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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 monohydrochloride and concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum KCCM 80216 (LU13544) (FAD-2020-0008; CRL/190064)



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Dossier related to:	FAD-2020-0008 - CRL/190064
Name of Product :	<i>L-lysine monohydrochloride and concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum</i> KCCM 80216 (LU13544)
Active Agent (s):	L-lysine
Rapporteur Laboratory:	European Union Reference Laboratory for Feed Additives (EURL-FA) JRC Geel, Belgium
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Report checked by: Date:	Stefano Bellorini 20/08/2020
Report approved by: Date:	Christoph von Holst 24/08/2020



EXECUTIVE SUMMARY

In the current application authorisation is sought under Article 4(1) for *L-lysine monohydrochloride* and *concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum* KCCM 80216 (LU13544), 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. Authorisation is sought for all animal species.

According to the Applicant *L-lysine monohydrochloride* has a minimum purity (mass fraction) of 99 %, while the *concentrated liquid L-lysine* contains at least 50 % of *L-lysine* and a maximal water content of 48 %.

The two forms of the *feed additive* are intended to be added directly into *feedingstuffs* or through *premixtures* (for *L-lysine monohydrochloride*). However the Applicant did not propose any minimum or maximum content of *L-lysine* in *feedingstuffs*.

For the quantification of *lysine* in the *feed additive* the Applicant proposed the ring-trial validated method EN ISO 17180:2013 based on ion-exchange chromatography coupled to visible or fluorescence detection (IEC-VIS/FLD). This standard method does not distinguish between the salts of amino acids and cannot differentiate between enantiomers. It applies for products containing more than 10 % of amino acid. The following performance characteristics are reported: a relative standard deviation for repeatability (RSD_r) ranging from 0.7 to 1.7 % and a relative standard deviation for reproducibility (RSD_R) ranging from 1.5 to 2.5 %. In addition, the EURL identified the "L-lysine monohydrochloride monograph" of the Food Chemical Codex (FCC) for the identification of *L-lysine monohydrochloride* in the *feed additive*.

For the quantification of *lysine* in *premixtures* and *feedingstuffs* the Applicant suggested using the ring-trial validated European Union method (Commission Regulation (EC) No 152/2009) based on IEC coupled with photometric detection (IEC-VIS). This method, designed only for the analysis of amino acids in *premixtures* and *feedingstuffs*, does not distinguish between the salts and the amino acid enantiomers. The following performance characteristics were reported for the quantification of total *lysine*: RSD_r ranging from 2.1 to 2.8 % and RSD_R ranging from 3.0 to 6.7 %.

In the frame of this authorisation the EURL recommends for official control (i) the "L-lysine monohydrochloride monograph" of the Food Chemical Codex (FCC) for the identification of *L-lysine monohydrochloride* in the *feed additive*; (ii) the ring-trial validated method EN ISO 17180:2013 based on IEC-VIS/FLD to quantify free *lysine* in the *feed additive* and *premixtures* (containing more than 10 % *lysine*) and (iii) the European Union method based on IEC-VIS for the quantification of *lysine* in *premixtures* and *feedingstuffs*.



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 monohydrochloride and *concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum* KCCM 80216 (LU13544), nutritional additives, amino acids, all animal species and categories

1. BACKGROUND

In the current application authorisation is sought under Article 4(1) (authorisation of a new feed additive) for *L-lysine monohydrochloride* and *concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum* KCCM 80216 (LU13544), 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. Authorisation is sought for all animal species [1-2]. These two forms of *L-lysine* are already authorised as *feed additives* under Commission Directive 88/485/EEC of 26 July 1988 amending the Annex to Council Directive 82/471/EEC concerning certain products used in animal nutrition (code 3.2.2. 3.2.3 and 3.2.4) [3].

According to the Applicant, the coarse off-white powder *L-lysine monohydrochloride* has a minimum purity (mass fraction) of 99 %, while the light brown *concentrated liquid L-lysine* contains a minimum of 50 % of *L-lysine* and a maximal water content of 48 % [1,4].

The *feed additives* are produced through fermentation by a non-toxicogenic and non-pathogenic genetically modified strain of *Corynebacterium glutamicum*. The production strain is deposited in the "Korean Centre of Microorganisms" (KCCM) under accession number KCCM 80216 (LU13544).

The two forms of the *feed additive* are intended to be added directly into *feedingstuffs* or through *premixtures* (for *L-lysine monohydrochloride*) [5]. However, the Applicant did not propose any minimum or maximum content of *L-lysine* in *feedingstuffs* [1,5].

Note: The EURL has previously evaluated the analytical methods for the determination of *lysine* in the frame of several dossiers [6].



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 monohydrochloride* and *concentrated liquid L-lysine* 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 quantification of *lysine* in the *feed additive* the Applicant proposed the ring-trial validated method EN ISO 17180:2013 - "Animal feeding stuffs - Determination of lysine, methionine and threonine in commercial amino acid products and premixtures" [7]. This standard method is based on the experimental protocol described in the EU method for the analysis of free amino acids (including *lysine*) [8]. It does not distinguish between the salts of amino acids and cannot differentiate between enantiomers. It applies for products containing more than 10 % of amino acid.

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 High Performance Liquid Chromatography (HPLC) with an Ion Exchange Column (IEC). Free *lysine* is quantified either after post-column derivatisation with ninhydrine and visible (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. The performance characteristics reported for the quantification of free *lysine* are listed in Table 1.

Based on the performance characteristics available, the EURL recommends for official control the EN ISO 17180:2013 method for the quantification of free *lysine* in the *feed additive* and *premixtures* (containing more than 10 % *lysine*).



Table 1: Method performance characteristics obtained in the frame of ring-trial validation studies	
(EN ISO 17180:2013 [7], European Union method [8] and EN ISO 13903:2005 [9]) for the	
determination of total lysine in the feed additive, premixtures and feedingstuffs.	

Ring-Trial	Matrix	<i>lysine</i> content g/kg	RSD _r %	RSD _R %
[7]	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
[8]	Mixed pig feed	10	2.8	3.2
	Broiler compound	14	2.1	5.4
	Protein concentrate	48	2.4	3.0
	Premix	98	2.1	6.7
[9]	Poultry meal	3.6	3.1	9.9
	Broiler finisher feed	3.5	3.5	9.0
	Broiler starter feed	1.4	2.4	9.0
	Corn	0.3	3.1	13.1
	Fishmeal	4.2	2.8	7.9

RSD_n, RSD_R - relative standard deviation for repeatability and reproducibility, respectively

For the quantification of *lysine* in *premixtures* and *feedingstuffs* the Applicant suggested using the European Union (EU) method dedicated for the determination of amino acids in feed [8]. This method was designed for the quantification of free (synthetic and natural) and of total (peptide-bound and free) amino acids in *premixtures* and *feedingstuffs*, using an amino acid analyser or IEC coupled with post-column derivatisation and VIS detection. 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 photometric 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 hours. The hydrolysate is adjusted to



pH 2.2. The amino acids are separated by IEC and determined by post-column derivatisation with ninhydrin and photometric detection at 570 nm.

The EU method was ring-trial validated using four different matrices listed in Table 1. This method was further ring-trial validated by twenty-three laboratories, resulting in the EN ISO 13903:2005 method [9]. The performance characteristics reported for the quantification of total *lysine* are listed in Table 1. Furthermore, the following limits of quantification were reported for free *lysine* and total *lysine*: 0.04 and 0.3 g/kg *feedingstuffs*, respectively [9].

The Applicant did not request the use of the *feed additive* in *water* in the frame of this application authorisation, but nevertheless proposed the ring-trial European Union (EU) method for the analysis of the feed additive in *water* [10]. Moreover, as concluded in previous amino acids reports [6], the EURL considers the IEC-VIS procedure described as fit-for-purpose for the potential determination of *lysine* in *water*.

Based on the performance characteristics available, the EURL recommends for official control the ring-trial validated EU method based on IEC-VIS to quantify *lysine* in *premixtures* and *feedingstuffs*.

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)

The 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)

The EURL found the Food Chemical Codex (FCC) "L-lysine monohydrochloride monograph", where different tests (including optical rotation) are used for the identification of *L-lysine monohydrochloride* in the *feed additive* [12].

The EURL recommends the Food Chemical Codex monograph for the identification of *L-lysine monohydrochloride*.

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 "L-lysine monohydrochloride monograph" of the Food Chemical Codex (FCC) for the identification of *L-lysine monohydrochloride* in the *feed additive*; (ii) the ring-trial validated method EN ISO 17180:2013 based on ion-exchange chromatography coupled to visible or fluorescence



detection (IEC-VIS/FLD) to quantify free *lysine* in the *feed additive* and (iii) the European Union method based on IEC-VIS for the quantification of *lysine* in *premixtures* and *feedingstuffs*.

Recommended text for the register entry (analytical method)

For the identification of *L*-lysine monohydrochloride in the feed additive:

- Food Chemical Codex "L-lysine monohydrochloride monograph"

For the quantification of *lysine* in the *feed additive and premixtures* (containing more than 10% *lysine*):

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

For the quantification of *lysine* in *premixtures* and *feedingstuffs*:

 ion-exchange chromatography coupled with post-column derivatisation and photometric detection (IEC-VIS), Commission Regulation (EC) No 152/2009 (Annex III, F)

5. DOCUMENTATION AND SAMPLES PROVIDED TO EURL

In accordance with the requirements of Regulation (EC) No 1831/2003, reference samples of *L-lysine monohydrochloride* and *concentrated liquid L-lysine produced by fermentation with Corynebacterium glutamicum* KCCM 80216 (LU13544) 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] *Application, Proposal of Registry Entry Annex A
- [2] *Application, Reference SANTE/E5: FORW. APPL. 1831/0011-2020 & Annex I submission number 1579175385327-2514
- [3] Commission Directive 88/485/EEC of 26 July 1988 amending the Annex to Council Directive 82/471/EEC concerning certain products used in animal nutrition, O.J. L 239/36, 30.08.1988
- [4] *Technical dossier, Section II: II.2.1.3. Qualitative and quantitative composition
- [5] *Technical dossier, Section II: II.5.1. Proposed mode of use in animal nutrition
- [6] EURL Evaluation Reports: <u>https://ec.europa.eu/jrc/sites/jrcsh/files/FinRep-FAD-2013-0027_L-lysine.pdf</u> <u>https://ec.europa.eu/jrc/sites/jrcsh/files/finrep-fad-2013-0045_l-lysine%20sulphate.pdf</u> <u>https://ec.europa.eu/jrc/sites/jrcsh/files/finrep-fad-2016-0052_lysine.pdf</u> <u>https://ec.europa.eu/jrc/sites/jrcsh/files/finrep_fad-2017-0024_lysine.pdf</u>



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- [7] EN ISO 17180:2013 Animal feeding stuffs Determination of lysine, methionine and threonine in commercial amino acid products and premixtures
- [8] 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
- [9] EN ISO 13903:2005- Animal feeding stuffs Determination of amino acids content
- [10] *Technical dossier, Section II: II.6.1. Methods of analysis for the active substance
- [11] 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 O.J. L 307, 28.11.2019

[12] Food Chemical Codex monograph "L-lysine monohydrochloride", FCC 7 (2010), p.598*Refers to Dossier no: FAD-2020-0008

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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- Instytut Zootechniki Państwowy Instytut Badawczy, Krajowe Laboratorium Pasz, Lublin (PL)

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