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# Carcinogenic potential of sanguinarine, a phytochemical used in 'therapeutic' black salve and mouthwash

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1 **Carcinogenic Potential of Sanguinarine, a Phytochemical used in**  
2 **‘Therapeutic’ Black Salve and Mouthwash.**

3

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20 **Key Words**

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21 Sanguinarine; black salve; skin cancer; genotoxin; carcinogenesis; topical; bloodroot;

22 *Sanguinaria canadensis*; escharotic.

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## 26 **Abstract**

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27 Black salves are escharotic skin cancer therapies in clinical use since the mid 19<sup>th</sup> century.  
28 *Sanguinaria canadensis*, a major ingredient of black salve formulations, contains a number of  
29 bioactive phytochemicals including the alkaloid sanguinarine. Despite its prolonged history  
30 of clinical use, conflicting experimental results have prevented the carcinogenic potential of  
31 sanguinarine from being definitively determined.

32 Sanguinarine has a molecular structure similar to known polyaromatic hydrocarbon  
33 carcinogens and is a DNA intercalator. Sanguinarine also generates oxidative and  
34 endoplasmic reticulum stress resulting in the unfolded protein response and the formation of  
35 8-hydroxyguanine genetic lesions. Sanguinarine has been the subject of contradictory *in vitro*  
36 and *in vivo* genotoxicity and murine carcinogenesis test results that have delayed its  
37 carcinogenic classification. Despite this, epidemiological studies have linked mouthwash that  
38 contains sanguinarine with the development of oral leukoplakia, sanguinarine also proposed  
39 as an aetiological agent in gallbladder carcinoma.

40 This literature review investigates the carcinogenic potential of sanguinarine. Reasons for  
41 contradictory genotoxicity and carcinogenesis results are explored, knowledge gaps identified  
42 and a strategy for determining the carcinogenic potential of sanguinarine especially relating to  
43 black salve are discussed. As patients continue to apply black salve, especially to skin regions  
44 suffering from field cancerization and skin malignancies, an understanding of sanguinarines  
45 genotoxic and carcinogenic potential is of urgent clinical relevance.

## 46 **1. Introduction**

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47 Patients often associate natural therapies as being safe with a reduced risk of toxicity [1]. This  
48 can be a dangerous misconception with natural product exposures responsible for a range of  
49 toxicities and fatalities [2]. While natural products may possess anti-mutagenic properties,  
50 they also include some of the most potent carcinogens known to humankind [3]. Unlike  
51 pharmaceuticals, rigorous pre-clinical testing of natural therapies is not a regulatory  
52 requirement for their sale to consumers placing patients at risk of adverse outcomes [4].

53 Topical skin cancer therapies are often applied to tissue that has been chronically exposed to  
54 carcinogenic ultraviolet radiation (UVR) with both UVA and UVB inducing genetic damage  
55 to skin cells [5]. Over time UVR results in the formation of abnormal clonal cellular areas,  
56 patches of damaged skin with altered p53 tumor gene expression levels, in a process referred  
57 to as field cancerization [6]. It is therefore especially important that topical therapeutics,  
58 which may be applied to UV-induced precancerous skin regions and skin malignancies, are  
59 assessed for their mutagenic and carcinogenic potential.

60 Black salve is an alternative skin cancer therapy available for purchase online. It contains a  
61 number of constituents that vary in composition and concentration between vendors including  
62 bloodroot (*S. canadensis*), chaparral (*Larrea tridentata*), graviola (*Annona muricata*),  
63 oleander (*Nerium oleander*) and zinc chloride among others. A number of these botanical  
64 extracts and their constituent phytochemicals have not been assessed for mutagenic or  
65 carcinogenic potential.

66 Black salve has never been studied in a systematic clinical trial, with only a limited number  
67 of patient outcomes being reported in case studies [7]. Patients with melanoma [8], squamous  
68 cell carcinoma [9] and basal cell carcinoma [10] have experienced black salve treatment  
69 failures. Whether black salve altered the natural history or metastatic potential of these  
70 malignancies is currently unknown, as is the rate of new skin cancer formation in black salve  
71 treated areas.

72 *S. canadensis* is a key ingredient of black salve. It contains quaternary benzophenanthridine  
73 alkaloids, chelerythine, chelilutine, chelirubine, sanguilutine with sanguinarine being the  
74 main alkaloid in bloodroot and black salve formulations [11]. There are concerns about the  
75 carcinogenic potential of sanguinarine arising from reports of an association with  
76 mouthwash-induced leukoplakia and gallbladder carcinoma [12], [13]. The usual battery of  
77 *in-vitro* genotoxicity tests and murine studies on sanguinarine have given mixed and  
78 conflicting results [14], [15], [16], [17]. This literature review explores the evidence relating  
79 to the carcinogenic potential of sanguinarine, the main alkaloid present in black salve.

80

## 81 **2. Mechanisms of Sanguinarine Carcinogenesis**

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### 82 ***2.1 DNA Intercalation***

83 Sanguinarine can exist as a charged iminium (pH 2-6) or uncharged alkanolamine (pH 6.5-9.0)  
84 form, at physiological pH (7.4) both forms are present [18, 19] (Figure 1). Spectroscopic  
85 studies involving calf thymus DNA suggests the iminium form of sanguinarine binds to DNA,  
86 exhibiting GC base pair specificity [19]. Thermodynamic analysis has revealed DNA binding

87 is exothermic and enthalpy driven, which is indicative of intercalative binding [20].

88

89 **Figure 1: Attached Separately**

90 DNA intercalators are able to interfere with the action of DNA polymerase thus impairing

91 DNA replication, especially in rapidly dividing cancer cells. As a result, the mechanism of

92 DNA intercalation has been harnessed by the anthracycline chemotherapy agents doxorubicin

93 and the topoisomerase II inhibitor mitoxantrone [21]. Sanguinarine cytotoxicity correlates

94 with its DNA intercalating ability, with DNA single-strand breaks occurring before the

95 initiation of apoptosis induced double strand breaks, suggesting genotoxic activity [22], [23].

96 DNA intercalators are usually associated with frameshift mutations as they increase the

97 distance between adjacent DNA base pairs [24]. Paradoxically some agents used to treat

98 cancer may result in the development of secondary malignancies. For example, anthracycline

99 intercalating agents can cause leukemia's and myelodysplasia [25] by inducing chromosomal

100 disruption with the subsequent development of tumor forming translocations [26].

101 Sanguinarine is a strong DNA intercalator [27], with a binding constant to calf thymus DNA

102 of  $1.00 \times 10^6 \text{ M}^{-1}$  [28] being similar to the binding constants of anthracycline chemotherapy

103 agents daunorubicin ( $1.27 \times 10^6 \text{ M}^{-1}$ ) and doxorubicin ( $2.04\text{-}3.3 \times 10^6 \text{ M}^{-1}$ ) [29, 30]. The

104 strong intercalative binding action of sanguinarine, as with anthracycline agents, may damage

105 DNA with carcinogenic consequences.

106

## 107 **2.2 Reactive Species Generation**

108 Free radicals are chemical moieties that contain orbiting unpaired electrons. They are  
109 unstable, reactive and able to interact with and damage cellular proteins, lipids and nucleic  
110 acids [31]. Reactive Oxygen Species (ROS) contain biologically active reactive oxygen  
111 functional groups such as hydrogen peroxide ( $H_2O_2$ ) and singlet oxygen [32]. Oxidative  
112 stress being an indirect mechanism through which carcinogens can exert genotoxic effects.  
113 ROS have been shown to act in cancer initiation, promotion and progression [33], [34], [35],  
114 [36].

115 Sanguinarine induces ROS in a range of cell lines [37], [38] and also in a murine *in vivo*  
116 model [39], by mechanisms that are not as well established as for UVA radiation. While UVA  
117 activates nicotinamide adenine dinucleotide phosphate-oxidase (NADPH) oxidase,  
118 facilitating electron transfer to molecular oxygen creating superoxide anions, sanguinarine  
119 appears to be reduced spontaneously by NADPH-producing superoxide anions without  
120 requiring a catalytic enzyme [40]. Subsequent intracellular sanguinarine re-oxidation can  
121 occur, suggesting redox cycling as a mechanism by which sanguinarine rapidly generates  
122 large amounts of ROS, in particular  $H_2O_2$  [41]. Redox cycling is more likely to occur in  
123 proliferating cells with high NADPH concentrations that then reduce nucleotides for DNA  
124 synthesis, and less likely to occur in cells, such as the MCF breast cancer cell line, that  
125 contain higher levels of catalase [42].

126 When assessing the ROS effects of sanguinarine in SPCA1 human lung adenocarcinoma cells,  
127 endoplasmic reticulum (ER) stress was found to be induced [43]. It is well established that



128 ROS can cause the misfolding or unfolding of proteins which accumulate in the ER lumen  
129 [44], resulting in the unfolded protein response (UPR) molecular cascade [45]. While the  
130 UPR is an anti-cancer target [46], continuous ER stress creates a positive ROS feedback loop  
131 [47]. From the current evidence, sanguinarine therefore appears to activate the ROS-ER stress  
132 cycle, and amplifies the oxidative damage sustained by cells [43].

133 Sanguinarine has also been shown to generate reactive nitrogen species (RNS), in LNCaP  
134 prostate cancer epithelial cells exposed to 3 $\mu$ g/ml sanguinarine experience having increased  
135 nitric oxide (NO) production [48]. The mechanism for sanguinarine induced NO generation is  
136 currently unknown, although neoplastic prostate cancer cell lines express higher levels of  
137 inducible Nitric Oxide Synthase (iNOS) than their non-neoplastic counterparts [49]. In the  
138 epidermis, human keratinocytes express all three isoforms of NOS, including iNOS [50] [51].  
139 Human skin fibroblasts stimulated with cytokines and lipopolysaccharides have been shown  
140 to express both constitutive and inducible NOS [52]. Although not yet studied in human  
141 keratinocytes, if sanguinarine increases RNS production then the generation of highly  
142 reactive peroxynitrite (ONOO<sup>-</sup>) is likely to increase its genotoxic potential in skin.

143 A number of factors affect antioxidant levels in human skin. The epidermis, being the body's  
144 main barrier to environmental exposures has significantly higher levels of enzymatic  
145 (superoxide dismutase (SOD), catalase) and non-enzymatic (Vitamin C, Vitamin E, uric acid  
146 and glutathione) antioxidants than the dermis [53]. Aged skin has normal levels of enzymatic  
147 anti-oxidants but non-enzymatic antioxidant levels are 60-70% of those found in younger  
148 skin [54]. Sanguinarine exposure can result in a rapid and severe depletion of cellular

149 glutathione (GSH) in PC3 and L-929 cell lines. Similarly, in human hepatocytes sanguinarine  
150 has been shown to result in reduced GSH levels and cell death without an increase in  
151 malondialdehyde (MDA) production, a marker of lipid peroxidation [55]. Sanguinarine GSH  
152 depletion appears to occur via addition of GSH to iminium bond of sanguinarine in a 1:1 ratio  
153 and not due to the generation of ROS [56]. An analogous interaction is suggested with  
154 SH-enzymes [57]. Whether sanguinarine exerts a similar antioxidant depleting effect in  
155 human skin is currently not known.

156 UVA is a known carcinogen that exerts a significant proportion of its carcinogenic effect  
157 through the generation of reactive species [35], [34]. Sanguinarine has been found in a  
158 number of normal and malignant cell lines to generate a reactive species profile similar to  
159 that of UVA [58]. Additionally, the process of redox cycling, ROS-ER stress cycle activation  
160 and antioxidant depletion may amplify the cellular oxidative stress and carcinogenic potential  
161 that may occur from sanguinarine exposure. Cells exposed to high levels of ROS undergo  
162 apoptosis or necrosis [59], although sublethal ROS doses can result in genotoxicity that a cell  
163 is unable to repair completely [60], [61], increasing the likelihood of gene mutations that  
164 ultimately may lead to cancer [62], [63].

165 Despite a number of studies investigating the action of sanguinarine as an oxidant and its  
166 ability to cause genetic damage, surprisingly only one study has searched for the presence of  
167 the ROS induced 8-hydroxyguanine. This effect in sanguinarine exposed HCT116 human  
168 colon cancer cells indicates that sanguinarine can induce guanine oxidative genetic damage  
169 [58].

### 170 *2.3 DNA Adduct Formation and Sanguinarine Metabolism*

171 In a <sup>32</sup>P-postlabelling assay, sanguinarine when incubated with β-naphthoflavone (β-NF)  
172 activated rat hepatic microsomes, resulted in DNA adduct formation [64]. This was  
173 concentration dependent, a sanguinarine concentration of 100μM causing 36.3 DNA adducts  
174 per 10<sup>8</sup> nucleotides, 10μM causing 3.2 DNA adducts per 10<sup>8</sup> nucleotides and 1μM not  
175 resulting in the formation of detectable DNA adducts by using a nuclease P1 enriched <sup>32</sup>P-  
176 postlabeling assay [64]. Whether the DNA adducts detected in this study were genuine  
177 adducts or artefacts generated during oxidative DNA damage [65] has been questioned [42].  
178 While DNA adducts may be formed by reactive oxygen species and lipid peroxidation [66],  
179 malondialdehyde generation was not detected, suggesting these processes were not  
180 responsible for the observed DNA adduct formation [55]. While adducts may have formed in  
181 a rat liver microsome system, they either do not form after an equivalent sanguinarine  
182 exposure in human hepatocytes, or any adducts that form are repaired and removed [67]. In a  
183 90 day feeding trial of pigs, toxicity studies with 64ppm sanguinarine ingestion failed to  
184 show liver DNA adduct formation utilizing <sup>32</sup>P-postlabeling [68]. Plasma sanguinarine levels  
185 of 0.11μg/ml and liver levels of 0.13μg/g in the highest exposure group were reported,  
186 although these are below the concentration at which DNA adducts were induced in the  
187 positive rat liver microsome study [64].

188 Once formed, DNA adduct stability and the risk of its ability to induce a persistent somatic  
189 mutation is determined by the cells replication rate and DNA repair capacity [69], [70]. When  
190 DNA adducts are used in quantitative risk assessment, induced DNA adduct levels should be

191 compared to the tissues background adduct formation level in each tissue [71]. Care should  
192 be exercised when extrapolating animal adduct results for assessing human risk, as humans  
193 have greater sensitivity to tumor induction than mice when exposed to some carcinogens  
194 [72].

195 With sanguinarine not resulting in definite adduct formation, research has subsequently  
196 focused on whether the metabolism of sanguinarine generates a DNA adduct forming  
197 metabolite. Observations that sanguinarine toxicity in mice is reduced by  
198 3-methylcholanthrene, a CYP450 inducer, suggests sanguinarine is metabolized by CYP450  
199 [73]. CYP1A, a member of the CYP450 family, has been found to metabolize polycyclic  
200 aromatic hydrocarbons (PAH) to generate reactive epoxides that have carcinogenic potential  
201 [74]. Sanguinarine shares a similar structure to PAHs, raising the possibility of sanguinarine  
202 also being metabolized by CYP450 to an epoxide metabolite [75].

203 Sanguinarine has been shown to undergo dihydro derivative formation by *in vitro* UV-Vis  
204 spectrometry and fluorimetry [76], this being confirmed by an *in vivo* rodent study [77].  
205 Kosina et al in 2011 [78], further elucidated the multi-step metabolism of sanguinarine in  
206 human hepatocytes using electrospray quadrupole ion-trap mass spectrometry with reversed  
207 phase chromatographic analysis. They found that dihydrosanguinarine (DHSG) is oxidized  
208 by cytochrome P450 enzymes resulting in O-demethyl and hydroxyl metabolite formation.  
209 These metabolites subsequently appeared to undergo Phase II biotransformation, being  
210 conjugated by glucuronidases and sulfotransferases, as determined by the respective MS mass  
211 measurements and fragmentation patterns of the resultant compounds. Sanguinarine epoxide

212 metabolites suspected of having carcinogenic potential were not detected in this analysis [78].  
213 Dihydrosanguinarine is the main phase I metabolite of sanguinarine [78]. In a 90 day rat  
214 feeding study [79] DHSG reached a maximal plasma concentration of 28ng/ml with a  
215 maximal liver concentration of 130ng/ml. No liver adduct formation was detected following  
216 exposure to these low DHSG concentrations.

#### 217 ***2.4 DNA Repair Mechanisms***

218 Alkaloids may potentially disrupt DNA repair mechanisms. The catalytic subunit of human  
219 telomerase (hTERT) upregulates DNA repair genes and increases the nucleoside triphosphate  
220 (NTP) pool available for correcting DNA lesions [80]. A number of alkaloids inhibit  
221 telomerase activity by suppressing hTERT mRNA expression, including the isoquinoline  
222 alkaloids, chelidonine [81] and papaverine [82]. Sanguinarine has been shown to disrupt  
223 telomerase activity through G-quadruplex binding with an 8 $\mu$ M concentration resulting in a  
224 76% reduction in telomerase activity [83] but its effect on hTERT is not currently known.  
225 While telomerase is a valid anticancer target being overexpressed in 85% of human  
226 malignancies [84], the impact of telomerase targeting compounds on DNA repair processes is  
227 unclear. By impairing DNA repair, such agents may pose a mutagenic risk for normal and  
228 malignant cells.

229 Inflammation has also been shown to inhibit DNA repair by up to 70% in  
230 cholangiocarcinoma cells via NO mediated DNA repair enzyme nitrosylation [85]. While  
231 sanguinarine has been shown to induce NO production in prostate carcinoma cells [48], a  
232 number of studies have found sanguinarine to have an anti-inflammatory effect [86], [87],

233 [88]. Black salve however has been associated with histological evidence of significant  
234 inflammation in humans [89], either due to the effect of sanguinarine or other salve  
235 constituents. This inflammation may impair DNA repair, aggravating any genotoxic effects.  
236 Current genotoxicity testing protocols do not directly assess the impact of a compound on  
237 DNA repair processes. Due to human inter-individual variation in DNA repair capabilities,  
238 the developing field of personalized medicine may in the future incorporate an assessment of  
239 an individual's genetic repair capacity when determining toxicity risk. The effect of  
240 sanguinarine on DNA repair mechanisms is currently unknown.

## 241 ***2.5 Tumor Immune Surveillance***

242 Organ transplant patients can have a 100-fold increased risk of non-melanoma skin cancer  
243 compared to the general population [90] arising from the use of anti-rejection medications  
244 [91]. Nearly 100% of patients diagnosed with non-melanoma skin cancers develop immune  
245 suppressive effects from UV exposure compared to 40% in the general population [92], [93].  
246 These findings highlight the importance that immune surveillance plays in limiting skin  
247 carcinogenesis.

248 UV-induced immunosuppressant cellular and cytokine effects are triggered either by DNA  
249 damage to skin immune cells or by oxidative stress [94], [95]. Both mechanisms may result  
250 from sanguinarine exposure. Currently the effect of sanguinarine on skin immune cell  
251 numbers and function is unknown, as is its potential impact on skin immune surveillance and  
252 carcinogenesis.

### 253 **3. Assessment of Sanguinarine Genotoxicity**

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254 In order to register a pharmaceutical compound there is a regulatory requirement to carry out  
255 and report genotoxicity testing to assess carcinogenicity, and in some instances to assess the  
256 risk of heritable mutation [96], [97]. A battery of genotoxicity tests based on micro-organism  
257 and mammalian systems are routinely employed to detect compound-induced DNA damage  
258 (Table 1).

#### 259 **3.1 Sanguinarine In Vitro Genotoxicity Results**

260 Following S9 activation sanguinarine and sanguinaria extract yield positive Ames test results  
261 [98], [99]. Sanguinarine has been shown to elicit a positive mutagenic response [98] in TA98,  
262 TA100, TA1537 and TA1538 strains, suggesting it may induce frame-shift mutations [99].  
263 Interestingly in one study where sanguinaria extract, derived from *S. canadensis* rhizomes,  
264 contained the full complement of bloodroot phytochemicals, a positive Ames test result was  
265 observed with metabolic activation only in the one TA1538 tester strain [99]. Despite these  
266 positive Ames test results, sanguinarine has returned negative genotoxicity test results in the  
267 SOS chromotest [100] and *Saccharomyces cerevisiae* mutation test [98]. While the Ames test  
268 has a greater capacity for identifying carcinogens, the SOS chromotest has a lower false  
269 positive rate [101]. Unfortunately, the majority of these were industry studies where  
270 experimental methodology was not available for peer-reviewed scrutiny [99].

271 Sanguinarine has also produced conflicting *in vitro* mammalian results with Comet assays  
272 being positive while Micronucleus assays have yielded negative genotoxicity results. Positive  
273 Comet assays following sanguinarine exposure were reported from several studies in murine

274 and human cell lines [102], [40], [103], [104] at low concentrations from 1µg/ml [102].  
275 Human gingival fibroblasts develop 2 to 3-fold higher single DNA strand break levels in the  
276 Comet assay in response to sanguinarine compared to prostate cancer cell lines LNCaP and  
277 DU-145 [105]. This was observed in the absence of a significant increase in gingival  
278 fibroblast apoptosis, suggesting gingival fibroblasts may be more susceptible to sanguinarine  
279 genotoxic injury than prostate cancer cells [105].

280 There is evidence that sanguinarine can induce rapid *in vitro* genetic damage. In one study,  
281 after a one hour exposure a concentration of 4µg/ml caused 10% of human CEM leukemia T  
282 cells to have comet assay detectable DNA damage, and this increased to 60% of cells by 3 h.  
283 These cells showed a bimodal mechanism of cytotoxicity with some displaying poly  
284 (ADP-ribose) polymerase-1 (PARP-1) fragmentation indicative of apoptosis and others being  
285 propidium iodide positive indicative of necrosis [14]. Another study investigated the timing  
286 of comet assay DNA single and double strand break formation in HCT116 colon cancer cells  
287 treated with 3µM sanguinarine. Single strand breaks developed after 45 min, while double  
288 strand breaks developed after 90 min, around the time apoptosis markers such as PARP  
289 cleavage appeared, suggesting sanguinarine possesses reactive species genotoxicity apart  
290 from its cytotoxic apoptotic effects. The single strand breaks showed guanine oxidation to  
291 8-Oxo-2'-deoxyguanosine characteristic of oxidative stress with antioxidant treatment  
292 preventing DNA single strand breaks and reducing DNA double strand breaks to control  
293 levels [58].

294 Due to the significant cytotoxicity displayed by sanguarine against a number of normal and



295 malignant cell types [7], the comet assay may be prone to potentially false positive  
296 genotoxicity test results. [106]. Human keratinocytes and hepatocytes have shown greater  
297 resistance to sanguinarine cytotoxicity than other cell types [107], [108] and may represent  
298 better models for the *in vitro* Comet assay testing of sanguinarine.

299 Contradictory negative *in vitro* genotoxicity results for sanguinarine have however been  
300 reported using the micronucleus assay. In the presence of rat liver S9, human lymphocytes  
301 and the metabolically competent Hep-G2 human hepatoma cell line showed no micronucleus  
302 formation when exposed to sanguinarine concentrations up to 5 $\mu$ M [15]. This study tested a  
303 total of fifteen natural products including five established rodent carcinogens arecoline, plant  
304 extract aristolochic acid, B-asarone, psoralen and safrole, promoters of carcinogenesis  
305 coumarin, isatidine dehydrate, monocrotaline, retrorsine, tannin and thiourea, in addition to  
306 compounds suspected of carcinogenic activity benzyl acetate, emodine, reserpine and  
307 sanguinarine chloride. All of the established carcinogens in this study with the exception of  
308 safrole showed genotoxicity, the suspected carcinogens monocrotaline and retrorsine also had  
309 negative genotoxicity results. While other groups also reported negative safrole results with  
310 rat hepatocytes [109], they did show safrole as clearly positive in the Hep-G2 system [110].  
311 This suggested that the Hep-G2 subclone used by the authors may differ in its metabolic  
312 activation capacity and raises questions regarding the accuracy of sanguinarines negative  
313 micronucleus assay result.

314 The lack of clarity surrounding inferences from *in vitro* testing of sanguinarine include the  
315 equivocal results obtained when tested in the Chinese hamster ovary (CHO-HPRT)

316 mutagenesis assay [99]. In one industry study relayed by Munro et al [99] a significant  
317 increase in mutant CHO cell numbers occurred in the presence of S9 at a sanguinarine  
318 concentration of 10µg/ml. This was in the absence of mutant frequency increases at lower  
319 dose levels. An industry study also reported by Munro et al [99] produced similar results with  
320 a concentration of 10µg/ml increasing mutant frequency with no mutants forming below this  
321 concentration. The CHO-HPRT mutagenesis assay results were considered inconclusive. The  
322 selective use of such data by Munro et al [99] to refute concerns about the safety of  
323 sanguinarine, without the company that conducted the studies making the research available  
324 for public scrutiny, is a disappointing display where commercial interests seem to have taken  
325 precedence over patient safety.

326 The inconclusive assessment from sanguinarines *in vitro* genotoxicity testing has led to a  
327 need for clarification with *in vivo* toxicity studies. *In vitro* metabolism systems contain  
328 restricted Phase I and II enzyme subsets that preferentially enable oxidative cytochrome  
329 P450-mediated reactions [111]. Alternate metabolic processes are utilized by a number of  
330 mutagens to form genotoxic metabolites that are often not assessed by current *in vitro* assays  
331 [112]. *In vivo* toxicity studies however operate in a physiological system that utilizes  
332 reduction, hydrolysis and conjugation in addition to oxidation with a full complement of  
333 Phase I and II enzymes [113]. Current *in vitro* genotoxicity assays have high false positive  
334 rates, this being another reason for use of *in vivo* assessment of compounds. One analysis  
335 found that of 700 compounds that were known rodent non-carcinogens, 75-95% generated a  
336 positive result in at least one *in vitro* genotoxicity test [114]. This outcome is supported by a

337 study assessing over 1,000 pharmaceutical compounds [115], [116]. Chemicals that are  
338 genotoxic *in vitro* therefore require further evaluation *in vivo* in order to establish their  
339 potential risk to humans.

340

341 **Table 1: See End of Document**

342

### 343 ***3.2 Sanguinarine In Vivo Genotoxicity Assessment***

344 Several *in vivo* assays have been used in an attempt to determine the genotoxicity and  
345 carcinogenic potential of sanguinarine (Table 2). These have unfortunately not clarified the  
346 compound's toxicity status, with methodology problems, unpublished non-peer reviewed  
347 industry studies and contradictory results all contributing to uncertainty and a lack of  
348 consensus.

349 Regulatory agencies have increasingly accepted the *in vivo* Comet assay as a reliable  
350 genotoxicity test [117], [118] following the development of a standardized protocol [119]. It  
351 has been validated showing 73.7% to 78.9% sensitivity with 19 known genotoxins in liver  
352 and stomach tissues respectively [120]. As with the *in vitro* comet assay, the *in vivo* assay  
353 may detect cytotoxic rather than genotoxic compounds. To reduce false positive results,  
354 histopathological correlation and cell analysis for cytotoxicity are often performed.

355 Male Swiss albino mice given a single intra-peritoneal injection of sanguinarine starting at a  
356 dose of 2.7mg alkaloid/ kg body weight, developed bone marrow and blood cell signs of

357 genotoxicity starting with an increase in comet tail length. At 5.4mg/kg Olive Tail Moment  
358 (OTM) and tail length increased by 14-32% while 10.8mg/kg caused a significant increase of  
359 33-51% OTM, tail length and tail DNA [121]. This suggests that a single sanguinarine  
360 exposure can result in cellular genetic damage in a dose dependent manner. The sanguinarine  
361 in this study however was of low purity (88%), being a precipitation product obtained from  
362 argemone oil. Argemone oil is an alternative botanical source of sanguinarine, that comes  
363 from the seeds of *Argemone mexicana* Linn, and has independently been shown to possess  
364 genotoxic potential [122, 123]. In a murine model the intraperitoneal injection of argemone  
365 oil resulted in positive micronucleus and chromosomal aberration tests at a 1ml/kg body  
366 weight dose and positive comet assays at a 0.25ml/kg body weight dose in lymphocytes/  
367 hepatocytes and bone marrow cells [122]. Whether this is due to the sanguinarine contained  
368 within the argemone oil or other factors is yet to be determined. Therefore, any conclusions  
369 drawn from positive sanguinarine genotoxicity test results using low purity sanguinarine,  
370 with possible argemone oil contaminants, should be considered with caution. *Macleaya*  
371 *cordata* extract is primarily composed of quaternary benzophenanthridine alkaloids including  
372 sanguinarine 528.95 g/kg and chelerythrine 82.05 g/kg, with a minor quantity of protopine  
373 and allocryptopine [124]. A subsequent study using such an extract, orally administered to  
374 rats showed no hepatocyte adduct formation and no evidence of lymphocyte or hepatocyte  
375 genotoxicity in Comet assay [125]. Since less than 5% of ingested sanguinarine is absorbed  
376 [77], oral sanguinarine administration without the determination of plasma sanguinarine  
377 levels may translate to blood concentrations too low for comet assay positivity yielding false

378 negative results.

379 *In vivo* micronucleus (MN) assays have also been developed as a genotoxicity screening tool  
380 [126]. *Sanguinaria* extract at doses up to 14.2mg/kg bw administered intraperitoneally on two  
381 occasions 24 h apart were investigated by *in vivo* MN assay in CD-1 mice. While bone  
382 marrow polychromatic erythrocytes showed no increases in MN formation [99], this  
383 information derives from an industry study conducted by Vipont Pharmaceuticals Inc  
384 (manufacturer of Viadent) that is unpublished and not available for public scrutiny. This  
385 prevents an assessment of sample size and research methodology, undermining its value.  
386 Compared to the normal practice of sampling bone marrow 24 h after the second compound  
387 exposure [127], bone marrow was collected 6 h after the second dosing. This may not have  
388 allowed sufficient time for MN formation and detection. There have been no peer-reviewed  
389 reports to date of *in vivo* MN assessment of sanguinarine.

390 Sanguinarine has been assessed for its effect on *in vivo* chromosome aberration and sister  
391 chromatid exchange. Mice administered sanguinarine chloride intraperitoneally at 5, 10 and  
392 15mg/kg body weight concentrations had bone marrow cell changes suggestive of  
393 genotoxicity, with a minimum effective concentration of 10mg/kg [128]. The sanguinarine in  
394 this experiment was a defined product from Sigma, which reduces concerns of purity and  
395 contamination. The chromosomal aberrations observed were largely chromatid breaks with  
396 occasional chromosome breaks. Positive control mitomycin C gave a 28-fold higher  
397 chromosomal aberration rate compared to the negative control, with a five fold higher rate  
398 than sanguinarines minimum effective concentration. The SCE induction and predominance

399 of chromatid-type breaks were consistent with S phase-dependent clastogen induced DNA  
400 damage [129], [130]. The 10mg/kg dose induced 5.32 sister chromatid exchanges (SCE) per  
401 cell, while the 15mg/kg dose induced 6.02 SCEs/cell.

402 When investigating the DNA damage caused by genotoxic carcinogens, different agents  
403 cause unique changes in the genomic sequence of cancer related genes [131]. These  
404 characteristic mutations act as carcinogen specific ‘signatures’, where their assessment is  
405 known as DNA-lesion footprinting or DNA-damage mapping [132]. For example ultraviolet  
406 radiation (UVR) induces dipyrimidine site C to T or CC to TT transitions within the RAS  
407 oncogene and TP53 tumor suppressor gene while polycyclic aromatic hydrocarbons from  
408 tobacco smoke tend to induce G to T transversions [133]. To date, DNA damage mapping has  
409 not been performed to determine whether sanguinarine or black salve result in characteristic  
410 genomic sequence mutations.

411

412 **Table 2: See End of Document**

### 413 *3.3 Contradictory Murine Sanguinarine Carcinogenesis Results*

414 Two experiments have assessed sanguinarines murine carcinogenic potential. One study in  
415 female Swiss albino mice, sought to determine whether sanguinarine could initiate or  
416 promote cancer. Mice exposed to 1,3-dimethylbutylamine (DMBA) and sanguinarine (4.5µM  
417 concentration) as a combination initiator did not develop increased tumor rates compared to  
418 DMBA initiation alone. Mice however, initiated with DMBA and subsequently exposed to  
419 topical twice weekly 1.5µM sanguinarine for 25 weeks did develop earlier tumor onset with

420 mean tumor numbers increasing from 5 to 7.07 [16], suggesting sanguinarine may act as a  
421 tumor promoter.

422 Another study sought to determine whether sanguinarine could protect mice from the effects  
423 of UVB. Female SKH-1 hairless mice had 5 $\mu$ M topical sanguinarine applied as a  
424 pretreatment 30 min pre-UVB exposure or 5 min post-UVB exposure, both groups showed  
425 significantly reduced skin edema, leukocyte infiltration and hyperplasia [17]. There was also  
426 a significant reduction in H<sub>2</sub>O<sub>2</sub> and ornithine decarboxylase (ODC) levels, suggesting  
427 sanguinarine's anti-inflammatory action may reduce oxidative stress with low concentration  
428 topical application. Sanguinarine's mixed cancer promotion and potentially protective effects  
429 in murine models requires clarification by further research, especially as sanguinarine  
430 containing topical therapies are in current use by patients.

431 In addition to these studies that have assessed isolated sanguinarine, two dental  
432 industry-funded studies have explored the carcinogenic potential of *Sanguinaria* extract in  
433 rats [99]. The first study in 50 female and 50 male CD rats at doses up to 60mg/kg body  
434 weight/ day administered by gavage was terminated before the scheduled 104-week study  
435 period was reached due to early high dose female and male control group mortality. An  
436 explanation for rat mortality was not provided, no increased incidence of pre-neoplastic or  
437 neoplastic lesions was reported [99].

438 A follow-up 2-year dietary feeding study administered *Sanguinaria* extract up to 200mg/kg  
439 body weight/ day to 75 male and female Charles River CD rats. The incidence of  
440 fibrosarcomas and subcutaneous fibromas was increased in high dose males (6/75 animals)

441 with high dose females developing an increase in uterine polyps (5/75 animals). These lesions  
442 did not occur in control animals. Despite the difference between the treatment and control  
443 groups, the authors cited the 5% historical incidence of such tumors in control animals [134]  
444 and concluded the fibrosarcomas/ fibromas and uterine polyps seen in the high dose group  
445 were not a consequence of *Sanguinaria* exposure [99]. These studies highlight the lack of  
446 transparency and independent peer-review that may occur when commercially used botanical  
447 products undergo industry funded toxicity testing [135].

#### 448 **4. Human Epidemiological Evidence suggesting Sanguinarine Carcinogenic** 449 **Potential**

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##### 450 *4.1 Maxillary Vestibule Leukoplakia*

451 There is epidemiological evidence linking sanguinarine exposure to the development of  
452 leukoplakia. Viadent, an antibacterial mouth rinse and toothpaste containing 0.3 $\mu$ M  
453 sanguinarine chloride and 0.7 $\mu$ M sanguinarine chloride respectively [136], [137], [138], has  
454 been associated with increased maxillary vestibule leukoplakia [12]. This area normally is  
455 rarely effected by leukoplakia [139]. The anterior portion of the maxillary vestibule has the  
456 highest concentration of intra-oral rinse residue due to a low salivary turnover this mucosal  
457 area has prolonged mucosal product contact [140]. 84% of patients that developed maxillary  
458 vestibule leucoplakia had used Viadent with the average period of use being 4.4 years. The  
459 epidemiological correlation between sanguinarine dental product use and the development of  
460 leukoplakia suggests sanguinarine may induce pre-malignant change in humans.



461 Histologically, Eversole et al [141] showed sanguinaria-associated leukoplakias had  
462 borderline dysplasia in 55% of cases, mild dysplasia in 42.5% of cases and moderate  
463 dysplasia in 2.5% of cases. No lesions showed severe dysplasia with no instances of  
464 carcinoma arising within a sanguinaria-associated leukoplakia. A single case of oral  
465 squamous cell carcinoma that was confluent with a sanguinaria-associated leukoplakia has  
466 been reported. Using sanguinarine-containing products increases the risk for leukoplakia  
467 development 10 fold, which is significantly higher than the 2.5 times risk of leukoplakia  
468 reported from tobacco smoking [142], [143]. The majority of sanguinaria related leukoplakias  
469 appear not to resolve even after Viadent is discontinued suggesting the possibility of a  
470 permanent alteration in the genome of epithelial cell lineages.

471 Based on evidence from molecular profiling, sanguinaria-related leukoplakias appear to lie  
472 between benign and dysplastic keratoses. With p53 expression, p16, proliferating cell nuclear  
473 antigen (PCNA) and cyclin D1 levels being intermediate between the two [144]. While  
474 dysplastic biopsy samples analyzed in this study were over 20 years old and this has been  
475 associated with reduced immunohistochemistry reactivity [145], another study by Eversole et  
476 al. utilizing archived pathology specimens showed similar results. In a further study PCNA  
477 levels were elevated in sanguinaria-associated leukoplakia compared to benign keratoses,  
478 while lower than those in dysplastic lesions [141]. In this analysis, whilst  
479 sanguinaria-associated leukoplakias did not display an elevation of total DNA content, 1.5%  
480 of their cell population were aneuploid, compared to 3.5% for dysplasias, and zero for benign  
481 keratoses. The authors recommended that sanguinaria-associated leukoplakia be classified as

482 mildly dysplastic lesions of uncertain malignant potential.

483 Several studies have sought to determine the mechanism by which sanguinarine may have a  
484 carcinogenic effect on oral mucosa. Sanguinarine's chemical structure shows considerable  
485 homology to polycyclic aromatic hydrocarbons (PAHs) [144]. Many PAHs undergo  
486 metabolic activation by cytochrome P450 to form mutagenic and carcinogenic compounds  
487 [146], or activate the aryl hydrocarbon receptor (AhR) causing an upregulation of AhR  
488 responsive genes that include the prototocarcinogen activating enzymes CYP1A1 and CYP1B1  
489 [147]. There has therefore been interest in determining the interactions of sanguinarine,  
490 cytochrome P450 enzymes and the AhR.

491 A study published in 2005 by Karp et al. suggested that sanguinarine may exert a  
492 carcinogenic effect by activating the aryl hydrocarbon receptor (AhR) in oral human  
493 keratinocytes [148]. These results were however challenged due to the inconsistency of  
494 findings and experimental control failures [149]. A subsequent study found that sanguinarine  
495 at 1 $\mu$ M did not alter CYP1A1 mRNA or protein expression (key features of AhR activation)  
496 in human hepatoma cells, contrary to the proposed sanguinarine AhR carcinogenesis  
497 mechanism [67]. Sanguinarine also failed to induce AhR in H4IIE.luc rat hepatoma cells at a  
498 concentration of 1 $\mu$ M when incubated for 48 h [150].

499 While sanguinarine does not appear to activate AhR, it may be metabolized to a carcinogenic  
500 compound by cytochrome P450 enzymes. CYP1A induction reduces sanguinarine *in vitro* rat  
501 hepatocyte and human hepG2 cytotoxicity, suggesting CYP1A converts sanguinarine into a  
502 less cytotoxic metabolite [151]. This reduced cytotoxic metabolite, may however have greater

503 genotoxicity as evidenced by rat DNA adduct levels increasing with higher microsomal  
504 cytochrome P450 sanguinarine activation [64]. Sanguinarine incubated with human liver  
505 microsomes and NADPH for 150 min failed to generate HPLC detectable metabolites [151].  
506 Serum free human hepatocyte cell cultures exposed to sanguinarine and analyzed with  
507 electrospray ionization quadrupole time-of-flight mass spectrometry, did detect and  
508 unambiguously identify new metabolites. However, their carcinogenic potential is unknown  
509 [78]. Currently the molecular mechanism by which *Sanguinaria* containing dental products  
510 cause oral leukoplakia has not been determined.

#### 511 ***4.2 Sanguinarine Associated Gallbladder Carcinoma***

512 The northern Indian provinces of Uttar Pradesh and Bihar have a high incidence of  
513 gallbladder carcinoma, the disease being the most common biliary tract malignancy in these  
514 regions [152]. Indeed the highest gallbladder cancer incidence rates in the world of 21.5 per  
515 100,000 are to be found in Indian women [153].

516 A number of etiological factors have been investigated in an effort to determine the cause for  
517 these increased rates. Up to 95% of gallbladder cancers have been associated with gallstones  
518 [154], with patients having gallstones >3cm carrying a 10-fold higher risk of gallbladder  
519 cancer [155], [156]. However, gallbladder carcinoma prevalence does not always correlate  
520 with cholelithiasis. In the developed world, 10% of the population has gallstones yet  
521 gallbladder carcinoma only accounts for 0.5% of all malignancies [157]. Chronic  
522 inflammation is another possibility with chronic carriers of *Salmonella typhi* infection having  
523 an 8-fold increased risk of gallbladder cancer [158].

524 Environmental carcinogen exposure has also been explored. Northern Indian regions are  
525 transected by the river Ganges, which provides the main source of irrigation and drinking  
526 water. Carcinogen exposure from the water supply, as Gangetic waters receive industrial  
527 effluents and untreated domestic sewage has been suggested as a possible cause for elevated  
528 gallbladder carcinoma rates [159]. Dietary carcinogen exposure has also been investigated  
529 [159]. Repeatedly boiled sunflower oil, compared to single boiled and fresh sunflower oil has  
530 a significantly increased polycyclic aromatic hydrocarbon (PAH) content [160]. PAHs are  
531 known mutagens and can be carcinogenic. Heating vegetable oil at high temperatures also  
532 results in the formation of toxic compounds [161], [162], [163].

533 *Argemone mexicana* Linn, a herb originally of West Indies origin, grows extensively in  
534 sub-tropical and tropical countries being abundant on roadsides and in wastelands, with its  
535 seeds and oil closely resembling that of mustard seeds allowing their substitution [164].  
536 Argemone oil contains sanguinarine, with a content varying between 0.044 to 0.5% [165].  
537 Sanguinarine accounts for 5% of argemone seed oil alkaloids, dihydrosanguinarine 87%, the  
538 remainder composed of chelerythrine, protopine and berberine [166]. Mustard oil (obtained  
539 from *Brassica* species including *B. rapa* (syn. *campestris*) and *B. nigra*) is used as a frying  
540 and cooking medium in North India [167], [168]. Unscrupulous traders, for economic gain,  
541 often adulterate mustard oil with cheap argemone oil obtained from *Argemone mexicana*  
542 [169], [170].

543 In those with gallbladder carcinoma the gallbladder sanguinarine concentration was 195.18  
544 ng/mg while in those who had cholelithiasis it was 24.05 ng/mg. Blood sanguinarine levels

545 were also reported as elevated in those with gallbladder carcinoma compared to cholelithiasis  
546 being 230.96 ng/ml and 14.01ng/ml respectively [13]. While suggesting a causative link  
547 between sanguinarine tissue exposure and gallbladder carcinoma, the capillary gas  
548 chromatography method used by the authors is unlikely to assess sanguinarine concentration  
549 accurately. Unfortunately, no analytical data were supplied to assist with the scrutiny of this  
550 result. However, with sanguinarines ability to induce DNA damage and reactive oxygen  
551 species it may potentially be a contributing factor in gallbladder carcinogenesis [171].

552

## 553 **5. Current Sanguinarine Carcinogen Status and Future Directions**

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554 The carcinogenic risk of sanguinarine has not been definitively determined due to its  
555 conflicting test results as represented in Figure 2. Sanguinarine has not been included in  
556 carcinogen databases, such as the IARC monographs  
557 (<http://monographs.iarc.fr/ENG/Classification/index.php>), the International Workshop on  
558 Genotoxicity Testing UDS List [172], the 1,547 chemicals of the Carcinogenic Potency  
559 Project Database (CPPD) (<http://toxnet.nlm.nih.gov/cpdb/>), and the 2,300 chemicals of the  
560 US National Toxicology Program  
561 ([http://www.predictive-toxicology.org/data/ntp/original\\_ntp\\_data.txt](http://www.predictive-toxicology.org/data/ntp/original_ntp_data.txt)). Further toxicology  
562 work is required to clarify its status.

## 563 **Figure 2: Summary of Current Sanguinarine Carcinogenic Risk Assessment**

564 (see end of document)

565 A mode of action approach is used to determine a chemical's intrinsic genotoxic properties  
566 [173] by taking all of the available genotoxicity information into account, combining it with  
567 pharmacokinetic, structure activity, ADME (absorption, distribution, metabolism and  
568 excretion) data and other biological responses to determine the risk a chemical may pose to  
569 humans. The mode of action approach assesses whether positive genotoxicity results pose a  
570 risk for human health. Currently this has not been performed for sanguinarine [174].

571 While the majority of genotoxicity testing has assessed compound-induced genetic damage in  
572 blood and liver cells, there is growing interest in using skin for genotoxicity testing [175],  
573 [176], [177]. This alternative is especially relevant for sanguinarine, since skin is the main  
574 target organ for black salve. The tissues used for risk assessment should have the highest  
575 toxicant exposure levels or be a site of biological action. Several skin genotoxicity  
576 assessment methods have been developed including the rodent skin *in vivo* MN assay [175],  
577 *ex vivo* human skin [178] and human reconstructed epidermal models [179].

578 Skin is the largest body organ and acts as a toxin barrier. Epidermal cells from discarded  
579 neonatal foreskin have been found to express 13 of 15 CYP1-4 gene mRNA at detectable  
580 levels [180]. CYP skin metabolism can inactivate reactive compounds having a protective  
581 role [181], [182] but can also activate procarcinogens potentially leading to toxicity and skin  
582 cancer [183], [146]. It is currently unknown whether sanguinarine interacts with cytochrome  
583 p450 metabolism in human skin.

584 The PAH benzo[a]pyrene (BP), which has a chemical structure similar to sanguinarine, is not  
585 toxic itself but is metabolized into mutagenic and carcinogenic metabolites. BP provides a

586 useful test compound to assess the metabolic capability of various skin genotoxicity models.  
587 *Ex-vivo* human skin, cultured normal human keratinocytes and 3D human skin constructs  
588 generate all the major BP derived metabolites in sufficient quantity to induce significant DNA  
589 damage present in the alkaline comet assay [184]. Constructs are however not metabolically  
590 equivalent to normal skin, as they are insufficient for cyclophosphamide metabolic activation  
591 [185] with some constructs found to have lower basal CYP expression levels compared to  
592 human skin biopsies [186].

593 In March 2009 the European Union imposed a ban on the *in vivo* genotoxicity testing of  
594 cosmetics ingredients [187] which stimulated the development of animal free methods for  
595 assessing toxicity. A multilayered human skin construct (EpiDerm) has been developed based  
596 on differentiated foreskin-derived epidermal keratinocytes, that allows both basal and apical  
597 compound exposure to mimic topical therapy application [188]. This construct has metabolic  
598 gene expression similar to that in human skin, with Phase II enzymes more pronounced than  
599 Phase I enzymes [186]. Micronucleus [188] and comet assay [189] protocols have been  
600 developed and are undergoing validity testing. The construct has a low background frequency  
601 of MN and detects lower genotoxin induced MN levels than the Japanese rodent skin MN  
602 assay suggesting it may be the preferred method for testing sanguinarine [190]. False positive  
603 results often generated by significantly cytotoxic compounds and those that induce oxidative  
604 stress in other assays are less likely to occur [191].

605 Fresh *ex-vivo* human skin obtained as excess tissue from cosmetic surgery has provided  
606 another model for genotoxicity testing. Against a range of true negative, misleading positive

607 and true positive genotoxins it was found to have a sensitivity, specificity and accuracy of  
608 89%, 90% and 89% respectively [192]. Human skin has some advantage over reconstructed  
609 epidermal models as all skin cell types are present and the stratum corneum has a normal  
610 function [193] with comparable physiological permeability [194], [195]. To date sanguinarine  
611 and black salve have not been assessed using skin genotoxicity models.

612 At present, ADME factors cannot be determined for black salve, largely due to a lack of  
613 compositional data. Despite toxicity concerns, there has only been a single report in the  
614 literature that analyzed black salve constituents without determining compound  
615 concentrations [196]. According to ICH guidelines exposure to genotoxins or their  
616 degradation products must be limited to 1.5µg/day in order to minimize the risk of  
617 carcinogenicity.

618 Current genotoxicity testing strategies were developed primarily for assessing single  
619 chemicals, and so applying these strategies to herbal therapies that contain multiple bioactive  
620 compounds has been challenging. According to current EU herbal product guidelines (EMEA  
621 2007), the Ames test is the primary endpoint for genotoxicity testing. Compounds that test  
622 negative are accepted as probably non-genotoxic [197]. As discussed, the Ames test as  
623 discussed fails to detect a number of genotoxins with a sensitivity of 60%, while its  
624 specificity of 77% indicates a number of compounds will yield false positive results [198].  
625 The lack of regulatory rigor in natural product genotoxicity testing is of ongoing concern, as  
626 some of the most potent carcinogens known are natural products [199]. Since sanguinarine  
627 containing black salve is currently in clinical use, accurately determining its carcinogenic



628 potential should be a matter of some urgency.

## 629 **6. Conclusion**

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630 Currently we do not know whether sanguinarine or products that contain it are carcinogenic.

631 This is surprising, as sanguinarine has been the subject of a significant body of scientific

632 investigation. Sanguinarine shares molecular mechanisms of action with known carcinogens

633 such as UVA and intercalating DNA agents, structurally resembles PAHs - a chemical class

634 containing carcinogens, has positive *in vitro* and *in vivo* genotoxicity results, has cancer

635 promoter action in a murine model, has a causative role in the development of mouthwash

636 induced human leukoplakia and a suspected role in gallbladder carcinogenesis. Despite these

637 findings other contradictory *in vitro* and *in vivo* results have prevented the carcinogenic

638 classification of sanguinarine.

639 As patients are presently using *S. canadensis* containing topical therapies in areas of UV

640 induced field cancerization, urgent research is needed to determine the carcinogen status of

641 sanguinarine and assess the level of risk. If carcinogenic, patients using black salve may

642 develop subsequent malignancies. If mutagenic, black salve may increase the malignancy of

643 existing skin cancers, making them more invasive and treatment resistant. In this situation, as

644 skin is the target organ of interest, assessing sanguinarine genotoxicity in a bio-equivalent

645 human skin *ex vivo* model may provide the most relevant and accurate assessment of its

646 carcinogenic risk.

647 ***Declaration of Interest:*** The authors report no conflicts of interest.

648

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1176 Table 1: *In vitro* Sanguinarine Genotoxicity Results

Test	Description	Result	Ref
Ames: <i>Salmonella typhimurium</i>	Genetic mutation enables histidine production and bacterial colony growth	Positive	[98]
SOS Chromotest: <i>Escherichia coli</i> PQ37	Assesses lacZ gene damage by measuring its product B-galactosidase	Negative	[100]
Yeast: <i>Saccharomyces cerevisiae</i>	Mutations identifiable by colony colour and growth on certain media	Negative	[200]
Comet Assay	DNA strand breaks appear as a comet tail on agarose gel	Positive	[14]
Micronucleus Assay	Micronuclei chromosome fragments develop during mitosis following genotoxin exposure	Negative	[15]
Gamma-H2AX	Marker of DNA damage localizes to DNA strand break sites	Positive	[58]
GADD45a	Gene activated in response to DNA damage	Untested	
UDS Assay	Measures DNA Nucleotide Excision Repair	Untested	
CHO-HPRT Mutation Assay	Exposure to mutagens establishes HPRT negative CHO cell mutants	Equivocal	[99]

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1179 Table 2: *In vivo* Sanguinarine Genotoxicity Testing

Test	Result	Dose	Comment	References
Micronucleus Assay			Not Tested	
Comet Assay	Positive	2.7mg/kg IP	SG isol Argemone Oil 88% Purity Murine Lymphocyte/ Bone Marrow Cells Both Positive	[121]
	Negative	367 ppm PO	SG isol <i>M. cordata</i> 98.1% Purity 90day ingestion rat lymph/liver neg Plasma SG conc not determined	[125]
CA & SC Exchange Assay	Positive	10mg/kg IP	SG Sigma	[128]

1180 SG= Sanguinarine; CA & SC Exchange Assay= Chromosomal Aberration & Sister Chromatid Exchange Assay

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