups – sulphates

\*Refers to Dossier no: FEED-2023-19630

## 7. RAPPORTEUR LABORATORY & NATIONAL REFERENCE LABORATORIES

The Rapporteur Laboratory for this evaluation is the European Union Reference Laboratory for Feed Additives, JRC, Geel, Belgium. This report is in accordance with the opinion of the consortium of National Reference Laboratories as referred to in Article 6(2) of Commission Regulation (EC) No 378/2005, as last amended by Regulation (EU) 2015/1761.

## 8. ACKNOWLEDGEMENTS

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- Państwowy Instytut Weterynaryjny, Pulawy (PL)
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  - Österreichische Agentur für Gesundheit und Ernährungssicherheit (AGES), Wien (AT)
  - Wageningen Food Safety Research (WFSR)<sup>1</sup> (NL)

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<sup>1</sup> Name and address according to according COMMISSION IMPLEMENTING REGULATION (EU) 2015/1761: RIKILT Wageningen UR, Wageningen.