

22 November 2023
EMA/HMPC/996/2024
Committee on Herbal Medicinal Products (HMPC)

AESGP hearing¹ at HMPC meeting, November 2023

Report

List of representatives from the Association of the European Self-Medication Industry

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1. RWD/RWE for herbal medicinal products

The AESGP emphasised the growing interest in the regulatory use of real-world data throughout the medicinal products' lifecycle (e.g., for monitoring safety and effectiveness in special populations) and the related work performed by the AESGP working group on RWD-RWE and Herbal medicines (e.g., literature search and analysis of results – focus on review of 2 articles). In this regard, the AESGP presented two specific studies on RWD-RWE for herbal medicinal products (studies from two different areas: 1. effectiveness; 2. safety), followed by the outcome of the verification carried out to determine whether the EMA's criteria were fulfilled in those studies (1. reliability; 2. relevance; 3. extensiveness; 4. coherence; 5. timeliness). For both studies, some limitations and strengths were identified, and a few related questions were presented for further analysis by the HMPC.

The HMPC acknowledged the growing interest in RWD/RWE studies also for the establishment and revision of EU herbal monographs. With specific regard to the paediatric use of herbals, a reflection paper on data recommendations for (traditional) herbal medicinal products used in children/adolescents is being prepared by HMPC (in cooperation with PDCO). Moreover, a RWD/RWE research project related to the safe use of herbals in children is foreseen (in cooperation with EMA's TDA-RWE) as part the HMPC work plan 2024. Finally, the challenges posed by borderline products and the possible bias between medical prescription and patient use in RWD/RWE studies to retrieve usage data related to traditional herbal medicinal products were emphasised.

2. EU herbal monographs on Sennae

AESGP presented a report related to the change of analytical methods in the Ph. Eur. monographs on Sennae (from a spectrophotometric method to a HPLC method). It was pointed out that the dosage recommendations of the EU herbal monographs on Sennae are based on the previous spectrophotometric method, which could lead to different results regarding the content of hydroxyanthracene derivatives, and therefore such a change pose regulatory consequences for herbal

¹ The meeting was held remotely.

medicinal products on the EU market. Some pharmaceutical companies carried out a collaborative trial in an attempt to deduce a conversion factor between the two analytical methods, the results of which are presented in this report. In this regard, the AESGP proposed that the HMPC consider the recommendation that, using the HPLC method, hydroxyanthracene derivatives are usually quantified 10% lower than those obtained using the spectrophotometric method. In addition, the possible regulatory consequences for MA holders have been emphasised, if the current scenario pertains.

The HMPC recognised this topic and that it is on the agenda for discussion the following day after the AESGP's hearing (see the Minutes for the HMPC meeting on 20-22 November 2023).

3. Extract combination of herbal substances

The AESGP highlighted its proposal submitted last year with considerations to combine herbal extracts which do not have a EU herbal combination monograph established by HMPC but individual monographs. The background of the AESGP's proposal explains that based on the options to combine herbal teas in accordance with the herbal tea combination monograph it could also be possible to combine herbal extracts for which individual monographs (including the extracts) exist.

The HMPC acknowledged that the Committee is still working on this topic (as per HMPC work plan 2023), including the possible revision of the guideline on the clinical assessment of fixed combinations of herbal substances/herbal preparations, and also the possibility to establish a shortlist of fixed combination products with a long market presence in Member States suitable for the establishment of EU herbal combination monographs. On the HMPC side, it was expressed that no major changes should be expected as far as combinations are concerned.

4. Review of the variation legislation

The AESGP presented its position on the ongoing revision of the Variation Regulation (Commission Regulation (EC) No 1234/2008) and identified some changes needed to the Variations Classification Guideline in particular for herbal medicinal products. In this regard, the need for a more level playing field between classification for herbals and chemical APIs was highlighted. The variation system should also more level automation and digitalisation so that simple changes can be made via updating the SPOR database. It was also requested to introduce the possibility of downgrading variations that have no impact on quality, safety, and efficacy on a risk-based approach, if justified by MAH (e.g., when revising the Variations Classification Guideline, to add a condition which allows downgrading whenever possible). As for the benefits of downgrading variations, the AESGP highlighted that this possibility enables Competent Authorities to focus on substantial issues, reduces the administrative burden for authorities and industry, adds to the flexibility of the system, and strengthens a proportionate way of assessment based on a risk-based approach. Moreover, it was emphasised that the variations legislation framework should be able to leverage the continuity of supply. Finally, a few related questions were presented for further analysis by the HMPC.

The HMPC recognised that experience with variations to the terms of marketing authorisations does not fall within the Committee's remit, but rather within the Member States' Competent Authorities. In addition, it was emphasised that the HMPC is not directly involved in the ongoing revision of pharmaceutical legislation, including Variation Regulation and Variations Classification Guideline.

5. Any other business

The AESGP and the HMPC highlighted the importance of these regular meetings, which represent an opportunity to renew dialogue on common interests in the field of (traditional) herbal medicinal products.