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Committee on herbal medicinal products (HMPC)

Reflection paper on the reasons and timelines for revision of final Community herbal monographs and Community list entries

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[1] Update of section 3.3.
[2] Update of sections 2 and 3.3.1

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1. Introduction (background)

One of the major tasks of the HMPC is to prepare a draft list of herbal substances, preparations and combinations thereof for use in traditional herbal medicinal products (hereafter referred to as "the Community list" or "the list" and to establish Community herbal monographs for traditional herbal medicinal products and for well-established herbal medicinal products (Article 16f(1)and Article 16h(3) of the Community code (1)).

If an application for traditional use registration relates to a herbal substance, preparation or a combination thereof contained in the list, the data specified in Article 16c(1)(b)(c) and (d) do not need to be provided (i.e. details of authorisation or registration or refusal to grant authorisation or registration, evidence of long standing use and bibliographic review of safety data).

Community herbal monographs for the application of both the traditional use and well-established use could serve as a basis for simplified registration or bibliographical marketing authorisation applications.

The HMPC and the European Commission pointed out in their respective reports (2, 3) that the monographs adopted by the HMPC need to be periodically updated through a procedure to be put in place for retrieving and evaluating new data from the literature. The systematic revision and updating processes are essential in order to prevent Community herbal monographs from becoming outdated.

The same procedure should be established for the Community list entries as implied in Article 16f(3). When a Community list entry is concerned, the European Commission will be informed accordingly.

2. Problem statement

The HMPC in 2007 compiled an inventory of over 200 herbal substances for assessment (4) and the EMA publishes regular updates on the number of monographs/list entries that have been published or are under assessment, as well as the number of Rapporteurs[3] who have been appointed for new assessment works (5).

Because of constant scientific progress and evolution of regulatory frameworks, monographs/list entries should be re-evaluated in a continuous process. The current situation in the HMPC shows that there are limited resources to fulfil both the establishment and the revision of monographs/list entries. The timelines for such revision will therefore be determined by the HMPC, taking into account priority activities and resources.

The aim of this reflection paper is to identify the criteria/reasons to trigger the revision of Community herbal monographs and/or Community list entries and the associated timelines.

3. Reasons to trigger the revision and associated timelines

In principle, the Rapporteur in charge of the revision of a monograph and/or list entry will be the Committee member, who did the primary assessment. When this is not possible, the HMPC will appoint a new Rapporteur.

The proposed amendments to the Community herbal monographs and/or Community list entries together with its public consultation will be considered when adopting the timetable for revision taking into consideration the urgency of the matter.

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3.1. Immediate review

3.1.1. Safety

An immediate revision of an existing Community herbal monograph and/or Community list entry can be initiated by the HMPC following pharmacovigilance actions resulting from assessment at national or European level.

A revision of an existing monograph and/or list entry can also be triggered by new safety data (e.g. safety data provided by interested parties or Member States) or pharmacovigilance data. The new data will be assessed and an assessment report prepared by the Rapporteur that will substantiate the need for and extent of changes in the monograph and/or list entry. The timelines will be determined depending on the urgency of the matter.

3.1.2. Referrals

As part of the outcome of a referral to the HMPC, the Committee can include in its opinion what its position is regarding the need to revise relevant monographs and/or list entries taking into consideration the required action agreed for the specific herbal medicinal product(s) subject of the referral. The timelines for such revision will be defined in the context of the referral procedure.

3.1.3. Data on the use in children

New safety or clinical data from studies in the paediatric population can trigger the revision of an existing Community herbal monograph and/or Community list entry.

3.2. Systematic review

The need for revision will be considered every 5 years in order to ensure that Community herbal monographs and Community list entries are up to date (scientific state of the art).

Four years after the publication of a final monograph and/or list entry, the HMPC secretariat should start a call for new scientific data (literature published after the release of the final documents within the EMEA website), in accordance with the relevant procedure.

Assessment will start after compilation of new documents by the Rapporteur. The assessment of the new data should be finalised before the end of the 5 years period.

The Rapporteur will include amendments to the relevant sections of the initial AR, in relation to the additional documents made available since the primary assessment and will make a proposal to introduce changes to the monograph and/or list entry as applicable.

3.3. Review for specific reasons

3.3.1. Scientific and consistency

A review led by the Rapporteur in a timeframe shorter than the above-mentioned 5-year review can be agreed by the HMPC in the following cases:

- where (intense) research activities led to scientifically relevant publications/data

In particular, when identified, newly published genotoxicity data will be assessed by the Rapporteur rapidly, with a view to checking if a list entry can be established. When the new data support the establishment of a list entry, the procedure in place shall be followed, which will include the adoption

by the HMPC of a revised assessment report. In cases where a list entry cannot be established, the assessment and its conclusions will be integrated at the next 5-year review/revision of the monograph and supporting documents.

- to ensure consistency (i.e. within Therapeutics Groups) or for editorial changes

The timelines will be determined by the HMPC depending on the nature and urgency of the matter, taking into account MLWP priorities and in consultation with the MLWP Chair. Assessment will start after compilation of new documents by the Rapporteur.
The Rapporteur will include amendments to the relevant sections of the initial AR, in relation to the additional documents made available since the primary assessment and will make a proposal to introduce changes to the existing monograph and/or list entry as applicable.

The assessment should be finalised in accordance with the agreed timetable.

3.3.2. Regulatory practice

A revision jointly led by the Rapporteur and an HMPC member, in a timeframe shorter than the above-mentioned 5-year review, can be agreed by the HMPC in the following case:

- where the regulatory practice in a Member State triggers the need for revision. A Member State via its HMPC member may bring to the attention of the Committee any decision taken at national level that, in its view, has an impact on a final Community herbal monograph and/or Community list entry. The HMPC member should propose changes in the relevant documents to the HMPC for consideration and provide any supporting data.

The timelines will be determined by the HMPC depending on the nature and urgency of the matter and the need for a public consultation on the changes introduced will be decided on a case-by-case basis. Once the revision is agreed by the HMPC, the Rapporteur and the HMPC member will work together on the amendments to relevant sections of the monograph/list entry, AR and other related documents as appropriate.
The revision should be finalised in accordance with the agreed timetable.

The HMPC will assess the need to revise other monographs that may be affected by the revision.

Definitions

Community list entry = document whose purpose is to provide structured information, including information laid down in Article 16f(1) of Directive 2001/83/EC as amended, relating to specific herbal substances or herbal preparations or combinations of substances and preparations from a given plant[4] for use in traditional herbal medicinal products.

Community herbal monograph = document whose purpose is to provide a scientific summary of all data available on the safety and efficacy of a herbal substance/preparation intended for medicinal use, as referred to in Article 16h(3) of Directive 2001/83/EC as amended.

References (scientific and / or legal)

1. Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal product for human use, as amended

[4] It will be indicated if more than one plant is used and if hybrids are also used.

2. HMPC Status report on the implementation of the provisions of chapter 2a of Directive 2001/83/EC as amended by Directive 2004/24/EC as regards traditional herbal medicinal products - October 2006, Final (EMEA/HMPC/187219/06)
http://www.emea.europa.eu/htms/human/hmpc/hmpcstatus.htm

3. Report on the experience acquired as a result of the application of the provisions of Chapter 2a of Directive 2001/83/EC (introduced by Directive 2004/24/EC) on specific provisions applicable to traditional herbal medicinal products.
http://ec.europa.eu/enterprise/pharmaceuticals/pharmacos/docs/doc2007/2007_05/herbals_draft_report_2007_05_29.pdf

4. Inventory of herbal substances for assessment (EMEA/HMPC/494079/2007)
http://www.emea.europa.eu/pdfs/human/hmpc/49407907en.pdf

5. Overview of status of HMPC assessment work – Priority list (EMEA/HMPC/278067/2006)
http://www.emea.europa.eu/pdfs/human/hmpc/27806706en.pdf