
The use of invented names for non-prescription medicines

EMA Hearing on invented names
London, 11 September 2006

Introduction

- The EU's new pharmaceutical legislation offers innovative non-prescription medicines access to the centralised procedure
- Use of invented names is particularly important for the self-medication industry
- No specific restrictions in the revised EU legislation



Role of an invented name

- Consumers appreciate invented names (also called brands or trade names) as they give guidance and provide experience and credibility
- Invented names establish trust and quality reputation between the company/product and the user
- ... and are consequently chosen by a company with great care and after thorough investigation

Switched products

Current EMEA guideline states that:

- The invented name may be retained if the medicinal product is switched to non-prescription status
- A new invented name may be chosen for the switched medicinal product

The EMEA Guideline is in line with the G10 recommendations

The critical issue

- Use of the same invented name (trade name) for different medicinal products (with different names through suffixes/prefixes but with the same ‘core’ trade name) which are perceived as treating the same or similar problems (“umbrella trade names” or “umbrella brands”)

OTC umbrella brand examples



Canesten®



ASPIRIN®



OTC umbrella brand examples (Voltaren®)



Umbrella brands

- Umbrella brands are employed to allow consumers to easily navigate categories, recognise product-families and then select individual products
- Umbrella brands are structured around customer needs to provide guidance
- Umbrella brands create trust – in particular for new product forms or for the treatment of conditions so far not self-treated
- Consumers are already exposed to numerous examples of umbrella brands in all kinds of product categories

Keep in mind

- People do not typically recognise their ailments from a medical perspective but from how they feel and perceive their problems
- Confining brands only to certain ingredients or medically defined conditions does not correspond to people's expectations

Creating a new brand

- Building trust and awareness behind entirely new brands is difficult within consumer healthcare
- Requiring distinctly different brand identities for each different ingredient or medical condition could hold back the development of new self-medication products or categories of products

Common European Names

- European consumers are becoming increasingly mobile:
 - Individuals travelling regularly for work;
 - Families vacationing or relocating abroad;
 - Senior citizens retiring abroad.
- Unfamiliar pharmacy environments and language difficulties can prevent consumers from getting treatment for common conditions where self-medication is usually routine.
- Rapid recognition of familiar brands can greatly aid the consumer and facilitate quick and uncomplicated treatment in these circumstances.

The challenge

- The application of revision 4 of the EMEA guideline on invented names to non-prescription medicines would impose major restrictions on the use of umbrella trade names for these medicines, e.g. by prohibiting widely used prefixes / suffixes, or on their use with combination products
- Current “exemption clause” for non-prescription medicines allows case-by-case decisions
- ... but lack of clearer rules makes planning difficult

Conclusion

- People are used to dealing with umbrella brands
- Umbrella brands guide people
- Umbrella brands for non-prescription medicines do not cause a risk to public health