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## Dr. Johnstone et al. Reply to Dr. Elmrayed

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We thank Dr. Elmrayed and colleagues<sup>1</sup> for highlighting clinical cautions in using broad-spectrum micronutrients to treat attention-deficit/hyperactivity disorder (ADHD) in children, in particular manganese (Mn) levels. We appreciate the opportunity to provide additional information and rationale for the vitamin and mineral doses contained in the studied formula.

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We agree that dose is important; as Paracelsus said, “The dose makes the poison.”<sup>2</sup> All minerals and fat-soluble vitamins have a toxic level. Prior to starting this study, we obtained oversight and consultation from 2 government agencies: the US Food and Drug Administration (IND#127832) and Health Canada (Control #207742). Risk information was reviewed by institutional review boards at 3 institutions.

Although Table 3 in the original paper by Johnstone *et al.*<sup>3</sup> reports the ingredient amounts from a single capsule, we also provide ingredient doses for 9 and 12 capsules, along with Recommended Dietary Allowance/Adequate Intake (RDA/AI) and Lowest Observed Adverse Effect Level (LOAEL), in Table S2, available online.<sup>3</sup> The published paper stated that doses were between RDA and Tolerable Upper Intake Level (UL), an oversight for which we apologize. More accurately, doses of most nutrients were between RDA/AI and LOAEL, except for magnesium and niacin, which were above LOAEL for participants taking the maximum dose (9 capsules for 6- to 8-year-olds, 12 capsules for 9- to 13-year-olds), as noted in the published protocol.<sup>4</sup> Seven others (copper, manganese, selenium, zinc, vitamin A [retinyl palmitate], vitamin B<sub>6</sub> [pyridoxine], and vitamin B<sub>9</sub> [folate]) were above UL, but below LOAEL. These data are clarified in Table 1<sup>5-8</sup> showing doses for these 9 nutrients and their ULs and LOAELs, and also documented as a correction.<sup>11</sup>

Although 9 of the 36 nutrients in the researched formula were dosed at levels above the UL, only 4 were listed in Supplement 1, available online,<sup>3</sup> along with the following rationale:

Dietary intake guidelines from the US Institute of Medicine state, “Although members of the general population should be advised not to routinely exceed the UL, intake above the UL may be appropriate for investigation within well-controlled clinical trials. Clinical trials of doses above the UL should not be discouraged ... as long as these trials employ appropriate safety monitoring of trial subjects. In addition, the UL is not meant to apply to individuals who are receiving a high dose of a nutrient under medical supervision. The UL is typically derived to apply to the most sensitive members of the general population. For this reason, many members of the population may regularly consume nutrients at or even above the UL without experiencing adverse effects.”<sup>12</sup>

Dr. Elmrayed raised the concern of manganese being consumed in a “likely-toxic dose range.” For participants 6 to 8 years old consuming 9 capsules, the dose equals 7.2 mg/d (UL: 3 mg), and for those 9 to 13 years old taking 12 capsules, 9.6 mg/d (UL: 6 mg). Although these doses are above the ULs, they are below the LOAEL of 15 mg/d and even the No Observed Adverse Effect Level (NOAEL) of 11 mg/d.<sup>9</sup>

Manganese is an essential mineral and necessary as a cofactor for many enzymes, for example, in metabolism, gluconeogenesis, and the antioxidant defense network.<sup>10,13</sup> Several factors affect Mn absorption and/or excretion, including interactions with calcium, magnesium, and iron. High intakes of these minerals (contained in the micro-nutrient formula) decrease absorption of Mn.<sup>14</sup> Manganese absorption also depends on exposure method: inhaled or by contaminated water source differs from ingestion, with toxicity typically related to environmental exposures.<sup>13</sup> Furthermore, as a guard against Mn’s

potential toxicity, the body maintains tight homeostasis through intestinal absorption control and biliary excretion.<sup>9</sup>

Dr. Elmrayed cited the O’Neal and Zheng paper<sup>15</sup> regarding concern for a “known association” between dietary Mn and ADHD. Albeit comprehensive, that reference confines potential associations between ADHD and Mn to infant formula, not child dietary intake. To our knowledge, there is no established association between higher dietary Mn intake and risk of developing ADHD. Preliminary evidence from 4 studies of blood and hair Mn showed slightly higher Mn in children with ADHD than in healthy controls,<sup>16</sup> but was contradicted by a more recent study showing the opposite.<sup>17</sup>

Regarding “blood safety measures,” to monitor potential toxicities, all US participants had a comprehensive metabolic panel before enrollment and at week 8 to check liver functioning, among other values, as poor liver metabolism may impair elimination of manganese. Comprehensive metabolic panel results were not clinically significant by physician review. We also investigated changes in plasma mineral levels following 8 weeks of supplementation in 77 US participants. Data showed a baseline average manganese concentration of 0.68 mg/L (range, 0–2.10 mg/L). The average change after 8 weeks in the micronutrient group was not significantly different from the change in the placebo group (data presented at AACAP 2022). However, plasma Mn levels may not be an ideal biomarker, as Mn has a 2-hour half-life in blood.<sup>15</sup> Reassuringly, adverse events were not significantly greater with micronutrients than with placebo, even in the corrected table.<sup>18</sup>

Regarding the potential for “serious long-term health effects,” safety data for up to 5 years of micronutrient use, including blood values, have been published for children and adults.<sup>19</sup> In addition, a systematic review of micro-nutrient safety, including blood values (n = 144) and adverse event reports (n = 157), found only mild, transitory AEs not attributable to toxicity.<sup>20</sup>

As with any treatment, risks and benefits exist that clinicians consider for each patient. Individuals should consult with their doctor and should be monitored during treatment. Given current data, the benefit–risk ratio continues to appear favorable for micronutrients. Further research is needed on longer-term safety and optimal long-term doses in children.

## Supplementary Material

Refer to Web version on PubMed Central for supplementary material.

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TABLE 1

Tolerable Upper Intake Level (UL) and Lowest Observed Adverse Effect Level (LOAEL) of Vitamins and Minerals Dosed Above UL for Children 4 to 13 Years Old, and Safety Rationale

Nutrient	Dose in 9 capsules	UL in children 4 to 8 years	Dose in 12 capsules	UL in children 9 to 13 years	LOAEL	Safety rationale for use under supervision in a clinical trial
Copper	5.4 mg	3 mg	7.2 mg	5 mg	10 mg <sup>a</sup>	Copper is above the UL, but below the No-Observed-Adverse Effect-Level (NOAEL) for adults of 10 mg. <sup>9</sup> The formula also contains zinc, which competes with copper for absorption.
Magnesium <sup>b</sup>	450 mg	110 mg	600 mg	350 mg	360 mg	UL is set because of concerns regarding diarrhea. A 2019 meta-analysis found that children with ADHD had lower Mg levels than those without. <sup>5</sup>
Manganese	7.2 mg	3 mg	9.6 mg	6 mg	15 mg	The LOAEL was not based on actual clinical adverse effects, but on "increases in serum manganese concentrations after 25 days of supplementation." "There are no reports of manganese toxicity in children and adolescents." <sup>10</sup>
Selenium	0.15 mg	0.15 mg	0.20 mg	0.28 mg	0.91 mg	"The most frequently reported features of selenosis (chronic toxicity) are hair and nail brittleness and loss.... Intake above the UL may be appropriate for investigation within well-controlled clinical trials ... the UL is not meant to apply to individuals who are receiving selenium under medical supervision." <sup>7</sup>
Zinc	36 mg	12 mg	48 mg	23 mg	60 mg	The primary safety concern is that higher levels may result in an imbalance with copper. As the formula also contains copper, this concern is reduced. <sup>9</sup> The formula includes zinc and copper in an accepted ratio (range, 5–10:1). <sup>9</sup>
Vitamins						
B <sub>3</sub> (niacin) <sup>a</sup>	67.5 mg	15 mg	90 mg	20 mg	50 mg	The 2 forms of niacin are grouped together (nicotinic acid and niacinamide [also called nicotinamide]) and UL set low to prevent skin flushing from nicotinic acid. No reports of skin flushing to date with this formula, which contains niacinamide. The IOM acknowledges that the 2 forms are clearly different. <sup>8</sup>
B <sub>6</sub> (pyridoxine)	52.5 mg	40 mg	70 mg	60 mg	500 mg	Neurological issues were reported in 1 adult study at a dose of 500 mg/d. <sup>8</sup> No cases of toxicity have been found with B <sub>6</sub> administration in children.
B <sub>9</sub> (folate)	0.60 mg	0.4 mg	0.80 mg	0.6 mg	5 mg	The UL was set to prevent masking a B <sub>12</sub> deficiency; the formula contains B <sub>12</sub> , so the risk of masking B <sub>12</sub> deficiency is low. <sup>8</sup>
Vitamin A (as retinyl palmitate)	1.27 mg <sup>c</sup>	0.9 mg	1.73 mg	1.73 mg <sup>c</sup>	6.46 mg	There are limited case reports of hypervitaminosis (symptoms related to cerebrospinal fluid pressure: headache vertigo, double vision) above 6 mg/d in young children; the risk of exceeding UL appears to be small. The IOM acknowledges vitamin A intake above UL can be appropriate in controlled clinical trials. <sup>9</sup>

IOM = Institute of Medicine.

<sup>a</sup>Magnesium and niacin doses were above the LOAEL; the others were above the UL, but below the LOAEL.

<sup>b</sup>Copper has a NOAEL for adults; no LOAEL reported.

<sup>c</sup>Dosages for Vitamin A are calculated in milligrams of Retinol Activity Equivalents.