

21 *Keywords: almond solids; almond liquid extract; peanut paste; nutshell; mutagenicity;*
22 *genotoxicity; OECD guideline 471; OECD guideline 487.*

23

24 **1. INTRODUCTION**

25

26 Recently there has been an increased interest in the preparation of plant-based alternatives
27 to the animal-based products (meat, dairy, milk ...) to address health-related problems linked
28 to its consumption as well as to contribute to the reduction of the environmental impact that
29 comes with the production of animal-based products. As a result, the food industry faces the
30 dual challenge of developing nutritionally improved products while minimizing environmental
31 impacts along the value chain.

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33 For that purpose, extracts from culinary nuts such as almonds, peanuts, and hazelnuts are
34 widely used as raw materials to produce such alternative products. However, the nut
35 production is in general highly resource-intensive, though still far more environmentally friendly
36 than meat production. For example, the water footprint of Californian almonds is calculated at
37 10240 L of water per kg of kernels over the period 2004-2015, making them one of the most
38 water-demanding crops (Fulton, 2019; Marvinney, 2021). Peanut cultivation, while less water-
39 intensive due to its nitrogen-fixing properties, still contribute to notable fresh-water use and
40 ecotoxicity in production systems (Deepa, 2022). Hazelnut farming, on the other hand,
41 imposes considerable land, fertilizer, and energy demands, with conventional hazelnut
42 systems having higher global warming potential and eutrophication potentials than organic
43 systems, largely driven by fertilizer use and orchard maintenance (Biagetti, 2023).

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45 Besides their intensive resource use, nut processing also generates substantial by-product
46 streams, mainly from shelling and hulling operations (Viegas, 2014). Traditionally, the kernel
47 (with or without skin) has been considered the only valuable and edible component, leaving
48 other fractions, such as shells, underutilized. However, this particular by-product represents a
49 promising source of fibers and functional ingredients that could be incorporated into food
50 formulations, contributing to a more circular and sustainable nut industry.

51 RE-NUT AG (Switzerland) developed and patented an innovative process that allow the
52 processing of in-shell nuts (unshelled, containing the outer hard shell): Almond Solids from
53 Roasted in-shell Almonds (Almond Solids), Almond Liquid Extract from Roasted in-shell
54 Almonds (Almond Liquid Extract) (Laux & Hühn, 2022) and Peanut Paste from Roasted in-
55 shell Peanuts (Peanut Paste) (Laux & Hühn, 2023). This patent-protected technology is now
56 ready to be licensed by nut processors and food companies. Such food ingredients fall under
57 the EU Novel Food Regulation (EU) 2015/2283 (Ververis, 2020).

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59 Given that nut shells lack a documented history of dietary consumption and considering the
60 limited toxicological data available for shell-comprising ingredients, it is necessary to evaluate
61 their safety through established genotoxicity and other testing. Almond and peanut shells
62 consist largely of a lignocellulosic structure and are known to contain phenolic constituents,
63 including flavonoids and condensed tannins like proanthocyanidins (Li, 2018; Queirós, 2020;
64 Tomé, 2023). Polyphenols and tannins are redox-active compounds that can exhibit both
65 antioxidant and pro-oxidant behavior depending on their chemical structure, concentration,
66 and environmental conditions. Under certain circumstances, including metal-catalyzed
67 oxidation, these compounds may form electrophilic quinones and contribute to the generation
68 of reactive oxygen species (ROS). Quinones and ROS have been shown in experimental
69 systems to interact with DNA, leading to strand breaks, oxidative DNA damage, or adduct
70 formation. In addition, lignin-rich plant materials may contain phenolic degradation products
71 that warrant evaluation from a genotoxicity perspective (Bolton, 2016; Chedea, 2012; Stoeva,
72 2025).

73 From a regulatory standpoint, incorporating shell-comprising nut into food ingredients differs
74 from traditional nut consumption and introduces compositional elements with potential
75 biological activity. As such, and consistent with internationally accepted safety-assessment
76 frameworks, the evaluation of genotoxic potential is a critical component of the safety
77 assessment of in-shell nut derived food ingredients prior to market introduction. Conducting
78 standard *in vitro* genotoxicity assays provides assurance that the combined shell, skin, and
79 kernel matrix does not pose a genotoxic hazard under the intended conditions of use, thereby
80 supporting the overall safety determination for these novel food ingredients (EFSA, 2024;
81 Crebelli, 2025).

82
83 Accordingly, the genotoxic potential of these RE-NUT ingredients was assessed in this
84 manuscript in compliance with OECD Test Guidelines 471 (Bacterial Reverse Mutation Test)
85 (Ames, 1975) and 487 (*in vitro* Mammalian Cell Micronucleus Test) (Schmid, 1975). These
86 two *in vitro* tests are aligned with “Tier 1” of the European Food Safety Authority’s approach
87 to genotoxicity testing for novel food ingredients (EFSA, 2012).

88
89 These genotoxicity studies were conducted as part of a comprehensive safety assessment
90 package supporting the use of shell-comprising nut ingredients in food applications, thereby
91 establishing a scientific basis for their inclusion in sustainable, plant-based product
92 formulations.

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94 **2. MATERIAL AND METHODS**

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96 **2.1 Test materials**

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98 The ingredients evaluated in this study were manufactured in Germany by three different
99 partners: Almond Solids from Roasted in-shell Almonds (Almond Solids) by Jäckering
100 Research GmbH, Almond Liquid Extract from Roasted in-shell Almonds (Almond Liquid
101 Extract) by SIG Combibloc Systems GmbH and Peanut Paste from Roasted in-shell Peanuts
102 (Peanut Paste) by ProXES Technology GmbH.

103

104 The production was carried out on behalf of RE-NUT and supervised by RE-NUT to ensure
105 full compliance with the patents held by RE-NUT (Laux, 2022; Laux,2023). The ingredients
106 generated and used for the study are RE-NUT property.

107 Dietary fibers, protein, ash, and fatty acids have been identified as major constituents by
108 compositional analyses along with minor constituents including minerals, polyphenols and
109 tannins. All three ingredients are soluble in water. The detailed analyses of the ingredients
110 Almond Solids, Almond Liquid Extract and Peanut Paste are shown in Table1.

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Table 1. Specifications of Almond Solids, Almond Liquid Extract and Peanut Paste and analytical methods

Compositional Parameters	Almond Solids		Almond Liquid Extract		Peanut Paste	
	Specification	Method	Specification	Method	Specification	Method
Dietary fiber (%)	60-78	VIM (ASU L00.00-18, 1997-01, Ber. 2017-10)	<4	VIM (ASU L00.00-18, 1997-01, Ber. 2017-10)	14 to 35	AOAC 2011.25-M
Fat (%)	10-20	VIM	<12	VIM	40 to 70	VIM; Gravimetry [Weibull-Stoldt]
Protein (%)	≤13	VIM (§64 LFGB L 06.00-7 [Stand 2014-08])	<4	VIM (§64 LFGB L 06.00-7 [Stand 2014-08])	<15	VIM (§64 LFGB L 06.00-7 [Stand 2014-08])
Water (%)	≤8	VIM (§64 LFGB L 06.00-3 [Stand 2014-08])	80-99	VIM (§64 LFGB L 06.00-3 [Stand 2014-08])	<2.0	VIM (§64 LFGB L 06.00-3 [Stand 2014-08])
Ash (%)	≤4	VIM (§64 LFGB L 06.00-4 [Stand 2017-10])	<1	VIM (§64 LFGB L 06.00-4 [Stand 2017-10])	<3.0	VIM (§64 LFGB L 06.00-4 [Stand 2017-10])
Heavy Metals						
Arsenic (mg/kg)	<0.1	} DIN EN 15763:2010 (2010-04), modified	<0.1	} DIN EN 15763:2010 (2010-04), modified	<0.1	} DIN EN 15763:2010 (2010-04), Modified
Lead (mg/kg)	<0.1		<0.1		<0.01	
Cadmium (mg/kg)	<0.05		<0.05		<0.05	
Mercury (mg/kg)	<0.01		<0.01		<0.01	
Microbiological Parameters						
Aerobic plate count (CFU/g)	<10,000	ISO 4833-1	<10,000	ISO 4833-1	<10,000	ISO 4833-1
Yeasts (CFU/g)	<10	ISO 21527-1-modified	<100	ISO 21527-1-modified	<100	ISO 21527-1, Modified
Molds (CFU/g)	<100	ISO 21527-1-modified	<100	ISO 21527-1-modified	<100	ISO 21527-1, Modified
<i>Escherichia coli</i> (CFU/g)	<10	ISO 16649-2-modified	<10	ISO 16649-2-modified	<10	ISO 16649-2, Modified
<i>Salmonella</i> (CFU/25 g)	Negative	AFNOR EGS 38/01-03/15	Negative	AFNOR EGS 38/01-03/15	Negative	AFNOR EGS 38/01-03/15
<i>Listeria monocytogenes</i> (CFU/25 g)	Negative	AFNOR EGS 38/05-03/17	Negative	AFNOR EGS 38/05-03/17	Negative	AFNOR EGS 38/05-03/17
Aflatoxins (µg/kg)						
Aflatoxin B1	<0.1	} DIN EN 14123 (2008-03), modified	<0.1	} DIN EN 14123 (2008-03), modified	<0.1	} DIN EN 14123 (2008-03), modified
Aflatoxin B2	<0.1		<0.1		<0.1	
Aflatoxin G1	<0.1		<0.1		<0.1	
Aflatoxin G2	<0.1		<0.1		<0.1	

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AOAC = Association of Official Analytical Collaboration; AFNOR = Association Française de Normalisation; CFU = colony-forming units; DIN = Deutsches Institut für Normung (German Institute for Standardization); ISO = International Organization for Standardization; LFGB = Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (the German Food and Feed Code); VIM = Validated Internal Method

127 **2.2 Assays**

128

129 The *in vitro* genotoxicity assays reported below were conducted under Good Laboratory
130 Practice and in compliance with the internationally accepted guidelines. Almond Solids and
131 Peanut Paste studies (OECD 471) were performed at Toxi- Coop Zrt., Arácsi út 97 and Ady
132 E. utca 12, 8230 Balatonfüred, Hungary. The Almond Liquid Extract study (OECD 471) was
133 performed at Charles River Laboratories, Hambakenwetering 7, 5231 DD 's-Hertogenbosch,
134 The Netherlands. All OECD 487 studies, for Almond Solids, Almond Liquid Extract and Peanut
135 Paste, were performed at Eurofins Medical Device Testing Munich GmbH, Robert-Koch-
136 Strasse 3a, 82152 Planegg, Germany. All studies were notified to EFSA to support novel food
137 application as per Regulation (EC) No 178/2002, Article 32b.

138 **2.2.1 Bacterial Reverse Mutation Test (OECD TG 471)** The bacterial reverse mutation
139 assays were conducted, employing a range of *Salmonella typhimurium* and *Escherichia coli*
140 strains to evaluate potential mutagenic effects according to the OECD Test Guideline No 471,
141 adopted 21st July 1997/ corrected 26th June 2020 (OECD, 2020); the ICH Guideline S2 (R1):
142 “Genotoxicity testing and data interpretation for pharmaceuticals intended for human use”,
143 dated November 2011 and EPA Health Effects Test Guidelines, OPTTS 870.5100, EPA 712-
144 C-98-247, August 1998.

145 The test concentrations of the ingredients for the bacterial reverse mutation test were based
146 on solubility tests plus concentration range finding tests. No inhibitory effect of the three test
147 ingredients was seen in the concentration range finding tests. For Almond Solids, triplicate
148 concentrations of 5000, 1600, 500, 160, 50, 16, 5 and 1.6 µg/plate were freshly prepared in
149 ultrapure water (ASTM Type 1). For Peanut Paste, the concentrations were from 5000 to 5
150 µg/plate and they were prepared using dimethyl sulfoxide (DMSO). To prepare triplicates of
151 Almond Liquid Extract, concentrations of 5000, 1600, 512,164 and 52 µg/plate and 5000,
152 2800, 1568, 878 and 492 µg/plate were prepared in Milli-Q water in the initial and confirmatory
153 mutation tests. Known mutagens (4-Nitro-o-phenylenediamine (NDP), Sodium azide (SAZ),
154 2-Aminoanthracene (2AA), Methyl methanesulfonate (MMS), 9-Aminoacridine (9AA), 4-
155 nitroquinoline N-oxide (4-NQO), 2-nitrofluorene (2NF) were included in the assays as positive
156 controls, specifically according to the different bacterial strains. All samples were tested with
157 *S. typhimurium* tester strains TA98, TA100, TA1535, and TA1537, and with *E. coli* tester strain
158 WP2 uvrA, both in the absence and presence of S9 liver microsomal fraction prepared from
159 phenobarbital/5,6-benzoflavone-induced rats according to Matsushima (Matsushima, 1976).
160 The colony numbers on the untreated, vehicle control, positive control and the test item treated
161 plates were counted manually by unaided eye and when necessary, with a microscope at 40X
162 magnification.

163 For each of the Almond Solids and Peanut Paste studies (Toxi-Coop), the initial experiment
164 was conducted according to the standard plate incorporation method, with confirmatory
165 assays conducted according to the pre-incubation method. For Almond Liquid Extract (Charles
166 River), the initial experiment was conducted using the plate incorporation method, including a
167 “treat and wash” procedure to limit potential interference from the possible presence of amino
168 acids such as histidine and tryptophan in the test item. The confirmatory experiment used the
169 plate incorporation method as well, including a “treat and wash” phase, but included a higher
170 percent (10% vs 5%) v/v S9 mix. The two different confirmatory assays (the specifics of which
171 vary by testing laboratory) are both in accordance with OECD Test Guideline 471.

172

173 The “Mutation Rate” was calculated by dividing the mean number of the revertants at the test
174 item (or control) treatments by the mean number of revertants of the corresponding vehicle

175 control. The biological relevance of the resulting data was assessed according to the criterion
176 of the OECD guideline (OECD 471).

177 **2.2.2 In vitro Micronucleus Test (OECD TG 487)** The mammalian cell micronucleus test *in*
178 *vitro* was performed using human peripheral blood lymphocytes from healthy donors to assess
179 chromosomal damage according to the OECD Guideline for Testing of Chemicals Section 4,
180 No 487 – “*In Vitro* Mammalian Cell Micronucleus Test, adopted 29 July 2016, corrected 4 July
181 2023” (OECD, 2023). For these assays, concentrations of in-shell nut ingredients were based
182 on the results of preliminary dose selection tests. The concentration of 5000 µg/mL is the
183 highest test concentration to be used in this test system following the recommendation of the
184 corresponding OECD testing guideline 487. As the ingredients demonstrate limited solubility
185 and precipitates at concentrations below 5,000 µg/mL, the selection of the concentrations for
186 evaluation was based on precipitation in each case. The highest concentration selected for
187 micronucleus analysis was the lowest concentration at which precipitation occurs, provided
188 that the precipitate does not interfere with cell scoring. The two immediately lower
189 concentrations that did not result in precipitation were also evaluated.

190
191 For Almond Solids duplicate concentrations of 250, 500, 1000 µg/mL for Almond Liquid
192 Extract, duplicate concentrations of 312.5, 625 and 1250 µg/mL, and for Peanut Paste
193 duplicate concentrations of 50, 100 and 200 µg/mL were incubated for 4 hours without and
194 with metabolic activation with 48 h precultured lymphocytes. The metabolic activation was
195 provided by the addition of phenobarbital/benzoflavone-induced Sprague Dawley rat liver S9
196 prepared with appropriate cofactors at a final concentration of 5% S9 in cultures tested with
197 metabolic activation. Cells were incubated and harvested after 40 hours.

198
199 Similarly, in the long-term treatment assay 250, 500 and 1500 µg/mL of Almond Solids, 78.15,
200 156.3, and 312.5 µg/mL of Almond Liquid Extract, 50, 100 and 200 µg/mL Peanut Paste were
201 incubated, without metabolic activation, in duplicate for 44 hours up to harvest.

202
203 Methylmethanesulfonate (MMS, 50 µg/mL and 65 µg/mL) and Colchicine (0.015 µg/mL and
204 0.4 µg/mL) were used in experiments without metabolic activation (-S9) respectively as
205 clastogenic and aneugenic positive controls. Cyclophosphamide (CPA, 12.5 and 15 µg/mL)
206 was used as clastogenic control in tests that included S9 metabolic activation (+S9). All are
207 known to induce statistically significant increases in micronucleus frequency in this assay.

208
209 Once harvested, the cells were treated for fixation, and cell suspensions were dropped onto
210 glass slides to be dried and then stained before micronuclei analysis, according to the criteria
211 of Fenech (Fenech 2000). Micronuclei were scored blind in at least 2000 cells per
212 concentration, either manually by trained technicians or using the semi-automated scoring
213 Metafer System (Neon-Version: 1.3.8; Metafer-Version: 4.3.6) from Metasystems, Germany

214
215 The Cytokinesis Block Proliferation Index (CBPI) was calculated to estimate cytotoxicity. This
216 index was determined from 500 cells of each culture, by counting mononucleate (c1),
217 binucleate (c2) and multinucleate (c3), according to the following formula $CBPI = (c1 \times 1) + (c2$
218 $\times 2) + (c3 \times 3) / n$ (total cell number).

219 The CBPI from treated and control cells were subsequently used to assess the % of
220 cytotoxicity (cytostasis) which indicates the inhibition of cells growth in treated cultures in
221 comparison to control cultures. The calculation $100 - 100 \times ((CBPI_T - 1) / (CBPI_C - 1))$ gives
222 the % cytotoxicity, $CBPI_T$ being the Cytokinesis Block Proliferation Index of treated cultures
223 and $CBPI_C$ being Cytokinesis Block Proliferation Index of control cultures.

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227 **2.3 Statistical Analysis**

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229 Statistical analyses were deemed unnecessary for the OECD 471 bacterial reverse mutation
230 test, as indicated in the evaluation and interpretation of results chapter of the eponym guideline
231 (OECD 471).

232

233 Regarding the OECD 487 *in vitro* mammalian cell micronucleus assays in human lymphocytes
234 performed to assess chromosomal damage, the nonparametric χ^2 test was used to compare
235 the number of micronucleated cells of each test group with the concurrent vehicle control
236 group with statistical significance set at $p < 0.05$. The χ^2 Cochran-Armitage test for trend was
237 used to examine concentration-related increases at a statistical significance level of 5% ($p <$
238 0.05 , two-sided). Statistical methods were performed using the software GraphPad Prism
239 version 6.

240 **3. RESULTS**

241

242 **3.1 The Bacterial Reverse Mutation Assays**

243

244 The Bacterial Reverse mutation assay detects genotoxic compounds by evaluating the
245 mutation rate occurring in bacterial genomes upon exposure to a test substance. For all three
246 ingredients tested, validity of the performed experiments and controls were checked. The *S.*
247 *typhimurium* and *E. coli* tester strains demonstrated the specific phenotype characteristics and
248 were in conformity with the corresponding historical control data values, as were the negative
249 (ultrapure water and Milli-Q, and DMSO for Peanut Paste, no increase) and positive
250 (diagnostic mutagens, more than 3- fold increase) control conditions. Each S9 fraction used
251 showed the appropriate biological activity.

252

253 In the Almond Solids experiment, the spontaneous revertant counts of the vehicle control
254 (ultrapure water, ASTM Type I) were within the historical control ranges for all tester strains
255 and experimental phases. The positive control mutagens produced the expected, biologically
256 relevant (>3-fold) increases in revertant colonies, confirming assay validity. A slight deviation
257 was noted for the sodium azide (SAZ) control in *S. typhimurium* TA1535 without metabolic
258 activation (-S9), with a mean value of 462 revertant colonies per plate while the laboratory's
259 (Toxi-Coop) historical lower limit is 467. This response is considered acceptable due to a 46-
260 fold increase over the vehicle control. Revertant counts for untreated and DMSO controls were
261 comparable to those of ultrapure water and within historical limits.

262

263 In the Almond Liquid Extract assays, the spontaneous revertant counts of the vehicle control
264 (Milli-Q water) fell within the corresponding historical control ranges for all tester strains.
265 Positive controls were consistent with historical control ranges, except for slight deviations in
266 TA98 and TA1535 (-S9) in the initial test, which had no impact on study validity.

267

268 Similarly, in the Peanut Paste experiment, the spontaneous revertant counts of the vehicle
269 control (DMSO) were within the historical control ranges for all tester strains and experimental
270 phases. Positive control mutagens produced the expected, biologically relevant (>3-fold)
271 increases in revertant colonies, confirming the validity of the assay. Revertant numbers for
272 untreated and ultrapure water (ASTM Type I) controls were consistent with those of DMSO
273 and remained within the historical control ranges.

274

275 In summary, for the three tested ingredients, the validity criteria of the Ames test were fulfilled.
276 Vehicle, untreated, and positive control values were within the corresponding historical control
277 data ranges, confirming the reliability of the test system and the adequate performance of the
278 metabolic activation system (S9 mix).

279

280 It is noteworthy that none of the assays showed evidence of cytotoxicity, bacterial growth
281 inhibition, or precipitation that may disturb the scoring, at any dose tested up to the maximum
282 concentration identified for this test system (5000 µg/plate).

283

284 The results of the initial and confirmatory mutation assays with Almond Solids from Roasted
285 in-shell Almonds (Almond Solids) are summarized in Table 2. No biologically relevant
286 increases in revertant colony numbers were observed in any of the four *Salmonella*
287 *typhimurium* and the *E. coli* tester strains at any tested concentration, neither in the presence
288 nor absence of metabolic activation (S9 mix). Occasional slight increases were noted, but they
289 lacked dose-response relationships and remained within the expected biological variability of
290 the test system. The highest mean revertant count occurred in strain TA100 at 5000 µg/plate
291 (-S9) during the confirmatory test, slightly exceeding the historical control range but remaining

292 well below the threshold for a positive response (mutation rate = 1.72; threshold 2.00)). This
293 isolated increase was attributed to natural variation.

294

295 In both assays testing the mutagenic activity of Almond Liquid Extract from Roasted in-shell
296 Almonds (Almond Liquid Extract), no increases in revertant colonies were observed in any of
297 the four *S. typhimurium* strains or in *Escherichia coli* at any concentration, neither with nor
298 without metabolic activation (Table 3).

299

300 No biologically significant increases in revertant colony numbers were detected in any of the
301 various *S. typhimurium* and *E. coli* strains treated with Peanut Paste from Roasted in-shell
302 Peanuts (Peanut Paste), with or without metabolic activation (Table 4). Minor variations
303 observed during testing were random, showed no concentration-related trend, and remained
304 within the normal biological range. The highest mean revertant count was recorded in strain
305 TA1535 at 16 µg/plate (-S9) during the initial assay (mutation rate= 1.95; threshold= 3.00),
306 which remained within historical limits and far below mutagenic thresholds.

307

308 As none of the three test ingredients produced a concentration-dependent rise in revertant
309 colony numbers, nor did they generate any reproducible or biologically meaningful increases
310 at any concentration tested, no statistical analysis had to be carried out.

311 In conclusion, under the conditions of these studies, Almond Solids, Almond Liquid Extract
312 and Peanut Paste ingredients showed no evidence of mutagenic activity in *S. typhimurium* or
313 *E. coli* tester strains, indicating an absence of genotoxic potential in the bacterial reverse
314 mutation assay according to OECD Guideline 471.

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321 **Table 2. Summary results of the genotoxicity tests with Almond Solids according to OECD Guideline 471. Mean values**
 322 **(Mean) and mutation rates (MR) of controls and Almond Solids at various concentrations in the bacterial reverse**
 323 **mutation assay with (+S9) and without (-S9) metabolic activation using various strains of S. typhimurium and E. coli**

<i>Salmonella typhimurium</i> tester strain																	<i>E. coli</i> WP2uvrA				
TA98				TA100				TA1535				TA 1537									
-S9		+S9		-S9		+S9		-S9		+S9		-S9		+S9		-S9		+S9			
Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR
Initial Mutation Test																					
<i>Negative controls</i>																					
Untreated	16.7	0.93	25.3	0.93	82.0	0.76	80.7	0.96	12.3	1.23	9.3	0.78	7.0	1.11	11.7	1.35	52.0	1.26	47.3	1.15	
DMSO	14.3	1.00	32.7	1.00	-	-	86.3	1.00	-	-	9.00	1.00	6.3	1.00	11.3	1.00	-	-	40.3	1.00	
Ultrapure water	18.0	1.00	27.3	1.00	107.7	1.00	83.7	1.00	10.0	1.00	12.0	1.00	6.3	1.00	8.7	1.00	41.3	1.00	41.3	1.00	
<i>Positive controls</i>	183.0	12.77	1286.7	48.57	523.3	4.86	881.7	10.21	462.0	46.20	150.0	16.67	206.0	32.53	120.0	10.59	489.3	11.83	165.0	4.09	
<i>Almond Solids (µg/plate)</i>																					
5000	24.0	1.33	20.0	0.73	99.0	0.92	104.0	1.24	11.7	1.17	6.7	0.56	4.7	0.74	6.7	0.77	41.7	1.01	46.7	1.13	
1600	16.0	0.89	17.7	0.65	107.3	1.00	88.0	1.05	10.3	1.03	10.3	0.86	7.0	1.11	6.7	0.77	49.3	1.19	41.0	0.99	
500	17.0	0.94	21.0	0.77	76.6	0.71	91.3	1.09	7.7	0.77	10.0	0.83	7.0	1.11	7.3	0.85	49.7	1.20	45.7	1.10	
160	25.0	1.39	19.0	0.70	86.0	0.80	86.0	1.03	8.3	0.83	13.7	1.14	5.0	0.79	8.0	0.92	47.0	1.14	49.7	1.20	
50	20.0	1.11	20.3	0.74	88.0	0.82	80.0	0.96	9.3	0.93	13.0	1.08	7.3	1.16	8.0	0.92	45.3	1.10	51.3	1.24	
16	20.7	1.15	19.3	0.71	82.0	0.76	76.0	0.91	13.7	1.37	9.7	0.81	8.0	1.26	9.3	1.08	45.3	1.10	48.7	1.18	
5	24.7	1.37	20.0	0.73	86.0	0.80	78.3	0.94	10.0	1.00	10.0	0.83	5.3	0.84	9.0	1.04	34.0	0.82	48.7	1.18	
1.6	15.7	0.87	20.7	0.76	83.7	0.78	84.7	1.01	14.3	1.43	13.0	1.08	8.0	1.26	9.3	1.08	43.7	1.06	50.0	1.21	
Confirmatory Mutation Test																					
<i>Negative controls</i>																					
Untreated	11.7	0.74	16.3	1.17	69.3	0.81	70.7	0.91	8.7	0.76	11.3	0.89	6.0	0.72	9.7	0.85	30.3	0.71	43.7	1.00	
DMSO	13.7	1.00	10.7	1.00	-	-	66.7	1.00	-	-	11.0	1.00	7.0	1.00	7.7	1.00	-	-	40.7	1.00	
Ultrapure water	15.7	1.00	14.0	1.00	86.0	1.00	78.0	1.00	11.3	1.00	12.7	1.00	8.3	1.00	11.3	1.00	42.7	1.00	43.7	1.00	
<i>Positive controls</i>	207.0	15.15	1037.3	97.25	644.0	7.49	1005.3	15.08	686.0	60.53	98.3	8.94	437.3	62.48	158.3	20.65	845.3	19.81	207.3	5.10	
<i>Almond Solids (µg/plate)</i>																					
5000	17.0	1.09	20.3	1.45	147.7	1.72	103.3	1.32	14.7	1.29	12.3	0.97	7.0	0.84	11.3	1.00	43.7	1.02	48.3	1.11	
1600	10.0	0.64	19.3	1.38	86.3	1.00	80.3	1.03	11.7	1.03	12.3	0.97	6.0	0.72	10.3	0.91	43.7	1.02	59.0	1.35	
500	13.7	0.87	18.0	1.29	78.3	0.91	76.3	1.03	9.0	0.79	13.0	1.03	6.3	0.76	10.7	0.94	48.3	1.13	49.0	1.12	
160	15.7	1.00	18.0	1.29	73.7	0.86	78.3	1.00	10.7	0.94	12.0	0.95	9.3	1.12	8.0	0.71	44.7	1.05	52.7	1.21	
50	13.7	0.87	19.0	1.36	80.0	0.93	86.3	1.11	11.0	0.97	10.3	0.82	10.7	1.28	10.7	0.94	38.7	0.91	39.7	0.91	
16	15.0	0.96	16.0	1.14	75.7	0.88	79.3	1.03	8.7	0.76	10.0	0.79	7.7	0.92	8.7	0.76	42.0	0.98	38.3	0.88	
5	15.7	1.00	20.0	1.43	77.0	0.90	79.3	1.02	10.0	0.88	14.7	1.16	10.3	1.24	11.3	1.00	39.0	0.91	45.0	1.03	
1.6	15.3	0.98	20.3	1.45	67.3	0.78	81.3	1.04	10.0	0.88	12.7	1.00	9.7	1.16	12.3	1.09	41.0	0.96	47.3	1.08	

MR: Mutation Rate; NPD: 4-Nitro-o-phenylenediamine; SAZ: Sodium azide; 9AA: 9-Aminoacridine; MMS: Methyl methanesulfonate; 2AA: 2-Aminoanthracene; -: Not Applicable. Ultrapure water was applied as vehicle of the test item and the positive control substances SAZ and MMS. The DMSO was applied as solvent of the positive control substances NPD, 9AA and 2AA. The MR obtained at the test item, at the untreated control; furthermore, at SAZ and MMS refers to the ultrapure water. The MR obtained at NPD, 9AA and 2AA refers to DMSO. Positive controls were distributed as follow: NDP (-S9) and 2AA (+S9) for *S. typhimurium* TA98; SAZ(-S9) and 2AA (+S9) for *S. typhimurium* TA100 and TA1535; 9AA(-S9) and 2AA (+S9) for *S. typhimurium* TA1537; MMS (-S9) and 2AA(+S9) for *E. coli* WP2 uvrA.

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Table 4. Summary results of the genotoxicity tests with Peanut Paste according to OECD Guideline 471. Mean values (Mean) and mutation rates (MR) of controls and Peanut Paste at various concentrations in the bacterial reverse mutation assay with (+S9) and without (-S9) metabolic activation using various strains of S. typhimurium and E. coli

	<i>Salmonella typhimurium</i> tester strain																<i>E. coli</i> WP2uvrA							
	TA98				TA100				TA1535				TA 1537											
	-S9		+S9		-S9		+S9		-S9		+S9		-S9		+S9		-S9		+S9		-S9		+S9	
	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR	Mean	MR
Initial Mutation Test																								
<i>Negative controls</i>																								
Untreated	14.0	1.17	22.3	1.08	71.3	1.16	75.7	1.15	7.0	1.11	8.7	0.84	8.7	1.04	6.3	0.83	30.7	1.00	35.0	1.04				
DMSO	12.0	1.00	20.7	1.00	61.7	1.00	66.0	1.00	6.3	1.00	10.3	1.00	8.3	1.00	7.7	1.00	30.7	1.00	33.7	1.00				
Ultrapure water	-	-	-	-	64.3	1.00	-	-	8.00	1.00	-	-	-	-	-	-	35.7	1.00	-	-				
<i>Positive controls</i>	352.7	29.39	1223.3	59.19	499.3	7.76	667.3	10.11	754.7	94.33	149.0	14.42	182.0	21.84	119.0	15.52	615.3	17.25	170.3	5.06				
<i>Peanut Paste</i>																								
<i>(µg/plate)</i>																								
5000	11.7	0.97	19.0	0.92	74.0	1.20	63.7	0.96	7.3	1.16	10.0	0.97	6.7	0.80	9.0	1.17	32.3	1.05	34.0	1.01				
1600	18.7	1.56	17.7	0.85	62.7	1.02	68.3	1.04	7.7	1.21	8.0	0.77	7.0	0.84	10.0	1.30	29.0	0.95	35.7	1.06				
500	14.7	1.22	23.7	1.15	67.0	1.09	71.7	1.09	8.7	1.37	9.7	0.94	9.3	1.12	9.7	1.26	30.3	0.99	37.7	1.12				
160	13.7	1.14	27.7	1.34	66.0	1.07	73.7	1.12	8.3	1.32	9.3	0.90	8.7	1.04	10.3	1.35	34.7	1.13	38.3	1.14				
50	19.0	1.58	22.7	1.10	66.3	1.08	89.0	1.35	9.3	1.47	12.0	1.16	6.7	0.80	8.0	1.04	33.7	1.10	42.0	1.25				
16	12.7	1.06	15.0	0.73	62.0	1.01	73.7	1.12	12.3	1.95	8.3	0.81	8.0	0.96	8.0	1.04	35.7	1.16	42.0	1.25				
5	20.0	1.67	20.0	0.97	59.0	0.96	66.0	1.00	8.0	1.26	10.0	0.97	7.7	0.92	8.3	1.09	32.0	1.04	31.3	0.93				
Confirmatory Mutation Test																								
<i>Negative controls</i>																								
Untreated	17.0	1.04	23.3	1.17	103.0	1.76	99.0	1.26	10.0	0.88	12.0	1.00	7.7	1.21	9.3	1.17	29.3	1.09	39.3	0.94				
DMSO	16.3	1.00	20.0	1.00	58.7	1.00	78.3	1.00	11.3	1.00	12.0	1.00	6.3	1.00	8.0	1.00	27.0	1.00	42.0	1.00				
Ultrapure water	-	-	-	-	75.3	1.00	-	-	11.3	1.00	-	-	-	-	-	-	35.0	1.00	-	-				
<i>Positive controls</i>	579.3	35.47	1262.7	63.13	632.7	8.40	641.3	8.19	795.3	70.18	171.0	14.25	430.7	68.00	104.3	13.04	1132.0	32.34	161.3	3.84				
<i>Peanut Paste</i>																								
<i>(µg/plate)</i>																								
5000	15.7	0.96	18.0	0.90	71.7	1.22	59.0	0.75	10.7	0.94	9.7	0.81	5.7	0.89	6.0	0.75	39.3	1.46	40.3	0.96				
1600	16.7	1.02	16.3	0.82	64.7	1.10	60.3	0.77	9.3	0.82	12.3	1.03	6.7	1.05	6.7	0.83	29.7	1.10	43.7	1.04				
500	17.7	1.08	24.7	1.23	68.0	1.16	87.3	1.11	8.3	0.74	13.0	1.08	7.3	1.16	6.3	0.79	29.7	1.10	43.7	1.04				
160	16.3	1.00	21.7	1.08	64.7	1.10	79.3	1.01	10.7	0.94	13.3	1.11	8.0	1.26	6.7	0.83	30.7	1.14	39.0	0.93				
50	15.0	0.92	22.7	1.13	50.3	0.86	73.3	0.94	11.3	1.00	10.3	0.86	7.3	1.16	7.0	0.88	24.0	0.89	39.0	0.93				
16	15.0	0.92	19.0	0.95	60.7	1.03	71.7	0.91	10.7	0.94	11.7	0.97	7.0	1.11	10.0	1.25	24.3	0.90	45.0	1.07				
5	17.3	1.06	22.0	1.10	62.0	1.06	69.3	0.89	8.0	0.71	15.7	1.31	7.3	1.16	8.7	1.08	24.0	0.89	40.3	0.96				

MR: Mutation Rate; DMSO: Dimethyl sulfoxide; NPD: 4-Nitro-o-phenylenediamine; SAZ: Sodium azide; 9AA: 9-Aminoacridine; MMS: Methyl methanesulfonate; 2AA: 2-Aminoanthracene; -: Not Applicable. DMSO was applied as vehicle of the test item and the positive control substances NPD, 9AA and 2AA. The Ultrapure water was applied as vehicle of the positive control substances SAZ and MMS. The mutation rate obtained at the test item, at the untreated control; furthermore, at NDP, 9AA and 2AA refers to the DMSO. The mutation rate obtained at SAZ and MMS refers to ultrapure water. Positive controls were distributed as follow: NDP (-S9) and 2AA (+S9) for S. typhimurium TA98; SAZ(-S9) and 2AA (+S9) for S. typhimurium TA100 and TA1535; 9AA(-S9) and 2AA (+S9) for S. typhimurium TA1537; MMS (-S9) and 2AA(+S9) for E. coli WP2 uvrA.

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348 **3.2 The *in vitro* Mammalian Cell Micronucleus Test Using Human Lymphocytes**

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350 The test ingredients, Almond Solids, Almond Liquid Extract, and Peanut Paste were
351 investigated in the OECD 487 test for a possible potential to induce micronuclei in human
352 lymphocytes in the absence and presence of metabolic activation.

353

354 Within all three test ingredients, the negative control cultures gave expected results and were
355 within the historical control ranges for the testing facility. For Almond Solids, the
356 micronucleated cell frequencies of the negative controls were within historical limits in the 4-h
357 and 44-h without metabolic activation (-S9) treatments, whereas one value (1.10%) in the 4-h
358 h with metabolic activation treatment (+S9) was slightly above the upper limit defined as
359 1.04%, but it was still considered acceptable for inclusion (Table 5). For Almond Liquid Extract,
360 all negative control frequencies in 4h (+/-S9) and 44-h in absence of S9 fell within their
361 respective historical control ranges (Table 6). Similarly, for Peanut Paste, the negative control
362 frequencies were consistently within the historical ranges across the 4-h (\pm S9) and the 44-h (-
363 S9) treatments (Table 7).

364 The positive controls gave the expected results in all assays. MMS (50 and 65 μ g/mL) and
365 CPA (12.5–15 μ g/mL) produced clear and statistically significant increases in micronucleus
366 frequency, respectively (2.10 - 4.90%) and (2.20 - 2.50%) respectively for MMS and CPA.
367 demonstrating their clastogenic activity. Colchicine, used at 0.015 and 0.4 μ g/mL as an
368 aneugenic control, also induced robust and statistically significant MN responses, from 1.65
369 to 4.65 %. The magnitude and consistency of these increases confirm the responsiveness of
370 the test systems and the proper functioning of the metabolic activation system where
371 applicable.

372 As such, the results of both negative and positive controls validate the reliability of the *in vitro*
373 micronucleus assays conducted for all three test ingredients.

374

375 Across all experimental conditions, Almond Solids did not induce cytotoxicity at levels that
376 would compromise the interpretation of chromosomal damage (Table 5). In the 4-h treatment
377 in absence of metabolic activation (-S9), cytostasis remained below the 30% threshold
378 established by the testing laboratory up to 250 μ g/mL. It should be noted that the OECD 487
379 guideline does not define a threshold for cytotoxicity. At higher concentrations (500–1000
380 μ g/mL), moderate cytostasis was observed, with values ranging from 35% to 47%. In the 44-
381 h without S9, a similar pattern was seen, with cytostasis remaining below or only moderately
382 above the 30% at the 500 and 1500 μ g/mL doses. In presence of S9, in the 4-h treatment,
383 cytostasis clearly stayed below 30%. The higher levels observed were considered to remain
384 within the acceptable range defined by OECD 487 for evaluating genotoxic potential
385 (maximum of 55 +/- 5% cytotoxicity /cytostasis).

386 In any experiment testing Almond Solids, no treatment-related increase in micronucleated
387 cells was detected. In the 4-h without S9, micronucleus frequencies ranged from 0.40% to
388 0.55% through the tested concentrations, all within historical negative-control limits. With S9
389 activation and 4 h exposure, micronucleus frequencies were 0.45–0.60%, again consistent
390 with expected background variation. The 44-h without S9 treatment confirmed the absence of
391 clastogenic or aneugenic effects, with values between 0.50% and 0.90%, comparable to the
392 concurrent control.

393

394 Almond Liquid Extract produced no evidence of cytotoxicity exceeding the threshold
395 compatible with reliable genotoxicity assessment (Table 6). Cytostasis remained below 30%
396 in the 4- and 44-h treatment, regardless of metabolic activation, indicating that all evaluated
397 concentrations were appropriate for interpreting micronucleus formation.

398

399 Micronucleus frequencies following Almond Liquid Extract exposure did not deviate from
400 historical controls. In 4-h without S9 exposure, frequencies varied from 0.55% to 0.90%, all
401 within the established historical interval. In 4-h with S9 activation, frequencies were ranged
402 from 0.55 to 1.05%; only the highest concentration, 1250 µg/mL showed a slight elevation,
403 1.05%, above the upper historical bound set at 1.04%. However, this increase lacked
404 statistical significance and was therefore considered biologically irrelevant. The 44-h exposure
405 in absence of S9 further supported the absence of genotoxic activity, with micronucleus
406 frequencies (0.40–0.80%) falling well within historical variation.

407

408 No excessive cytotoxicity was observed with Peanut Paste in any experimental condition
409 (Table 7). Cytostasis remained below the 30% threshold in the 4- and 44-h, both with and
410 without S9, indicating that all concentrations tested were suitable for assessing genotoxic
411 potential under OECD 487.

412 Peanut Paste exposure did not induce micronucleus formation in the tested conditions. In 4-h
413 without S9 treatment, micronucleus frequencies ranged from 0.20% to 0.45%, values that
414 were within historical negative-control ranges. In presence of S9, frequencies of 0.45 – 0.65%
415 were observed, again consistent with normal background variability. 44-h treatment without
416 S9 results mirrored these findings: micronucleus frequencies following treatment (0.45 –
417 0.65%) remained within historical limits.

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Table 5 : Summary results of the genotoxicity test with Almond Solids according to OECD Guideline 487. Cytotoxicity (Cytostasis) Index, Relative Cell Growth, Micronuclei (MN) frequencies of controls and various Almond Solids concentrations

Treatment	Concentration (µg/mL)	Metabolic activation S9 or +S9	Number of cells evaluated	Cytotoxicity (Cytostasis) (%)	Relative cell growth (%)	MN frequency (%)	Historical control limits Negative control
4-hour treatment							
Culture medium	0		2000	0	100	0.90	C: 0.07% - 1.00 %
Almond Solids	250	-S9	2000	1	99	0.40	
Almond Solids	500	-S9	2000	47	53	0.55	
Almond Solids	1000	-S9	2000	35	65	0.40	
MMS	65	-S9	2000	17	83	2.10*	
Colchicine	0.4	-S9	2000	42	58	3.30*	
Culture medium	0	+S9	2000	0	101	1.10	C: 0.06% - 1.04%
Almond Solids	250	+S9	2000	0 ^a	148	0.45	
Almond Solids	500	+S9	2000	9	91	0.60	
Almond Solids	1000	+S9	2000	6	94	0.45	
CPA	15	+S9	2000	0 ^a	110	2.20*	
44-hour treatment							
Culture medium	0	-S9	2000	0	100	0.90	C: 0.1% - 1.03%
Almond Solids	250	-S9	2000	23	77	0.90	
Almond Solids	500	-S9	2000	38	62	0.90	
MMS	50	-S9	2000	35	65	3.80*	
Colchicine	0.015	-S9	2000	64	36	2.15*	

427 Culture medium, RPMI1640, was applied as solvent of the test item and the positive control substances: methylmethanesulfonate (MMS), colchicine and cyclophosphamide
428 (CPA). Relative Cell Growth : $100 \times ((CBPI \text{ test conc}-1)/(CBPI \text{ control}-1))$, Cytotoxicity (Cytostasis) = $100 - \text{Relative Cell Growth} (\%)$, *: significant increase compared to
429 negative control (χ^2 test , $p < 0.05$), ^a: the cytotoxicity (cytostasis) is defined as 0, when the relative cell growth exceeds 100%.
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Table 6: Summary results of the genotoxicity test with Almond Liquid Extract according to OECD Guideline 487. Cytotoxicity (Cytostasis) Index, Relative Cell Growth, Micronuclei (MN) frequencies of controls and various Almond Liquid Extract concentrations

Treatment							
	Concentration (µg/mL)	Metabolic activation S9 or +S9	Number of cells evaluated	Cytotoxicity (Cytostasis) (%)	Relative cell growth (%)	MN frequency (%)	Historical control limits Negative control
4-hour treatment							
Culture medium	0		2000	0	100	0.75	C: 0.07% - 1.00 %
Almond Liquid Extract	312.5	-S9	2000	0 ^a	109	0.90	
Almond Liquid Extract	625	-S9	2000	0 ^a	104	0.75	
Almond Liquid Extract	1250	-S9	2000	0 ^a	108	0.55	
MMS	65	-S9	2000	0 ^a	106	3.85*	
Colchicine	0.4	-S9	2000	67	33	2.65*	
Culture medium	0	+S9	2000	0	100	0.55	C: 0.06% - 1.04%
Almond Liquid Extract	312.5	+S9	2000	0 ^a	115	0.70	
Almond Liquid Extract	625	+S9	2000	5	95	0.55	
Almond Liquid Extract	1250	+S9	2000	0 ^a	104	1.05	
CPA	12.5	+S9	2000	36	64	2.20*	
44-hour treatment							
Culture medium	0	-S9	2000	0	100	0.75	C: 0.10% - 1.03%
Almond Liquid Extract	78.15	-S9	2000	0 ^a	123	0.60	
Almond Liquid Extract	156.3	-S9	2000	11	89	0.80	
Almond Liquid Extract	312.5	-S9	2000	0 ^a	132	0.40	
MMS	50	-S9	1274	37	63	3.76*	
Colchicine	0.015	-S9	2000	61	39	1.65*	

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Culture medium, RPMI1640, was applied as solvent of the test item and the positive control substances: methylmethanesulfonate (MMS), colchicine and cyclophosphamide (CPA). Relative Cell Growth : $100 \times ((CBPI \text{ test conc}-1)/(CBPI \text{ control}-1))$, Cytotoxicity (Cytostasis) = $100 - \text{Relative Cell Growth (\%)}$, *: significant increase compared to negative control (χ^2 test , $p < 0.05$), ^a: the cytotoxicity (cytostasis) is defined as 0, when the relative cell growth exceeds 100%.

441 **Table 7: Summary results of the genotoxicity test with Peanut Paste according to OECD Guideline 487.**
 442 **Cytotoxicity (Cytostasis) Index, Relative Cell Growth, Micronuclei (MN) frequencies**
 443 **of controls and various Peanut Paste concentrations**
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 445

Treatment							
	Concentration (µg/mL)	Metabolic activation S9 or +S9	Number of cells evaluated	Cytotoxicity (Cytostasis) (%)	Relative cell growth (%)	MN frequency (%)	Historical control limits Negative control
4-hour treatment							
Culture medium	0		2000	0	100	0.65	C: 0.07% - 1.00 %
Peanut Paste	50	-S9	2000	0 ^a	102	0.45	
Peanut Paste	100	-S9	2000	0 ^a	118	0.25	
Peanut Paste	200	-S9	2000	0 ^a	104	0.20	
MMS	65	-S9	2000	0 ^a	121	4.90*	
Colchicine	0.4	-S9	2000	62	38	4.65*	
Culture medium	0	+S9	2000	0	100	0.30	C: 0.06% - 1.04%
Peanut Paste	50	+S9	2000	5	95	0.65	
Peanut Paste	100	+S9	2000	0 ^a	110	0.45	
Peanut Paste	200	+S9	2000	0 ^a	104	0.50	
CPA	12.5	+S9	2000	13	87	2.50*	
44-hour treatment							
Culture medium	0	-S9	2000	0	100	0.25	C: 0.10% - 1.03%
Peanut Paste	50	-S9	2000	0 ^a	121	0.65	
Peanut Paste	100	-S9	2000	12	88	0.45	
Peanut Paste	200	-S9	2000	0 ^a	101	0.55	
MMS	50	-S9	2000	37	63	4.70*	
Colchicine	0.015	-S9	2000	57	43	1.90*	

446 *Culture medium, RPMI1640, was applied as solvent of the test item and the positive control substances: methylmethanesulfonate (MMS), colchicine and cyclophosphamide*
 447 *(CPA). Relative Cell Growth : 100 x ((CBPI test conc-1)/(CBPI control-1)), Cytotoxicity (Cytostasis) = 100 - Relative Cell Growth (%), *: significant increase compared to*
 448 *negative control (χ^2 test , p<0.05), ^a: the cytotoxicity (cytostasis) is defined as 0, when the relative cell growth exceeds 100%.*
 449

450 In summary, across all three test ingredients and experimental conditions, statistical analyses
451 supported the descriptive interpretation of the micronucleus data. For Almond Solids, Almond
452 Liquid Extract, and Peanut Paste, the non-parametric χ^2 test revealed no statistically
453 significant elevation ($p < 0.05$) in the frequency of micronucleated cells at any concentration,
454 neither in the presence nor absence of metabolic activation.

455
456 An additional statistical analysis set was performed for testing the hypothesis of concentration
457 dependencies, through the χ^2 Cochran-Armitage test, on each series of doses, in each
458 experiment, and for each of the three ingredients. A positive trend, i.e. statistically significant
459 concentration-related increase in micronucleated cells frequency, was defined as $p < 0.05$.

460
461 This specific χ^2 test for trend demonstrated no evidence of a dose-related increase in
462 micronucleus formation for any of the three ingredients (Table 8). These findings confirm that
463 the slight fluctuations observed among individual dose groups reflected normal biological
464 variability of the test system rather than treatment-related effects.

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**Table 8. Summary results of the χ^2 Cochran-Armitage testing
concentration-related increase in micronucleated cells frequency**

Genotoxicity OECD 487 test	Treatment Time [h]	Almond Solids P value	Almond Liquid Extract P value	Peanut Paste P value
without metabolic activation (- S9)	4	0.7155	0.4286	0.3103
with metabolic activation (+ S9)	4	0.7397	0.1772	0.6647
without metabolic activation (- S9)	44	0.2461	0.2615	0.6937

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Collectively, the statistical evaluations corroborate the absence of clastogenic or aneugenic activity for all three shell comprising nut ingredients, Almond Solids, Almond Liquid Extract and Peanut Paste, under the experimental conditions of the *in vitro* micronucleus assay according to OECD Guideline 487.

480 **4. DISCUSSION**
481

482 The present studies were conducted to evaluate the genotoxic potential of three shell
483 comprising nut ingredients—Almond Solids, Almond Liquid Extract, and Peanut Paste—
484 produced using the patented RE-NUT in-shell processing technologies. These ingredients
485 represent a new category of shell-containing nut fractions with no established history of dietary
486 use. The studies presented are the first *in vitro* genotoxic studies reported on in-shell nut
487 ingredients.

488 The results of the bacterial reverse mutation tests (OECD 471) provide clear evidence that
489 none of the three products induce gene mutations in *S. typhimurium* or *E. coli* tester strains.
490 All assay validity criteria were satisfied, including expected performance of the positive and
491 negative controls, adequate strain functionality, and proper metabolic activation. In all the
492 tested concentrations, revertant colony numbers showed no biologically meaningful increases,
493 whereas an occasional minor fluctuation was consistent with natural assay variability. The
494 bacterial reverse mutation assay was conducted following recognized international standards,
495 employing a range of *S. typhimurium* and *E. coli* strains well documented to evaluate potential
496 mutagenic effects. This test showed no induction of gene mutations neither in the presence
497 nor in the absence of metabolic activation.
498 These findings demonstrate the absence of mutagenic activity in a highly sensitive screening
499 system and contribute to the evidence that supports the genotoxic safety of these three shell-
500 comprising nut ingredients for potential use in food applications.

501
502 The complementary evaluations using the *in vitro* micronucleus assay in human lymphocytes
503 (OECD 487) further support the lack of genotoxicity. For all three ingredients, micronucleated
504 cell frequencies remained within historical control intervals through all exposure conditions.
505 No statistically significant increases were observed, and no concentration-related trends
506 emerged. Cytostasis values remained within the recommended ranges for reliable
507 interpretation, confirming that the doses tested were appropriate and not confounded by
508 excessive cytotoxicity. The expected robust responses of clastogenic and aneugenic controls
509 demonstrated the sensitivity of the test system. Collectively, these results show that Almond
510 Solids, Almond Liquid Extract, and Peanut Paste do not induce chromosomal damage or
511 aneugenicity under the conditions of the assays.

512 Together, the outcomes of the two independent genotoxicity assays form a consistent and
513 coherent body of evidence indicating that the three studied shell-comprising nut ingredients
514 lack mutagenic, clastogenic, or aneugenic potential. This integrated assessment aligns with
515 the toxicological profiles broadly recognized for edible nut components and provides the
516 essential safety data needed for shell-comprising fractions, which have only a limited, if any,
517 history of consumption. These findings therefore contribute meaningfully to the scientific basis
518 required for a GRAS determination and/or an EFSA Novel Food assessment, supporting the
519 conclusion that the tested ingredients do not present a genotoxic hazard under their intended
520 conditions of use.

521 To our knowledge, this work represents the first systematic assessment of genotoxic potential
522 for shell-comprising nut ingredients. The consistently negative results obtained across the *in*
523 *vitro* genotoxicity assays indicate no genotoxic activity for the tested ingredients under the
524 conditions evaluated. In line with internationally accepted tiered testing strategies, these
525 findings support a Tier 1 conclusion of no genotoxic concern, with no further genotoxicity
526 testing warranted. This outcome provides important support for the regulatory safety
527 assessment of in-shell nut ingredients. It is worth to note that for a close but different product,

528 Pecan shell fiber, these same tests have also demonstrated an absence of genotoxicity in
529 another type of shell nut (U.S. FDA, 2016).

530

531 **5. CONCLUSION**

532

533 The genotoxic potential of Almond Solids, Almond Liquid Extract, and Peanut Paste produced
534 using the patented RE-NUT process was systematically evaluated using two internationally
535 recognized *in vitro* systems, adhering to OECD Test Guidelines 471 and 487. Under the
536 experimental conditions applied, none of the tested ingredients induced gene mutations in
537 bacteria or chromosomal damage in human lymphocytes, either in the presence or absence
538 of metabolic activation. These results provide consistent and complementary evidence
539 supporting the absence of genotoxic concern for the tested ingredients. In conclusion, the
540 results reinforce the assumption that the three nut ingredients containing shells are non-
541 genotoxic *in vitro*. Since ingredients that come from nut fractions have no history of
542 consumption in human diets, the current studies offer crucial Tier 1 genotoxicity information
543 according to EFSA guidelines for assessing the safety of novel foods. The information
544 provided here creates a strong scientific foundation for the ongoing toxicological assessment
545 of in-shell nut components and endorses their safe application in food products when used as
546 intended.

547

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556

557 **COMPETING INTERESTS**

558

559 Roland Laux and Christian Zimmermann are employees of RE-Nut AG; Tatiana Avellaneda
560 was an employee of Re-Nut AG at the time of the study. Tilo Hühn is a named co-inventor on
561 patents related to the in-shell nut processing technologies evaluated in this study and is
562 affiliated with a university institution. The university affiliation did not influence the design,
563 conduct, interpretation, or reporting of the studies. The other authors declare no conflict of
564 interest.

565

566 **AUTHORS' CONTRIBUTIONS**

567

568 This work was carried out in collaboration among all authors. Authors TA, ST, and HV
569 contributed to the conceptualization of the study. Authors PCB, GH, RH, YK, GK, AV, and CZ
570 developed the methodology, and author CZ was responsible for producing and selecting the
571 study products. Investigation was performed by PCB, GH, RH, YK, GK, and AV. Authors TA
572 and SP, prepared the original draft of the manuscript. Review and editing were conducted by
573 RL, TA, PCB, RH, TH, YK, SP, ST, AV, and HV. Author RL was responsible for funding
574 acquisition. All authors reviewed and approved the final version of the manuscript.

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