HMPC COMMUNITY MONOGRAPHS AND LIST ENTRIES: NATIONAL REGULATOR’S PERSPECTIVE ON IMPLEMENTATION

Heribert PITTNER

AGES PharmMed, Austria

Graz, 2 September 2007
Directive 2004/24

• Issued on 31 March 2004
• Member States should comply with this directive by 30 October 2005
• As of 30 June 2007, three Member States had not yet implemented Directive 2004/24 into national law
# THMP applications and registrations as of 30 June 2007

<table>
<thead>
<tr>
<th></th>
<th>Applications</th>
<th>Registrations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>Belgium</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Denmark</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Germany</td>
<td>27</td>
<td>4</td>
</tr>
<tr>
<td>Spain</td>
<td>6</td>
<td>-</td>
</tr>
<tr>
<td>Finland</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>France</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Greece</td>
<td>12</td>
<td>-</td>
</tr>
<tr>
<td>Italy</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Latvia</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Lithuania</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Netherlands</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Poland</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Sweden</td>
<td>7</td>
<td>-</td>
</tr>
<tr>
<td>Slovenia</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Slovakia</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>26</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>114</strong></td>
<td><strong>13</strong></td>
</tr>
</tbody>
</table>
HMPC Meetings
2004 - 2007

September 2004 – August 2007:
18 HMPC Meetings

8 Meetings of the HMPC Drafting Group on
Lists and Monographs (November 2004 –
January 2006)

9 Meetings of the MLWP
(Since March 2006)
Why so few THMPs until now?

Although HMPC has created several guidelines on THMPs during the last years, there is still a lot of uncertainty both in industry and among regulators.
“Well established use“ or “Traditional use“?

• When a monograph / list entry is available, this will help to decide on the adequate procedure
• When no monograph is available:
  - Extent and quality of the clinical documentation?
  - Indications (Prescription only or OTC?)
What to do?

• Request for registration as THMP for which a full marketing authorisation has been given previously

• A full authorisation was granted for a HMP in one MS, while in another MS a request for registration as THMP is submitted.
What to do? (Contd.)

• The traditional use for 30 years has been demonstrated for two single herbal preparations, but not for the combination.

• Implementation of Directive 2004 to “old“ HMPs until 2011: Immediate action or “Wait and see?“
Queries

• “It is both too difficult and too expensive to submit the results of the pharmaceutical tests in full length”
• Request for mutagenicity data for THMPs
Queries (contd.)

• Safety data for herbal medicinal products with a tradition outside Europe (e.g. TCM, Ayurvedic Medicine)?

• Are indications such as “prostatic hypertrophy” or „diabetes mellitus“ possible for registrations as THMPs?
Advantages of List Entries for THMPs:

When a list entry has been finalised:
- Safety has to be accepted by all national authorities
- Plausibility of traditional use has to be accepted by all national authorities
- Possibility of community procedures
Advantages of Monographs for HMPs with Well-established use

• Although HMPC monographs are not legally binding to national authorities, by the time existing monographs will harmonise the requirements for authorisation / registration and the different product informations

• In case of a referral, HMPC (and CHMP) will decide in line with the content of the monographs adopted by HMPC
Theoretical risks for registrations of THMPs:

Until now:
- No request to HMPC on the adequacy of long-standing use
- Not one MRP for any THMP
- Not one referral to EMEA in relation to a THMP
- Not one referral to EMEA in relation to other products containing herbal substances
Conclusions:

1. HMPC monographs and list entries are of importance and of value for the authorisation / registration and harmonisation of HMPs in Europe.
2. It is essential that more regulatory experience is gained with THMPs.
3. Member States should encourage their HMPC / MLWP delegates to take over rapporteurships for herbal monographs and list entries.
Conclusions (contd.)

4. Regulators in the NCAs should handle applications for authorisation of HMPs with well-established use and for registration of THMPs in a pragmatic and flexible way.

5. Applicants should not only consider the risks, but also the chances given by Directive 2004/24.