



1 29 September 2015
2 EMA/HMPC/427510/2015
3 Committee on Herbal Medicinal Products

4 **Concept paper on the revision of the “Guideline on the**
5 **assessment of clinical safety and efficacy in the**
6 **preparation of Community Herbal monographs for Well-**
7 **established and of Community herbal monographs/entries**
8 **to the Community list for traditional herbal medicinal**
9 **products/substances/preparations”**

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Agreed by Monograph and List Working Party (MLWP)	July 2015
Adopted by Committee on Herbal Medicinal Products for release for consultation	29 September 2015
Start of public consultation	16 October 2015
End of consultation (deadline for comments)	31 January 2016

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Comments should be provided using this [template](#). The completed comments form should be sent to hmpc.secretariat@ema.europa.eu

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Keywords	Herbal medicinal product, clinical safety, efficacy, traditional use registration, marketing authorisation, European Union herbal monographs
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15 **1. Introduction**

16 In 2006, the “Guideline on the assessment of clinical safety and efficacy in the preparation of
17 Community herbal monographs for well-established and of Community herbal monographs/entries to
18 the community list for traditional herbal medicinal products/substances/preparations”
19 (EMA/HMPC/104613/2005) was published. The purpose of the guideline was to harmonise the
20 assessment of efficacy and safety when preparing monographs for well-established and traditional
21 herbal medicinal products in order to full fill tasks according to Article 16 h (3) and Article 16 f (1) of
22 Directive 2001/83/EC as amended by Directive 2004/24/EC. Guideline EMA/HMPC/104613/2005 has
23 now been available for approximately 10 years and a considerable practical experience has been
24 gathered during the preparation of more than 150 monographs.

25 **2. Problem statement**

26 In principle, the content of the guideline is still valid, but an update of the document to current
27 standards is required taking into account advances over the last 10 years as well as established
28 practice and legal interpretations. Developments and details in the assessment methodology have so
29 far been mainly reflected in template revisions (e.g. Assessment report template
30 EMA/HMPC/418902/2005 Rev. 5, monograph template EMA/HMPC/107436/2005 Rev. 7), but also
31 other public documents such as the ‘Public statement on the interpretation of therapeutic indications
32 appropriate to traditional herbal medicinal products in Community herbal monographs
33 (EMA/HMPC/473587/2011).’

34 **3. Discussion (on the problem statement)**

35 Besides a general update of the document and a revision of the text to adequately describe the current
36 practice of the HMPC and MLWP, there are three major points for consideration:

- 37 • Following legal interpretation by the European Commission, a public statement was issued by the
38 HMPC in 2011. The public statement concerned therapeutic indications acceptable for traditional
39 herbal medicinal products “after exclusion of serious conditions by a medical doctor” e.g lower
40 urinary tract symptoms related to benign prostatic hyperplasia. This information should be included
41 in the guideline.
- 42 • In 2014, a template with guidance notes for the development of uniform assessment reports was
43 issued by the HMPC. The template introduced a detailed list of characteristics that should be
44 assessed for each clinical study included in the assessment report. This list of study characteristics
45 should be included and discussed in the guideline.
- 46 • The present guideline contains currently no details for specific considerations and data
47 requirements related to use in special population groups to be considered during establishment of
48 monographs for HMPs. Specific aspects on use in the e.g. paediatric and adolescent populations
49 should be added to the guideline.

50 **4. Recommendation**

51 HMPC recommends revising the “Guideline on the assessment of clinical safety and efficacy in the
52 preparation of Community herbal monographs for well-established and of Community herbal
53 monographs/entries to the community list for traditional herbal medicinal products/substances/
54 preparations” as indicated above. In addition to the alignment with other documents and current

55 practice, other points based on assessment experience but also the use of monographs in national and
56 European procedures may be considered during the revision aiming for improved clarity and
57 transparency in some particular aspects of the assessment process.

58 **5. Proposed timetable**

59 The draft revised guideline is expected to be released for 3 month public consultation in 2Q-3Q 2016.
60 After the external consultation the final guideline is expected to be available within 6-9 months.

61 **6. Resource requirements for preparation**

62 Two rapporteurs will be involved in drafting the revision. The draft is expected to be discussed at three
63 to four meetings of the MLWP and at two to three meetings of the HMPC. If necessary the ORGAM DG
64 of the HMPC will be involved for check of procedural aspects and consistency with other guidance
65 documents.

66 **7. Impact assessment (anticipated)**

67 The guideline is primarily intended for use by HMPC and MLWP, but it also has a direct impact on the
68 work of NCAs, applicants and interested parties. The monographs prepared according to the guideline
69 will have an impact on public health as it will influence the approval and availability of (T)HMPs in the
70 EU.

71 **8. Interested parties**

72 Before finalisation, the guideline will be made available for comments by interested parties during the
73 period of public consultation. Comments, both on the concept paper but also the draft revised guideline
74 will be taken into account. The revision is anticipated to support the understanding of the HMPC
75 assessment serving as background document to facilitate comments on individual draft EU herbal
76 monographs and supporting documents during public consultations.

77 **9. References to literature, guidelines, etc.**

- 78 • Guideline on the assessment of clinical safety and efficacy in the preparation of Community herbal
79 monographs for well-established and of Community herbal monographs/entries to the Community
80 list for traditional herbal medicinal products/substances/preparations; [EMEA/HMPC/104613/2005](#)
- 81 • Template for Assessment report for the development of European Union herbal monographs and
82 European Union list entries [EMA/HMPC/418902/2005 Rev. 5](#)
- 83 • Template for a European Union herbal monograph [EMA/HMPC/107436/2005 Rev. 7](#)
- 84 • Public statement on the interpretation of therapeutic indications appropriate to traditional herbal
85 medicinal products in Community herbal monographs [EMA/HMPC/473587/2011](#)