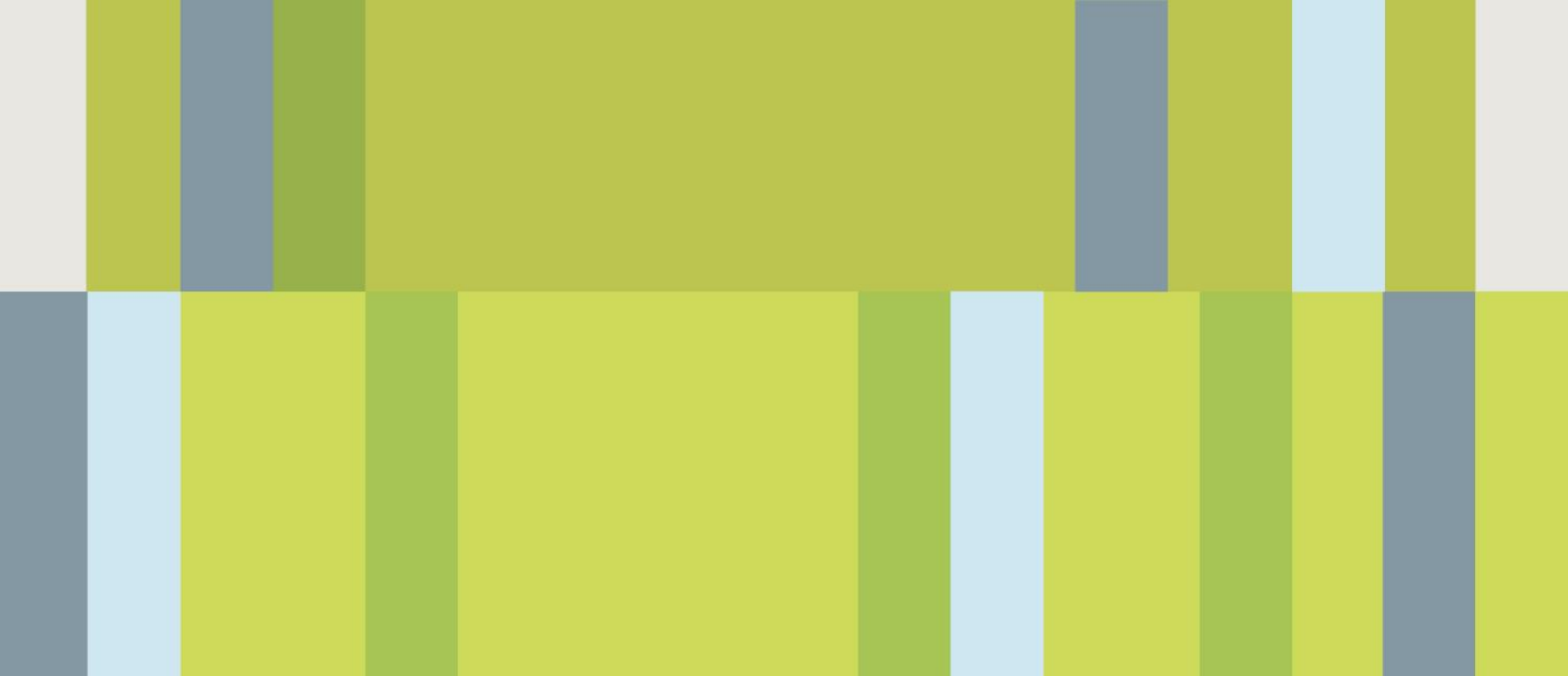




Herbal medicinal products – an area of patient involvement?

Steffen Bager, HMPC member

Herbal medicinal products in Europe

Legislation:

- Traditional herbal medicinal products
- Well established use herbal medicinal products

Procedures to market access:

- National authorisation/registration
 - No EMA centralized procedure

Classification:

- Mostly OTC products.
 - Several Pharmacy only, a few Rx products

Borderline issues:

- Confusion by patients and consumers between medicinal products and food supplements, medical devices

Product Information

- Friends, media, packages, pharmacy, doctors



Traditional Herbal Medicinal Products

EU Legal Framework

30.4.2004

EN

Official Journal of the European Union

L 136/85

DIRECTIVE 2004/24/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 31 March 2004

amending, as regards traditional herbal medicinal products, Directive 2001/83/EC on the Community code relating to medicinal products for human use

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty establishing the European Community, and in particular Article 95 thereof,

Having regard to the proposal from the Commission ⁽¹⁾,

Having regard to the opinion of the European Economic and Social Committee ⁽²⁾,

Acting in accordance with the procedure laid down in Article 251 of the Treaty ⁽³⁾,

and an acceptable level of safety and are not eligible for a marketing authorisation. To maintain these products on the market, the Member States have enacted differing procedures and provisions. The differences that currently exist between the provisions laid down in the Member States may hinder trade in traditional medicinal products within the Community and lead to discrimination and distortion of competition between manufacturers of these products. They may also have an impact on the protection of public health since the necessary guarantees of quality, safety and efficacy are not always provided at present.

- (4) Having regard to the particular characteristics of these medicinal products, especially their long tradition, it is desirable to provide a special, simplified registration procedure for certain traditional medicinal products. However, this simplified procedure should be used

Herbal Medicinal Products

Marketing Authorisation/Registration

1. 'Normal' marketing authorisation application [Article 8(3)]

- Quality documentation
- Non-clinical documentation
- Clinical documentation



2. 'Well-established use' marketing authorisation application [Article 10a]

- Quality documentation
- Non-clinical documentation
- Clinical documentation



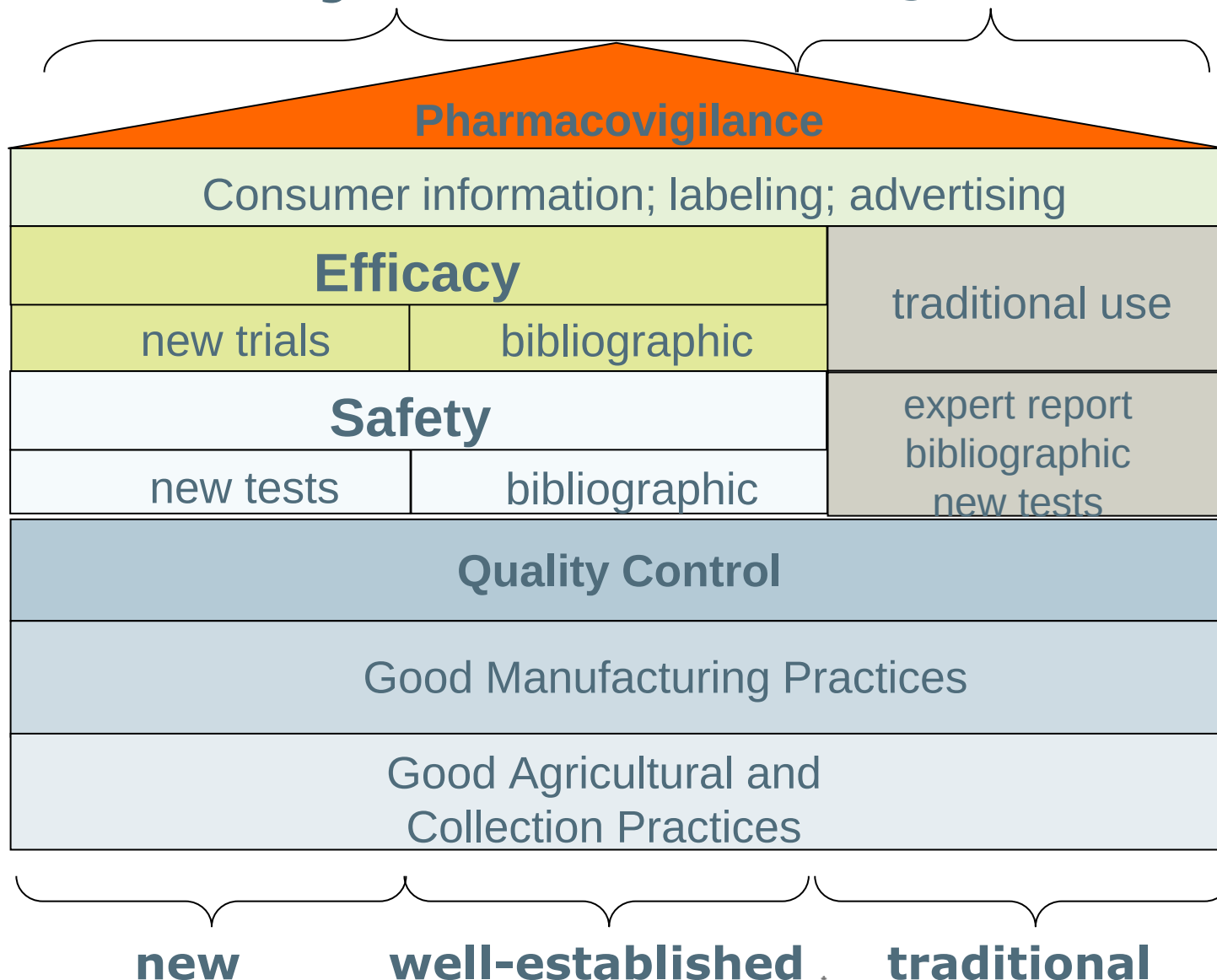
3. 'Traditional use' marketing registration [Article 16a]

- Quality documentation
- Non-clinical documentation
- Clinical documentation



Marketing Authorisation

Registration



Traditional herbal medicinal products – only for self-medication

- Indication(s) appropriate – minor diseases
- **Without the supervision of a medical practitioner for diagnosis, prescription or monitoring of treatment**
- Only oral use, external use and/or inhalation
- Sufficient data on the traditional use to prove that the product is not harmful and that pharmacological effects or efficacy are plausible on the basis of long-standing use and experience (HMPC monograph e.g.)
- Clinical studies not required
- Specified time of traditional use (30/15 years)

Indication and therapeutic areas **not** possible for Traditional herbal medicinal products

Examples:

- Diabetes
- Inflammatory bowel diseases
- Cancer
- Schizophrenia or other mental diseases
- Severe infectious diseases, like
 - HIV, AIDS, TBC, influenza, pneumonia, malaria

HMPC Raison d'être

Tasks according to Directive 2004/24

- The Committee should carry out tasks concerning the **simplified registration and authorisation** of medicinal products as provided for in this Directive (whereas 9)
- Its tasks should relate in particular to **establishing Community herbal monographs** relevant for the registration as well as the authorisation of herbal medicinal products (whereas 9)
- Perform the tasks arising from 16c(1) and (4) and 16 d (**referrals**) (16h1a)

HMPC composition

- 28 MS representatives
- Co-opted members: 5 (Clinical Pharmacol., Paediatrics, non-clin. Pharmacol., Toxicology, Family medicine)
- Pharmacists.: 24, Chem.: 1, Pharmacologists: 2
- Medical doctors: 6
- NCA: 28 , Academia: 6, Medical practitioner: 1
- Patient representatives: 0
- Observers: 1 EDQM, 1 Eur. Com., Albania, Bosnia-Herzegovina, Kosova, Fyrom. Montenegro, Serbia, Turkey



HMPC Mission: Ensuring harmonized procedures and framework for herbal medicinal products in EU

- **Core deliveries:**

- EU Union monographs
- EU List entries
- Scientific, regulatory and organizational Guidelines on HMP
- Scientific opinions on questions related to herbal medicinal products
- Guidance to interested parties from outside EU



Overview of HMPC assessment on herbals and herbal monographs.

May 2015

	First assessment	Revision
Final monographs	140	16
Finalized List Entries	13	1
Final public statements	13	n.a.
Assessment cancelled	12	n.a.
Quality documents	16-18	
Non-clinical documents	4	
Clinical documents	4	
Multidisciplinary	13	

HMPC Mission: Ensuring harmonized procedures and framework for herbal medicinal products in EU

Other deliveries:

Cooperation with European and international partners

Cooperation with other committees

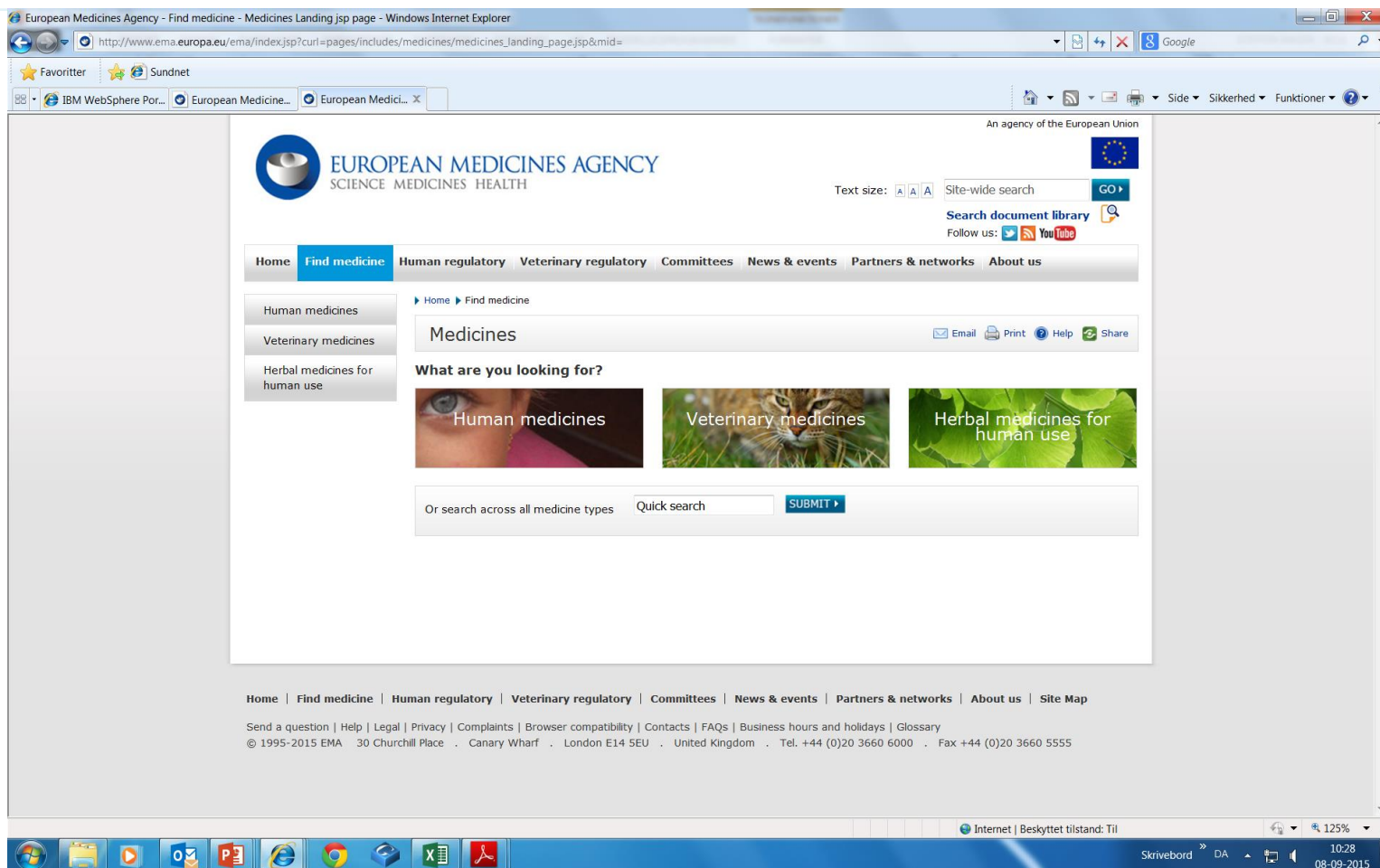


Future deliveries:

ARSP in cooperation with stakeholders and Medicines inf. Section

Strengthening the links with other authorities and with stakeholders and patients

HMPC Monographs – including, assessment reports, references and comments from the public consultation



HMPC monographs – a common reference point


EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

28 January 2015
EMA/HMPC/321097/2012
Committee on Herbal Medicinal Products (HMPC)

European Union herbal monograph on *Ginkgo biloba* L.,
folium

Final

Discussion in Working Party on European Union monographs and list (MLWP)	May, Sep, Nov 2012 Jan, Mar, May, Jul, Sep, Nov 2013
Adoption by Committee on Herbal Medicinal Products (HMPC) for release for consultation	28 January 2014
End of consultation (deadline for comments)	15 June 2014
Rediscussion in MLWP	Sep, Nov 2014
Adoption by HMPC	28 January 2015

Keywords	Herbal medicinal products; HMPC; European Union herbal monographs; well-established medicinal use; traditional use; <i>Ginkgo biloba</i> L., folium; Ginkgo folium; Ginkgo leaf
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BG (bulgarski): Гинко, лист CS (čeština): jinanový list DA (dansk): Ginkgoblád DE (Deutsch): Ginkgoblätter EL (elliniká): ΓΙΓΚΟΥ ΦΥΛΛΟ EN (English): Ginkgo leaf ES (español): Ginkgo, hoja de ET (eesti keel): hõimikpuuleht FI (suomi): neidonhiuspuu, lehti FR (français): Ginkgo (feuille de) HR (hrvatski): ginkov list HU (magyar): Páfrányfenyőlevél IT (italiano): Ginkgo foglia	LT (lietuvių kalba): Ginkmedžių lapai LV (latviešu valoda): Ginka lapas MT (Malti): Werqa tal-Ginko NL (Nederlands): Ginkgo PL (polski): Liść młoczeńbu japońskiego PT (português): Ginkgo, folha RO (română): frunză de ginkgo SK (slovenčina): List ginka SL (slovenščina): list ginka SV (svenska): Ginkgo, blad IS (islenska): NO (norsk): Ginkgoblád
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Community herbal monograph on *Equisetum arvense* L., Herba (agerpadderokke)

4.1 Indication

Well-established use



Traditional use

Traditional herbal medicinal product to increase the amount of urine to achieve flushing of the urinary tract as an adjuvant in minor urinary complaints.

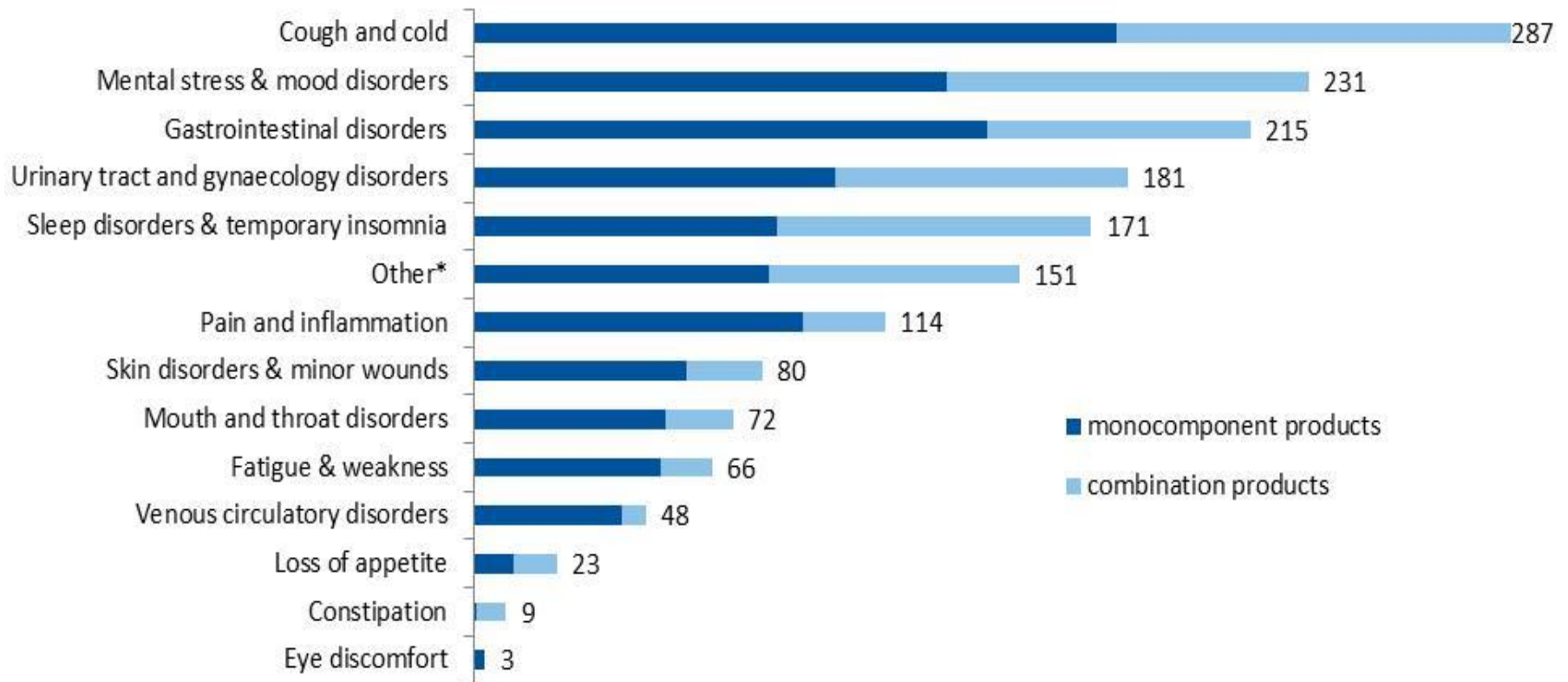
The product is a traditional herbal medicinal product for use in specified indication exclusively based upon long-standing use.

Structure of HMPC Herbal Monographs

2. Qualitative and quantitative composition
3. Pharmaceutical form
4. Clinical particulars
 - 4.1 Therapeutic indications
 - 4.2 Posology, method of administration
 - 4.3 Contraindications
 - 4.4 Special warnings and precautions for use
 - 4.5 Interactions
 - 4.6 Pregnancy and lactation, fertility
 - 4.7 Effects on ability to drive and use machines
 - 4.8 Undesirable effects
 - 4.9 Overdose
5. Pharmacological properties
6. Pharmaceutical particulars

Therapeutic Areas of Traditional Herbal Medicinal Products

(reference: www.ema.europa.eu)



Public friendly information on herbal medicinal substances – published 3 August 2015

- ARSP – Assessment Report Summaries for the Public
- Regular publications of ARSP on the EMA web
- Easy to understand information
 - information on the herbal substance
 - data supporting the recommendation
 - potential side effects
 - How products with the herb are approved in the EU
- ARSP for all new and future revised monographs

Eschscholzia (California poppy)

Ginkgo biloba

Symphytum (Comfrey root)

Capsicum

Agrimonia

Hieracium (mouse-ear hawkweed!)



Upcoming tasks and challenges for HMPC

- Continued revision of herbal monographs
- Assessment of herbal combination products
- Further guidance to interested parties outside EU
- Increase the knowledge **about** HMPC:
 - Explore possible patient involvement
 - Increase and establish contact points in Learned societies
- International cooperation:
 - Finalize International strategy document



COMMUNITY HERBAL
MONOGRAPH ON AESCULUS
HIPPOCASTANUM L., SEMEN



Current PCWP communication with HMPC

PCO's and HMPC

- PCO's or have no membership in HMPC
- HMPC member observer in PCWP
- PCWP meetings valuable fora for exchange of ideas and information
- Project on public assessment reports of herbal monographs (ARSP's)

PCO's in EMA in general

- PCO's have membership in 4 of 6 Committees on Human medicines
- Increased patient involvement in EMA since 2006
- Patient-centric focus in general in medicines industry
- Patient involvement in EMA in sub-groups, SAG's, WP's, document review, PIL's etc.

Closer contact between HMPC and patients – an added value?

- HMPC view:
 - View of the patient can add to discussions of indications and minor diseases
 - Ginkgo biloba (mild dementia), crataegus (heart diseases), isphagula (cholesterol)
 - Increased knowledge of patients on herbal framework and monographs
 - Increased legitimacy of HMPC documents
 - Increased communication to patient groups and users of herbals
- Patient view:
 - Many patients and consumers use herbals
 - Lack of validated information on herbal medicinal products
- PCWP view:
 - Herbal medicinal products are not a priority, but there is an interest in exploring possible areas for mutual benefit

HMPC and PCWP – possible areas for collaboration



ARSP – summaries for the public

Herbal monographs

Forms of collaboration

- Is the information in the ARSP useful?
- Difference between a PIL and an ARSP?
- Is a monograph useful for patients?
Wording of the indication?
Where to find information on herbals?
- To be explored:
PCO representative to participate in MLWP meeting on ad hoc basis
Procedure like PIL's?