Importance of HMPC Community Monographs and Community List Entries for the Marketing Authorisation and Registration of Herbal Medicinal Products in Europe: Phytotherapeutical Association's Perspective on Implementation

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Community Herbal Monographs and List Entries ...

- ... are helpful for individual applications
- ... facilitate mutual recognition
- ... contribute to harmonisation of scientific assessment
Scope of the monographs

"Qualitative and quantitative composition"

- All products in the market covered?
- Esp. for the so-called "other herbal preparations": drug extract ratio, extraction solvent, if possible pharmacopoeia
- "Note for Guidance on the declaration"
- Important for an unambiguous interpretation of the dosage recommendations
Therapeutic indications

Maintain the principle of CD 2001/83/EC

- Double-tracked system of well-established medicinal use and traditional use
- In principle both options for each preparation: marketing authorisation or registration
- Depending on individual data for the herbal preparation: well-established medicinal use or traditional use
"Herbal Hierarchy"

Marketing authorization

New substance/new indication
Major claims

Medium claims

Minor claims

Registration

Traditional hmp

Food supplement

A

B

C

T

FS

"for treatment, prevention of...

"traditionally used"

"physiological effect"
Justification of "well-established use"

- "At least one controlled clinical study" (incl. e.g. post-marketing study) "of good quality"
- If clinical experience is well-documented and conclusive (human) pharmacological data available: case-by-case assessment
- HMPC Guideline on the Assessment of Clinical Safety and Efficacy (adopted September 2006)
Therapeutic indications

- Preferably "well-established medicinal use" as far as justified by clinical experience and pharmacological data
- e.g. Thymi herba, Melissae folium, Foeniculi fructus, Passiflorae herba
- Comments submitted by interested parties (e.g. AESGP, ESCOP, Kooperation Phytopharmaka)
Appropriate indications for traditional use

- In case well-established use is not accepted, appropriate indications for traditional use should be found.
- Level of indications?
- Example UK: "Symptoms of the menopause, such as hot flushes, night sweats, and temporary changes in mood (such as nervous irritability and restlessness)"
Therapeutic indications

- Example UK: "Prevention of migraine headaches" (previously diagnosed by a doctor)
- Example Germany: "Support of the cardiac/circulatory function"
- Example Germany: "Support of the kidney function"
- "Level" of indications not harmonised
- Differences will remain?
Borderline to food supplements

- Appropriate indications needed for the traditional use
- Current activities of the European food industry
- Proposed claims for food supplements
- Based e.g. on ESCOP monographs (!)
- Evaluation by EFSA
Claims for food supplements

Proposals of the European food industry

- Cascara sagrada: "Improves intestinal motility"
- Cucurbita pepo: "Contributes to the normal function of bladder and prostate"
- Echinacea purpurea: "Supports the natural defences of the body / supportive during common cold and infections"
Claims for food supplements

Proposals of the European food industry

- Ginkgo biloba: "Maintenance and preservation of normal cognitive performance from the age of 50"
- Hypericum perforatum: "Contribution to emotional balance and general wellbeing"; "Helps to get over depressions"
Dosage recommendations

General issue

- Should take into account information given in chapter 2 (composition)
- E.g., HMPC draft monograph Thymi herba: dosage recommendation should be in line with the clinical studies performed with thyme herb liquid extract DAB and the German Commission E monograph
Dosage recommendations

Children's dosage

- Should take into account the long-term use of preparations in different age groups and the experiences of paediatric physicians
- E.g., HMPC monograph Foeniculi fructus
- Use in children from 0-12 years can be documented
- Market importance of herbal tea and preparations such as fennel honey
Preclinical safety data

Genotoxicity issue

- Note for Guidance on the non-clinical documentation for herbal medicinal products published
- Genotoxicity data should only be requested in case of a specific safety concern
- Supplementary guideline on the interpretation of results appreciated
Genotoxicity issue

- Restrict the need for genotoxicity testing of herbal preparations to cases where there is really a cause for concern
- No higher requirements as compared to known substances of chemical origin
- No further work on list entries on e.g. *Valerianae radix* and *Lini semen*
HMP turnover in Euro per capita and year in Europe (2005)

Source: IMS/BAH calculation
Perspectives

Monographs and list entries

- Important tools for facilitation of marketing authorisation/registration and mutual recognition
- Well-established or traditional use depending on individual data
- Achieving harmonised assessment criteria
- Harmonisation must not mean: minimum indications and maximum risk information
Thank you !