

- 20 March 2024
- 2 EMA/HMPC/418902/2005 Rev. 6
- 3 Committee on Herbal Medicinal Products (HMPC)
- Template for Assessment report for the development of
- European Union herbal monographs and European Union 5
- list entries 6

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Draft - Revision 6

Adoption by Committee on Herbal Medicinal Products (HMPC)	11 January 2007
Revision 1 adopted by HMPC	6 November 2008
Revision 2 adopted by HMPC	6 May 2010
Revision 3 ¹ adopted by HMPC	10 May 2011
Revision 4 adopted by HMPC	25 March 2014
Revision 5 agreed by HMPC Organisational Matters Drafting Group (ORGAM	May 2014
DG)	September 2014
Coordination with HMPC Working Party on European Union Monographs and	July2014
European Union List (MLWP)	
Revision 5 ² adopted by HMPC	29 September 2014
Draft Revision 6 adopted by HMPC for release for consultation	20 March 2024
Start of public consultation	15 April 2024
End of consultation (deadline for comments)	15 July 2024

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

Keywords	Committee on Herbal Medicinal Products; HMPC; European Union herbal
	monographs; European Union list of herbal substances, preparations and
	combinations thereof for use in traditional herbal medicinal products; herbal
	medicinal products; traditional herbal medicinal products; traditional use;
	well-established medicinal use; benefit-risk assessment; assessment report

¹ Changes introduced in section 6 Overall conclusions.

² Corrected reference to legislation: e.g. 'Directive 2001/83/EC as amended' replaced with 'Directive 2001/83/EC'.

- 13 <date>
- 14 <doc ref>
- 15 Committee on Herbal Medicinal Products (HMPC)

Assessment report on <plant, plant part>

- 17 Insert botanical name of the plant according to the binomial system
- 18 (genus, species, variety and author), [comma] the plant part in Latin.
- 19 <Draft><Final>
- 20 <Based on Article 10a of Directive 2001/83/EC (well-established use)>
- 21 <Based on Article 16d(1), Article 16f and Article 16h of Directive 2001/83/EC (traditional use)>

Herbal substance(s) (binomial scientific name of the plant, including plant part)	<pre><rapporteur include="" text="" to=""> Copy from monograph section 2i).</rapporteur></pre>	
Herbal preparation(s)	<pre><rapporteur include="" text="" to=""> Copy from monograph section 2ii).</rapporteur></pre>	
Rapporteur(s)	<pre><rapporteur include="" text="" to=""> Name of HMPC member (not Member State). If not the same rapporteur since last version, all rapporteurs should be listed and the version specified in brackets.</rapporteur></pre>	
Assessor(s)	<pre><rapporteur include="" text="" to=""> Name of assessor(s) should only be included if different from rapporteur. If not the same assessor(s) since last version, all assessors should be listed and the version specified in brackets. The assessor's area of expertise should also be specified e.g. quality, non- clinical or clinical assessor.</rapporteur></pre>	
Peer-reviewer	<pre><rapporteur include="" text="" to=""> If not the same peer-reviewer since last version, all peer- reviewers should be listed, and the version specified in brackets.</rapporteur></pre>	

22 <Note: This draft assessment report is published to support the public consultation of the draft

<European Union herbal monograph> <public statement> on <plant, plant part>. It is a working

document, not yet edited, and shall be further developed after the release for consultation of the

<monograph> <public statement>. Interested parties are welcome to submit comments to the HMPC

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- 26 secretariat, which will be taken into consideration but no 'overview of comments received during the
- 27 public consultation' will be prepared on comments that will be received on this assessment report. The
- 28 publication of this draft assessment report has been agreed to facilitate the understanding by
- 29 Interested Parties of the assessment that has been carried out so far and led to the preparation of the
- 30 draft <monograph> <public statement>.>

31 Note.

- All instruction notes (in green) must be deleted before finalising the AR.
 - None of the headings should be deleted during the preparation of the AR. If there is no information available for a heading, please insert 'No information available'. If a heading is not relevant, please insert 'Not applicable'. There are several examples of standard sentence to be used, if appropriate.
 - Text should be written in the provided text boxes <Rapporteur to include text> only. Do not change the prespecified font of the text field. Suggested font: Verdana 9.
 - Critical assessment (e.g. comments on the validity and interpretation of the data, conclusions) should be described in the "Assessor's comments" sub-sections that follow each chapter, in italic in a box. The principle of the template is to make clear distinctions between presentation of data (methodology and results) and the assessment of the data ("assessor's comment"). In case a sentence is concluding something which is not a comment from the assessor i.e. likely from an article but it seems it is concluded by the rapporteur; 'According to the author' to be added. Chapters with a heading including the word 'conclusion' should include a summary of all critical assessment of the assessor for that particular chapter. If an assessor's comment is not needed, the Rapporteur should delete the box inserted in the template. If an additional assessor's comment is needed, the Rapporteur should include as appropriate.
 - The report should be sufficiently detailed to allow for secondary assessment of the available data by other HMPC experts.
 - All tables to be numbered in sequential order. The tables in the template should all be filled by the rapporteur unless there is no data available. In these exceptional cases, the table should be deleted and replaced with 'No information available'.
 - All sections of the monograph should have a justification in the AR.
 - In addition to guidance documents established by HMPC

 (https://www.ema.europa.eu/en/human-regulatory/researchdevelopment/scientific-guidelines/multidisciplinary/herbalmedicinal-products-scientific-guidelines), the rapporteur,
 assessor(s) and peer-reviewer should also pay attention to other
 EMA/ICH/EC guidance documents of relevance for the development of
 monographs for example the 'Guideline on risk assessment of
 medicinal products on human reproduction and lactation: From data to
 labelling' (EMEA/CHMP/203927/2005) and 'A guideline on summary of
 product characteristics (SmPC)' September 2009 Revision 2.

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1. Introduction

1.1. Description of the herbal substance(s), herbal preparation(s) or

139 combinations thereof

• Herbal substance(s)

137

- 141 < Rapporteur to include text>
- 142 Insert only reference to the relevant European Pharmacopoeia monograph
- 143 or in absence thereof, to the monograph of a national pharmacopoeia or
- 144 national codex currently used officially in a Member State. In their
- 145 absence, state that no official quality standard available. Reference
- 146 to other bibliographic sources is possible.
- Herbal preparation(s)
- 148 < Rapporteur to include text>
- 149 Insert only reference to the relevant European Pharmacopoeia monograph
- or in absence thereof, to the monograph of a national pharmacopoeia or
- 151 national codex currently used officially in a Member State. In their
- 152 absence, state that no official quality standard available. Reference
- 153 to other bibliographic sources is possible. This sections is related to
- 154 available quality standards and there is no need to repeat information
- on all preparations included in the monograph.
- Relevant constituents for this assessment report
- 157 < Rapporteur to include text>
- 158 Include a very short overview on relevant constituents, no detailed
- 159 figures or structures.

160 1.2. Search and assessment methodology

- 161 The Rapporteur shall undertake a comprehensive search of relevant
- 162 scientific literature and articles, Acts of law and regulations and
- 163 other relevant sources. The rapporteur should carefully select the
- 164 references considered to be relevant. Cross-reference to the list of
- 165 references in Annex, which should list separately the references
- 166 supporting the assessment report.
- 167 Examples of scientific databases to be searched are Medline, PubMed,
- 168 Cochrane Database of Systematic Reviews, EMBASE etc. The Rapporteur
- shall describe the searches with database assessed, key words, date,
- and filters used, if applicable e.g. restrictions with regard to
- 171 language and date of publication. The Rapporteur shall describe the
- 172 advanced search methodology/strategy, key words, scheme, use of
- 173 additional tools (e.g. MeSH). Importantly, the Rapporteur should
- 174 present the plant names used in the searches including the scientific
- 175 plant name(s).

Additional relevant references could also be retrieved from the checked 176 177 references. Examples of books are Hagers Handbuch, The Complete German Commission E Monographs, PDR for herbal medicines etc. 178 The Rapporteur should also take into consideration information provided 179 by the Member States relating to safety/pharmacovigilance included in 180 181 the market overview provided by the Member States. The Rapporteur shall also search for data, including alerts, from EU 182 regulatory authorities. In addition, information from non-EU regulatory 183 authorities for examples Health Canada monographs or WHO monographs 184 could be searched, if relevant to herbal substances and preparations in 185 186 EU.The rapporteur in collaboration with pharmacovigilance colleagues, 187 188 should check data from the EudraVigilance database. If relevant, other 189 pharmacovigilance databases could be searched e.g. VigiBase. 190 The rapporteur should check the EURD-list if a PSUSA-procedure(s) has been finalised. If so, the rapporteur should liaise with Lead Member 191 State (LMS) for the outcome of the PSUSA. 192 The rapporteur should also check consistency with other monographs 193 194 within the therapeutic area. However, the rapporteur should be careful to avoid transferring the conclusions or indications, which were based 195 196 on specific data and assessment from one monograph to another. 197 Scientific databases 198 ☐ Scientific/Medical/Toxicological databases 199 < Rapporteur to include the name of database, the period covered, search date, search terms, 200 and if appplicable the filters used> ☐ Pharmacovigilance databases 201 202 ☐ data from EudraVigilance 203 from other sources (e.g. data from VigiBase) ☐ Other <Rapporteur to include text> 204 205 Books 206 <Rapporteur to include text> 207 Regulatory practice 208 Old market overview in AR (i.e. check products fulfilling 30/15 years of TU or 10 years of 209 WEU on the market) 210 ☐ Market overview (including pharmacovigilance actions taken in member states) 211 212 Feedback from experiences with the monograph during MRP/DCP procedures 213 ☐ Ph. Eur. monograph 214 ☐ Other <Rapporteur to include text i.e referral, data submitted by the IP> Consistency (e.g. scientific decisions taken by HMPC) 215 ☐ Public statements or other decisions taken by HMPC 216 ☐ Consistency with other monographs within the therapeutic area 217

☐ Other <Rapporteur to include text>

219 Other

221 1.3. <Main changes introduced in the <Number as appropriate>

- 222 revision>
- 223 < Rapporteur to include text, if applicable >
- 224 During a revision the rapporteur should carefully select the references
- 225 considered to be relevant to keep the assessment report concise. The
- 226 rapporteur may also delete or shorten the text included in the
- 227 first/previous version, as considered appropriate.
- 228 When the assessment report is revised, the rapporteur should briefly
- 229 summarise the main changes under this section. In particular, changes
- 230 that support relevant changes in the monograph should be summarised in
- 231 this section. This section should be short and refer to the chapters
- 232 that have been changed.

2. Data on medicinal use

2.1. Information about products on the market

235 2.1.1. Information about products on the market in the EU/EEA Member

236 States

233

234

- 237 According to the information provided by the National Competent
- 238 Authorities. Data are collected using the template entitled 'Document
- 239 for information exchange for the preparation of the assessment report
- 240 for the development of European Union monographs and for inclusion of
- 241 herbal substance(s), preparation(s) or combinations thereof in the
- 242 list' (EMEA/HMPC/137093/2006).
- 243 The information on the regulatory status of the products may preferably
- 244 include the nature of the authorisation granted for the product to
- 245 access the market (MA based on full or mixed application, MA based on
- 246 bibliographic application as per Article 10a of Directive 2001/83/EC,
- 247 traditional use registration, etc.) to establish the period of
- 248 medicinal use:
- 249 for TU: at least 30 years of medicinal use including at least 15
- 250 years in the EU
- 251 for WEU: at least 10 years of approved medicinal product in the EU.

252 Information on medicinal products marketed in the EU/EEA

253 Table <insert number>. Overview of data obtained from marketed medicinal products.

Herbal substance/ preparation	Indication	Posology and method of administration Posology, age groups, pharmaceutical form, method of administration, duration of use	Regulatory Status Type of Marketing authorisation/re gistration where possible, date, Member State
As reported in the market overview	As reported in the market overview	As reported in the market overview.	Brand names can be kept during discussion but shall be deleted at publication stage

This overview is not exhaustive. It is provided for information only and reflects the situation at the time when it was established.

Information on relevant combination medicinal products marketed in the EU/EEA

257 < Rapporteur to include text or insert 'Not applicable'>

256

258

259

260

Include any other information on combination medicinal products considered relevant for the establishment of the monograph. For combination monographs the table above should be deleted.

Table < insert number>. Information on relevant combination medicinal products marketed in the EU/EEA.

Herbal substances/ preparations	Medicinal use	Posology and method of administration Posology, age groups, pharmaceutical form, method of administration, duration of use	Regulatory Status Type of Marketing authorisation/re gistration where possible, date, Member State
As reported in the market overview	As reported in the market overview	As reported in the market overview.	Brand names can be kept during discussion but shall be deleted at publication stage

- 263 This overview is not exhaustive. It is provided for information only and reflects the situation at the
- time when it was established.

265 Information on other products marketed in the EU/EEA (where relevant)

- 266 < Rapporteur to include text or insert 'Not applicable'>
- 267 Include any other relevant information on products available on the
- 268 market which are neither authorised nor registered (e.g. medical
- 269 devices, food supplements, cosmetics).
- 270 The information can be provided using the same format (table) as for
- 271 the information on medicinal products. Only products that have
- 272 sufficient information on preparation, medicinal use and posology
- 273 should be included in the table below.
- 274 Table <insert number>. Information on other products marketed in the EU/EEA.

Herbal substance/ preparation	Medicinal use	Posology and method of administration	Regulatory Status Food supplement/ Medical device/Cosmetic, date, Member State, date, if available
As reported in the market overview	As reported in the market overview	As reported in the market overview.	Brand names can be kept during discussion but shall be deleted at publication stage

This overview is not exhaustive. It is provided for information only and reflects the situation at the time when it was established.

2.1.2. Information on products on the market outside the EU/EEA

278 < Rapporteur to include text or insert 'Not applicable'>

- 279 Include information on products marketed outside the EU/EEA if
 280 available (data from literature to be reported only in section 2.2).
- 281 The information can be provided using the same format (table) as for
- the information on medicinal products marketed in the EU. Only products
- 283 that have sufficient information on preparation, medicinal use and
- 284 posology should be included in the table below. Brand names can be kept
- 285 during discussion but shall be deleted at publication stage.
- 286 Table <insert number>. Overview of information on products on the market outside the EU/EEA.

Herbal substance/ preparation	Indication/Medicinal use	Posology and method of	Regulatory Status
preparation		administration	Type of regulatory
		Posology, age groups, pharmaceutical form, method of administration, duration of use	status where possible, date, Country

This overview is not exhaustive. It is provided for information only and reflects the situation at the time when it was established.

2.2. Information on documented medicinal use and historical data from literature

291 < Rapporteur to include text>

289

- For each herbal substance/preparation, provide evidence of history and extent of use, obtained from literature, and preferably classified whether predominantly European or non-European tradition, and the current use. Only relevant data that will be used for conclusion on traditional use should be included.
- For each herbal preparation, provide information on traditional/current indication(s), specified strength and posology, route of administration, duration of use per indication. Evaluation on the use should be presented both on the known use(s) in the EU, and, if applicable, use(s) outside the EU. Only substances/preparations that have sufficient information on preparation, medicinal use and posology should be included in the table below.
- 304 Table < insert number >. Overview of historical data.

Herbal substance/ preparation	Documented use / Traditional use	Posology and method of administration	Reference and date of the reference
		Posology, age groups, pharmaceutical form (if available), method of administration, duration of use	

Herbal substance/ preparation	Documented use / Traditional use	Posology and method of administration	Reference and date of the reference
		Posology, age groups, pharmaceutical form (if available), method of administration, duration of use	

2.3. Overall conclusions on medicinal use

306 For each herbal substance(s)/preparation(s) with complete information, 307 provide an overview of the available sources (market data and/or 308 literature) that provide evidence of:

309 - period of use

305

310 - for TU: at least 30 years of medicinal use including at least 311 15 years in the EU

312 - for WEU: at least 10 years of approved medicinal product in the 313 EU.

314 - specified strength and specified posology

315 - indications suitable to the legal requirements in the relevant route 316 of administration.

In the table on 'Overview of evidence on period of medicinal use', the

318 same information as specified in the tables in section 2.1 and 2.2

319 should be included, without modifications.

320 Table < insert number >. Overview of evidence on period of medicinal use.

Herbal substance/ preparation	Indication	Posology and method of administration Posology, age groups, duration of use, method of administration	Period of medicinal use The date of the reference should be used.

- 322 <Clinical efficacy and safety based on Article 10a of Directive 2001/83/EC (well-established use), is
- evaluated in chapter 4 'Clinical data' and chapter 5 'Clinical Safety/Pharmacovigilance'. The non-clinical
- 324 safety is evaluated in chapter 3 'Non-clinical data'.>
- 325 <Clinical safety for preparations that fulfil the criteria of medicinal use throughout a period of at least
- 326 30 years, including at least 15 years within the EU/EEA, i.e. traditional medicinal use based on Article
- 327 16d(1), Article 16f and Article 16h of Directive 2001/83/EC is further evaluated in chapter 5 'Clinical
- 328 Safety/Pharmacovigilance'. The non-clinical safety is evaluated in chapter 3 'Non-clinical data'.>
- 329 < Rapporteur to include text>
- 330 The Rapporteur should discuss all available sources showing that the
- 331 requirements for the period of medicinal use are fulfilled and the
- 332 indication and posology that will be considered for inclusion in the
- 333 monograph to be further evaluated in chapter 3-5. For example, the
- 334 choice for the wording of traditional use indications vis-à-vis
- 335 existing wordings in monographs in the same therapeutic area should be
- 336 briefly discussed/justified. Information on duration of use should also
- 337 be discussed.

3. Non-Clinical Data

- 339 For all studies cited, it should be stated by means of a detailed
- 340 description which herbal substance(s)/herbal preparation(s) have been
- 341 used and information should be provided for each preparation separately
- 342 (if such information are not known from the reference, this should be
- 343 stated as well). The studies should be organised in studies performed
- 344 with preparations covered by the monograph (or similar preparations),
- 345 other preparations (different to those covered by the monograph) and
- 346 single (isolated) substances), if the single (isolated) substance is
- 347 relevant for therapeutic indication or safety of the herbal
- 348 substance(s)/preparation(s) in the monograph.
- 349 The rapporteur should separate in vitro data from in vivo data,
- 350 preferably as a new heading in italic (but not with a numbering).
- 351 For all studies cited, it should be stated clearly, which
- 352 concentrations/dosage have been used and in which concentrations/
- 353 dosages effects were seen; it should be stated if e.g. a IC_{50} or EC_{50}
- 354 was calculated.
- 355 The Rapporteur should discuss the relevance of the findings in relation
- 356 to the herbal preparations accepted in the monograph. A comparison to a
- 357 human equivalent exposure should be given, if considered relevant,
- 358 using allometric factors according to the "Guideline on strategies to
- 359 identify and mitigate risks for first-in-human and early clinical
- 360 trials with investigational medicinal products" (EMEA/CHMP/SWP/28367/07
- 361 Rev. 1).
- 362 The rapporteur should discuss whether findings have implications for
- 363 human safety and whether additional data in human is needed to assess
- 364 this (e.g. there are findings regarding carcinogenicity, but receptors
- 365 are different between target species and man).

- 366 Critical assessment (e.g. comments on the validity and interpretation
- 367 of the data, conclusions) should be described in the "Assessor's
- 368 comments" sub-sections that follow each chapter and should include
- 369 findings that need to be reflected in the monograph.
- 370 See also 'Non-clinical documentation in applications for marketing
- 371 authorisation/registration of well-established and traditional herbal
- 372 medicinal products' (EMEA/HMPC/32116/2005) and other relevant EMA non-
- 373 clinical scientific guidelines for more details.

374 3.1. Overview of available pharmacological data regarding the herbal

375 **substance(s), herbal preparation(s) and relevant constituents thereof**

3.1.1. Primary pharmacodynamics

377 < Rapporteur to include text>

- 378 The Rapporteur shall describe pharmacological data that support the
- 379 indication(s) in the monograph. The rapporteur should carefully select
- 380 the main studies to be included in the table below i.e. studies with
- 381 relevant model/animal species and dosage for humans.
- 382 Preferably, references cited should be summarised in text in the style
- 383 of an abstract and details presented in a table (see table template
- 384 below for further information). For each therapeutic area, studies of
- 385 relevance for potential WEU and/or TU indication(s) should be included
- in a separate table. Only studies with all information available to
- 387 complete all columns in the table should be included in the table.
- 388 Importantly, the reference should be presented sufficiently detailed to
- 389 allow for secondary assessment of the available data by other HMPC
- 390 experts. In-vitro studies should only be given in the table in
- 391 exceptional cases since missing PK data will not allow to discuss the
- 392 relevance for clinical use.
- 393 The rapporteur should consider for each study: objective, design,
- 394 duration, dose, endpoints, positive and negative controls, statistical
- 395 method. If such information is not given in the reference, this should
- 396 be stated as well. The Rapporteur should assess:
- 397 Is the design of the studies adequate?
- 398 Is the posology/concentration (in-vitro/ex-vivo) at least in a
 399 biological imaginable order of magnitude (e.g. in vitro IC50<100
- 400 $\mu g/ml$ for extracts)
- 401 Is the choice of endpoints/controls and methods of assessment as 402 well as the duration of the study in accordance with scientific
- 403 guidelines.
- 404 Magnitude and relevance of the effect.
- 405 All the studies included in this chapter should be assessed, and a
- 406 clear statement should be given on the relevance of the model and
- 407 dosage for humans.

408 Table < insert number >. Overview of the main non-clinical data.

Herbal preparation tested	Concentration/ Dosage Route of administrati on for in vivo studies	Animal species/ Experimental model In vivo/ In vitro	Reference Author(s) and year of publication	Main outcome(s) according to the authors Main outcome/ result of the study according to the authors
comparable/similar preparations to preparations of the monograph				
other preparations				
single substances				

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Assessor's comment:

- 411 < Rapporteur to include text>
- For WEU monographs, discuss the possible mechanism of action and/or a statement that the mechanism of action is not known.

414 **3.1.2.** Secondary pharmacodynamics

- 415 < Rapporteur to include text>
- 416 The Rapporteur shall briefly describe the results from studies which
- 417 are not connected to the indication(s) agreed in the monograph. The
- 418 main focus should be from a safety perspective and in vitro results is
- 419 considered not relevant for the establishment of a monograph. If a
- 420 recent review of good quality is available, this reference could be
- 421 preferable to keep this section short and concise.

422 **Assessor's comment:**

423 < Rapporteur to include text>

3.1.3. Safety pharmacology

- 425 < Rapporteur to include text>
- 426 The following points should be addressed if data is available:
- Cardiovascular system (including QT prolongation in-vitro/in-428 vivo)
 - Central nervous system
- Respiratory system
- Other e.g. Renal and GI system
- 432 **Assessor's comment:**
- 433 < Rapporteur to include text>

3.1.4. Pharmacodynamic interactions

- 435 < Rapporteur to include text>
- 436 Potential pharmacodynamic drug interactions may include:
- Interactions at receptor level
 - Possible co-medications in the clinical setting
- Alerts from safety pharmacology or toxicology studies
- 440 **Assessor's comment:**
- 441 < Rapporteur to include text>

442 **3.1.5. Conclusions**

- 443 < Rapporteur to include text>
- 444 <Results from relevant non-clinical pharmacology studies on <insert> are limited and not
- 445 required.>

434

438

- 446 The conclusions shall include statements on the presence and usefulness
- 447 of the data. The Rapporteur should discuss the relevance of the
- 448 findings in relation to the herbal substances/preparations accepted in
- 449 the monograph, especially as regards to the posology used in the animal
- 450 testing in comparison to the therapeutic posology in humans.
- 451 If considered relevant, safety pharmacology findings predicting
- 452 potential adverse events in humans should be discussed.

453 **3.2. Overview of available pharmacokinetic data regarding the herbal** 454 **substance(s), herbal preparation(s) and relevant constituents thereof**

- 455 < Rapporteur to include text>
- 456 If possible, the Rapporteur to differentiate between Absorption,
- 457 Distribution, Metabolism, Elimination and Pharmacokinetic interactions
- 458 with other medicinal products. The rapporteur should separate in vitro
- 459 data from in vivo data, preferably as a new heading in italic (but not
- 460 with a numbering). For all studies cited, it should be stated by means
- 461 of a detailed description which herbal substance(s)/herbal
- 462 preparation(s) have been used and information should be provided for
- 463 each preparation separately (if such information are not known from the
- 464 reference, this should be stated as well). The studies should be
- 465 organised in studies performed with preparations covered by the
- 466 monograph (or similar preparations), other preparations (different to
- 467 those covered by the monograph) and single (isolated) substances).

468 **Assessor's comment:**

- <Rapporteur to include text>
- 470 <Specific data on pharmacokinetics and interactions are not available.>
- 471 The Rapporteur shall include statements on the presence and
- 472 usefulness of the data. Comment on the relevance of the animal
- 473 species used for human safety assessment e.g. considering metabolic

- 474 patterns. Other important aspects may include major differences in
- 475 absorption/bioavailability, interindividual/interspecies variability,
- 476 elimination rates (differences in $t\frac{1}{2}$), etc.
- 477 Comment on other issues that may be of importance for the safety
- 478 assessment e.g. distribution to target organs, excretion routes, and
- 479 pharmacologically active metabolites. Discuss interspecies
- differences and compare with the clinical situation.

481 3.3. Overview of available toxicological data regarding the herbal

482 substance(s)/herbal preparation(s) and constituents thereof

483 3.3.1. Single dose toxicity

- 484 < Rapporteur to include text>
- 485 The single-dose data should be very briefly summarised, in order by
- 486 species, by route.

487

498

Assessor's comment:

- 488 < Rapporteur to include text>
- 489 To be considered:
- 490 The duration of observation (14 days in a standard GLP study) and a
- 491 short statement on whether studies revealed low or high acute toxicity
- 492 should be included.
- 493 It is considered useful to include the approximate lethal dose or
- 494 observed maximum non-lethal dose.
- 495 The clinical signs of acute toxicity (briefly) and the mode and time
- 496 of death (early/same day or delayed).
- 497 Specify target organs, (histo)pathology if available.

3.3.2. Repeat dose toxicity

- 499 < Rapporteur to include text>
- 500 The studies should be organised by herbal substance/preparation,
- 501 species and route of administration. A short description of the design
- 502 (strain, route of administration, dose groups, number
- 503 animals/gender/group, recovery groups if any, toxicokinetics if
- performed).
- 505 The main findings should be comprehensively described, namely: death,
- 506 body weight, relevant laboratory findings, target organs with type of
- 507 histopathological lesions, dose-dependency, onset, severity, species or
- 508 gender related differences and duration of toxic effect.
- 509 The No Observed Adverse Effect Level (NOAEL) in the different species
- 510 should be provided (if established) with comments on the relation of

- 511 the systemic exposure at that dose level to the systemic exposure in
- 512 humans given the maximum intended dose (exposure margin).
- 513 A statement whether reversibility has been demonstrated in the recovery
- 514 group should be included.
- Table < insert number >. Overview of repeat dose toxicity studies.

Study (reference)	Herbal substance/ preparation/ isolated compounds	Species/Sex/ Number/ Group	Dose/Route/ Duration	NOEL/NOAEL (mg/kg/day) according to the authors	Major findings according to the authors

517

518

519

520

521

522

Assessor's comment:

<Rapporteur to include text>

Highlight the important findings; discuss the mechanistic background

and the margin to the clinical exposure. Discuss if the studies

fulfil the current guideline requirements.

3.3.3. Genotoxicity

- 523 < Rapporteur to include text>
- 524 Sort the performed tests according to the 'level' of genotoxicity, i.e.
- 525 mutagenicity (gene mutations), chromosomal aberrations (clastogenicity)
- 526 in-vitro, chromosomal aberrations (clastogenicity) in- vivo, primary
- 527 DNA damage and other genotoxic effects. Preferably, present results in
- 528 a table (see example below). See also 'Assessment of genotoxicity of
- 529 herbal substances/preparations' (EMEA/HMPC/107079/2007).
- Table < insert number >. Overview of genotoxicity studies.

Type of test/reference	Test system	Herbal substance/ preparation/ isolated compound	Concentrations/ Concentration range/ Metabolising system	Results positive/negative/ equivocal
Gene mutations in bacteria	Salmonella strains		+/- 59	
Gene mutations in mammalian cells	CHO-cells, HGPRT-locus		+/- 59	

Chromosomal	Mouse,	+/- S9	
aberrations	micronuclei		
in vivo	in bone		
	marrow		

532

533

Assessor's comment:

<Rapporteur to include text>

- 534 Issues to consider when evaluating genotoxicity tests:
- 535 For in-vitro tests:
- 536 ■Which strains /cells are used and which endpoints.
- 537 Selection of concentrations.
- 538 Stability in the medium (check of concentration/degradation
- 539 products).
- 540 Metabolising system.
- 541 Positive and negative controls.
- 542 Treatment time/sampling time.
- 543 Criteria for positive response as/if given by the authors.
- •Concentration-response relationship.
- •Reproducibility.
- 546 Cytotoxicity / cell survival.
- 547 For in-vivo tests:
- **548** ■Which species/strain/model was used?
- 549 Number and gender of animals.
- **■**Doses and exposure established by toxicity or kinetics.
- •Metabolic differences between species and human.
- •Treatment and sampling times.
- •Criteria in the study for positive response.
- **■** Dose/time-response relationship.
- 555 Issues to discuss:
- 556 Positive findings in either in-vitro or in-vivo tests.
- Mechanistic background: mutagenic or clastogenic.
- Is a threshold approach possible?
- 559 If yes, what is the margin of safety with human plasma
- 160 level/exposure?

563

- 561 Discuss if the studies fulfil the current guideline requirements.
- Justification(s) for monograph section 5.3.

3.3.4. Carcinogenicity

564 <Rapporteur to include text>

- Give a short summary of results including neoplastic changes as well as relevant non-neoplastic changes, as appropriate. Non-neoplastic changes
- should be discussed with reference to the observations in repeat-dose
- 568 toxicity studies. Preferably, list results in a Table (example below).

Table < insert number >. Overview of carcinogenicity studies.

Study (reference)	Herbal substance/ preparation/ isolated compound	Dose/Route	Species/No. of animals	Major findings

570

571

572

573

588

593

Assessor's comment:

<Rapporteur to include text>

Issues to be considered in detail:

- 574 Species strain and gender.
- 575 •Number of groups (control groups).
- 576 Number of animals per group.
- 577 Route of administration
- 578 Duration of treatment.
- **579** Growth (BW gain and FC)
- 580 Survival at the end of the study.
- 581 Tumour findings organs, type (B or Malignant), incidence.
- 582 ■Pre-neoplastic findings.
- 583 Nomenclature of tumours.
- 584 Statistical methods used.
- 585 Toxic findings not seen in the studies of shorter duration.
- 586 Discuss if the studies fulfil the current guideline requirements.
- 587 Provide suggestions and justifications for monograph section 5.3.

3.3.5. Reproductive and developmental toxicity

589 < Rapporteur to include text>

590 Give a summary presentation of the performed studies, preferably in a 591 table (example below) including dose-finding studies, as appropriate.

592 Consider information relevant to reproduction toxicity also from other

studies. For instance, histopathology of reproductive organs from

594 repeat-dose toxicity, endocrine effects etc.

595 Table <insert number>. Overview of reproductive and developmental toxicity studies.

Study	Species; Number Female/group	Herbal preparation/ Route & dose	Dosing period	NOAEL according to the authors	Major findings according to the authors
Male fertility					
Female fertility					
Embryo-fœtal development				F0 F1	
Peri & postnatal					

597 **Assessor's comment:**

- 598 | <Rapporteur to include text>
- 599 Conclusions on the reproductive toxicity:
- 600 Comment on the relevance of the tested systems used (e.g.
- 601 species/strain) (e.g. based on comparative metabolism and kinetics,
- 602 comparative pharmacodynamics).
- Evaluate exposure and distribution data in pregnant and/or lactating animals, and in offspring (including milk excretion).
- •Include critical assessment on each specific area of the studies and provide concluding remarks considering relevant findings.
- •Consider margins of exposure and assess the clinical relevance of the findings.
- 609 Discuss if the studies fulfil the current guideline requirements.
- 610 Justification(s) for monograph section 4.6 and 5.3.

611 **3.3.6. Local tolerance**

- 612 < Rapporteur to include text>
- 613 A short comment on whether the compound showed any evidence of local
- 614 irritancy at the site of administration. Sensitisation studies should
- 615 be included if applicable (dermal route).

616 **Assessor's comment:**

617 < Rapporteur to include text>

618 3.3.7. Other toxicity studies

- 619 < Rapporteur to include text>
- 620 Any such studies should be noted, and findings commented upon.
- 621 **Assessor's comment:**
- 622 | <Rapporteur to include text>

3.3.8. Conclusions on toxicological data

- 624 < Rapporteur to include text>
- 625 <Non-clinical information on the safety of <insert> is <missing><scarce><limited>. <With the
- 626 limited data available it is difficult to draw any firm conclusions especially regarding <genotoxicity> <
- 627 carcinogenicity> < and reproductive and developmental toxicity.>
- 628 <As there is no information on reproductive and developmental toxicity, the use during pregnancy and</p>
- 629 lactation cannot be recommended.>
- The following text is included in the monograph section 4.6:
- 631 See decision tree in the 'Guideline on risk assessment of medicinal
- 632 products on human reproduction and lactation: From data to labelling'
- 633 (EMEA/CHMP/203927/2005).

- 634 <Overall, the toxicology programme revealed <insert>. This information has been included in the
- 635 monograph section <insert>.>
- The following text is included in the monograph section 5.3: <<Tests ><Adequate tests> on
- 637 reproductive toxicity, genotoxicity and carcinogenicity <have not been performed>.>
- 638 In terms of structure the conclusion should follow the presentation of
- 639 the results above. The rapporteur should conclude on available
- 640 toxicological data and the potential relevance for the human use.
- 641 Special emphasis should be put on genotoxicity, carcinogenicity and
- 642 reproductive and developmental toxicity findings. In case of positive
- 643 genotoxic effects, tumour findings and/or developmental/reproductive
- 644 toxicity findings, the possible relevance for the human situation
- 645 should be discussed and concluded upon.
- 646 If present in the herbal substance(s)/preparation(s), constituents with
- 647 safety concerns (e.g. estragole, thujone etc) should also be discussed.
- 648 Justifications for monograph section 4.6 and 5.3 should be included.

3.4. Overall conclusions on non-clinical data

- 650 < Rapporteur to include text>
- 651 In this part, the most important conclusions from section 3.1.5. and
- 652 3.3.8 should be summarised.
- 653 Ensure correspondence with monograph (particularly 5.3 Non-clinical
- 654 safety data and 4.6 Pregnancy and lactation, if relevant) and that all
- 655 information on non-clinical data in the monograph is explicitly
- 656 assessed and supported by the scientific assessment.
- 657 The Rapporteur may consider the possible inclusion of examples provided
- 658 below.

- 659 The following "standard" wording could be considered:
- 660 <Results from relevant non-clinical pharmacology studies on <insert> are limited and not
- 661 required.>
- 662 <Specific data on pharmacokinetics and interactions are not available.>
- 663 <Non-clinical information on the safety of <insert> is <missing><scarce><limited>. <With the
- limited data available it is difficult to draw any firm conclusions especially regarding <genotoxicity><
- 665 carcinogenicity> <and reproductive and developmental toxicity.> <<Tests><Adequate tests> on
- 666 reproductive toxicity, genotoxicity and carcinogenicity <have not been performed>.>
- <As there is no information on reproductive and developmental toxicity, the use during pregnancy and</p>
- 668 lactation cannot be recommended.>
- 669 <Overall, the toxicology programme revealed <insert>. This information has been included in the
- 670 monograph section <insert>.>

4. Clinical Data

For all studies cited, it should be stated by means of a detailed description which herbal substance(s)/herbal preparation(s) have been used and information should be provided for each preparation separately (if such information is not known from the reference, this should be stated as well or consider if the reference is not relevant to include).

This chapter should focus on studies of relevance for potential WEU indication(s) available in section 2.3 i.e. at least 10 years of medicinal use in the EU is a prerequisite for the establishment of a WEU monograph. However, if the rapporteur chooses to include studies on a preparation with less than 10 years of medicinal use, the rapporteur should justify why the studies are not relevant for a WEU monograph, e.g. that there is no information available that the preparation(s) have been in medicinal use for more than 10 years in EU in these indications (see chapter 2.1.1. 'Information about products on the market in the EU/EEA Member States') and that these studies will not be considered for a well-establish use monograph.

<There are numerous clinical studies performed with <insert>. In accordance with the guideline 'Assessment of clinical safety and efficacy in the preparation of EU herbal monographs for well-established and traditional herbal medicinal products' (EMA/HMPC/104613/2005 – Rev. 1), the assessment of well-establish use should also include if the products reported in the market overview can be considered as similar to the product studied in relevant clinical studies found in the literature (see chapter 2.1.1. 'Information about products on the market in the EU/EEA Member States'). Therefore, the scope of the assessment in this section is <insert>. Only studies related to these indications are included below. Beside these investigations, <insert> have been tested for clinical efficacy for instance in <insert>. There is no information available that <insert> have been in medicinal use for more than 10 years in EU in these indications (see chapter 2.1.1. 'Information about products on the market in the EU/EEA Member States'). Thus, these studies will not be considered for a well-establish use monograph.>

See 'Assessment of clinical safety and efficacy in the preparation of EU herbal monographs for well-established and traditional herbal medicinal products' (EMA/HMPC/104613/2005) for more details. In addition, EMA scientific guidelines on how to interpret and apply the requirements for the demonstration of efficacy set out in the EU directives should be taken into consideration. EMA scientific guidelines are available on for example insomnia, irritable bowel syndrome, pain, to give assessors guidance on relevant endpoints, validated/relevant scales, recommended study duration, choice of comparator, inclusion/exclusion criteria etc.; but also general Guidelines such as ICH E5 (R1), ICH E8 (R1) or ICH E9 should be noted.

712 **4.1. Clinical pharmacology**

4.1.1. Overview of pharmacodynamic data regarding the herbal

substance(s)/preparation(s) including data on relevant constituents

- 715 < Rapporteur to include text>
- 716 For example, clinical data related to information on mechanism of
- 717 action, onset and/or offset of action; support for the proposed dose
- 718 and dosing interval; clinically relevant pharmacodynamic interactions
- 719 with other medicinal products or substances; and possible genetic
- 720 differences in response.

721 **Assessor's comment:**

- 722 < Rapporteur to include text>
- 723 For WEU monographs, relevant information in accordance with the SmPC
- 724 guideline to be included in the monograph section 5.1 should be
- 725 discussed.

726 4.1.2. Overview of pharmacokinetic data regarding the herbal

727 substance(s)/preparation(s) including data on relevant constituents

- 728 < Rapporteur to include text>
- 729 If possible, differentiate between Absorption, Distribution,
- 730 Metabolism, Elimination. Also, data on preparation and isolated
- 731 compounds should be specified.

732 **Assessor's comment:**

- 733 < Rapporteur to include text>
- 734 For WEU monographs, relevant information in accordance with the SmPC
- 735 quideline to be included in the monograph section 5.2 should be
- 736 discussed.

737

4.2. Clinical efficacy

- 738 In the following sections on clinical efficacy the rapporteur should
- 739 consider for each study: objective, design, duration, study
- 740 participants (inclusion/exclusion criteria), sample size, dose,
- 741 efficacy variables (primary and secondary endpoints), effect size,
- 742 statistical method(s), numbers analysed, drop-outs. If such information
- 743 is not given in the reference, this should be stated as well. The
- 744 Rapporteur should assess:
- 745 Is the design of the studies adequate (randomised, active and/or
- 746 placebo controlled trials) and in line with scientific guidelines?
- 747 Is the patient population appropriate?
- 748 Is the choice of endpoints and methods of assessment as well as 749 the duration of the study in accordance with guidelines for the

- 750 relevant indication (if available). Where validated scales used?
 751 Duration of the study should be clinically justified.
- 752 Magnitude and clinical relevance of the effect. Was there a pre-753 definition of clinically relevant difference?
- 754 Do the results support the indication?
- 755 All the studies should be assessed, and a clear statement should be
- 756 given in an assessor's comment, if the results are sufficient to
- 757 support the usage in the indication of the monograph or not.

4.2.1. Dose response studies

759 < Rapporteur to include text>

758

765

- 760 For all studies cited, it should be stated clearly, which
- 761 concentrations/dosage have been used and in which concentrations/
- 762 dosages effects were seen.
- 763 **Assessor's comment:**
- 764 < Rapporteur to include text>

4.2.2. Clinical studies (case studies and clinical trials)

- 766 < Rapporteur to include text>
- 767 Preferably, references cited should be summarised in text in the style
- 768 of an abstract and only specific details briefly presented in a table
- 769 (see table template below for further information). For each
- 770 therapeutic area, studies of relevance for potential WEU indication(s)
- 771 should be included in a separate table. Only studies with all
- 772 information available to complete all columns in the table should be
- 773 included in the table. Importantly, the reference should be presented
- 774 sufficiently detailed to allow for secondary assessment of the
- 775 available data by other HMPC experts. Information on undesirable
- 776 effects is to be addressed under section 5 'Clinical Safety'.

777 **Assessor's comment:**

- 778 < Rapporteur to include text>
- 779 Comment on validity of the study as well as the clinical relevance of
- 780 the results. All studies cited should be followed by an assessor's
- 781 comment.

Table < insert number >. Clinical studies on < herbal substance/preparation > in < insert therapeutic area >.

784 The purpose of the table is to give a quick overview and focus of the relevant studies. The table should not include full sentences or value judgments such as "small", "superior" or "significant", only numbers.

Study and	Study design	Treatment	Number of	Type of subjects	Endpoints	Outcomes
study objective	Study	Herbal	subjects	Age, sex,	Primary and	Numerical
Reference;	design; Type	preparation,	Sample	ethnicity/genetic	secondary	results/scores
Aim and	of Control;	pharmaceutical	size	polymorphism,	endpoints.	including 95%
objective(s)	Study	form; Control	separated	healthy	Specify which	CIs (if
of study	duration,	treatment;	by	or	measure/scale	available).
	Single	Dosage	treatment	Diagnosis of	was used and	
	centre/multi	Regimen;	arm(i.e.	<i>Patients</i>	which	
	centre,	Route of	numbers	(inclusion/exclusion	comparison was	
	Country(ies)	Administration;	analysed)	criteria)	done (for	
		Duration of			example	
		treatment			difference in	
					change from	
					baseline or	
					ratio of	
					responders).	

4.3. Clinical studies in special populations (e.g. elderly and children)

788 < Rapporteur to include text>

787

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801

802

- 789 In this section clinical studies in special populations (e.g. elderly
- 790 and children) not included in section 4.2 should be presented.
- 791 Preferably, references cited should be summarised in text in the style
- 792 of an abstract and only specific details briefly presented in a table,
- 793 if applicable i.e. only studies with all information available to
- 794 complete all columns in the table should be included in a table.
- 795 Importantly, the reference should be presented sufficiently detailed to
- 796 allow for secondary assessment of the available data by other HMPC
- 797 experts. Information on undesirable effects is to be addressed under
- 798 section 5 'Clinical Safety'.

Assessor's comment:

800 < Rapporteur to include text>

4.4. Overall conclusions on clinical pharmacology and efficacy

<Rapporteur to include text>

- 803 A statement about the conclusions in terms of establishing efficacy
- 804 that can be drawn from the clinical efficacy documentation should be
- 805 provided here, as well as the rationale for including or excluding an
- 806 indication(s), population(s) and posology/posologies.
- 807 The key findings, the strength of the evidence and uncertainties should
- 808 be summarised and concluded upon. Discuss and conclude on the
- 809 importance of the favourable effects observed in relation to the target
- 810 disease and the target population. Discuss what magnitude of the effect
- 811 can be conserved as meaningful and how do the observed effects compare
- 812 to this. A clinically relevant effect is not the same as statistically
- 813 significant effect and is different for different therapeutic areas.
- 814 Discuss the impact of uncertainties and limitation of the data. The
- 815 main clinical studies should be described with respect to
- 816 randomisation, blinding, control and study size (i.e. the quality of
- 817 the studies) and the robustness/limitations of the results e.g. too
- 818 small sample size, representativeness of patient population, single
- 819 pivotal study, or inconsistency of findings between studies. The
- 820 strength of evidence for efficacy:
- 821 Number of subjects studied
- 822 Magnitude and consistency of effects seen
- 823 Balance between positive and negative results.
- 824 Factors which have to be taken into account in order to establish a
- 825 well-established medicinal use of active substances of medicinal
- 826 products are:

- 827 The time over which a substance has been used,
- 828 Quantitative aspects of the use of the substance,
- 829 The degree of scientific interest in the use of the substance
- 830 (reflected in the published scientific literature) and
- 831 The coherence of scientific assessments.
- 832 Lack of information in certain groups of patients (children, elderly,
- 833 women with childbearing potential etc.) should be mentioned.
- 834 No reference to traditional use should be included in this section.

5. Clinical Safety/Pharmacovigilance

- 836 See 'Assessment of clinical safety and efficacy in the preparation of
- 837 EU herbal monographs for well-established and traditional herbal
- 838 medicinal products' (EMA/HMPC/104613/2005) for further details. In
- 839 addition, EMA scientific guidelines on how to interpret and apply the
- 840 requirements for the demonstration of safety set out in the EU
- 841 directives should be taken into consideration.
- 842 In case different safety profile for different preparations,
- 843 populations, duration of use and/or method of administration this
- 844 should be specified e.g. oral use/cutaneous use.

5.1. Overview of toxicological/safety data from market overview

- 846 < Rapporteur to include text>
- 847 Safety information from products on the market should be presented in
- 848 this section.
- 849 <No data available.><The following safety information are included in the SmPC of products on the</p>
- 850 market:>

835

845

854

851 Table <insert number>. Safety information from products marketed in the EU/EEA.

Herbal substance/ preparation	SmPC section	Safety information	Member State

- This overview is not exhaustive. It is provided for information only and reflects the situation at the
- 853 time when it was established.

5.2. Patient exposure

- 855 < Rapporteur to include text>
- 856 This section should provide estimates of the size and nature of the
- 857 population exposed from both clinical studies and post-marketing
- 858 information, if available. This information should be presented by

- 859 formulation or route of administration. Information on patient exposure
- 860 coming from:
- 861 pre-marketing (number of patients in clinical trials, see table
- 862 below)

- 863 post-marketing (information from PSUR)
- 864 Particularly, indicate the safety database for paediatric patients by
- 865 age groups or refer to section 5.5.1.
- 866 Information on the exposure related to uses under other regulatory
- 867 frameworks (food/cosmetics/other products) may also be included.
 - Table < insert number >. Overview of the patient exposure.

	Patients enrolled	Patients exposed	Patients exposed to the proposed dose range	Patients with long term* safety data
Placebo-controlled				
Active-controlled				
Open studies				
Post marketing				

- * In general this refers to 6 months and 12 months continuous exposure data, or intermittent exposure.
- 871 **Assessor's comment:**
- 872 < Rapporteur to include text>
- 873 Discuss any limitations of the safety database in relation to the
- 874 proposed target population. The Rapporteur may consider the possible
- 875 inclusion of the following examples:
- 876 < No data available. >
- 877 <Aside from market presence and data from studies, there are no concrete data concerning patient
- 878 *exposure.*>

879

5.3. Adverse events, serious adverse events and deaths

- 880 < Rapporteur to include text>
- 881 Adverse event(s) from e.g. published case reports, adverse events
- 882 reported in clinical studies, or case reports from pharmacovigilance
- 883 database assessed to be relevant to be included in the monograph (for
- 884 guidance on assessment see e.g. Screening for adverse reactions in
- 885 EudraVigilance EMA/849944/2016). Indicate if non-serious or serious. In
- 886 the assessment of new adverse events, MedDRA terminology and
- 887 classification system should be used, even if the original data source
- 888 is not in accordance with the MedDRA terminology and classification
- 889 system.

- 890 Information on adverse events should usually not be strictly restricted
- 891 to the indications in the monograph. Serious adverse events seen with
- 892 other preparations and posologies than those in the monograph should be
- 893 included when similarity could be expected.
- 894 Results should be given by the System Organ Classification (SOC),
- 895 preferred term (PT).
- 896 In all cases, the relationship between adverse events and reactions
- 897 (causality included) and other variables should be addressed.
- 898 For example, variables may be:
 - Route of administration and product(s) formulation
- Duration of treatment.
- Dose regimen and schedule.
- 902 Time to onset,

909

918

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926

- Rechallenge/dechallenge,
- Biological plausibility (possible mechanism),
- Symptoms of the disease (lack of efficacy)
- Co-medication, i.e. alternative explanation/confounders
- Co-morbidity and co-medication as appropriate.
- 908 Possible class effect,
 - Number of reports and temporal association
- Cumulative and dose related toxicity.
- 911 The quality of the data should be specified (e.g. cases appropriately
- 912 documented with sufficient information about, e.g., suspected herbal
- 913 substance/preparation (including correct plant name), event reported,
- 914 demographics (age and gender), indication, outcome, concomitant
- 915 *medication*).
- 916 Strengths:
- 917 Dose relationship
 - Cases with positive dechallenge/rechallenge
- 919 Plausible time to onset
- 920 Biological and pharmacological plausibility (possible mechanism)
- 921 Evidence from multiple sources, e.g. literature findings
- 922 regarding similar case reports, pharmacoepidemiological studies
- 923 or studies suggestive of a potential mechanism of action
- 924 Weaknesses:
 - Poor data quality of case reports
 - High number of cases with confounding factors / alternative explanations
- 928 Signs of stimulated reporting e.g. increased media attention
- 929 Abnormal reporting pattern
- 930 Presence of other risk factors for the event: underlying disease, 931 co-morbidities, co-medications
- $\,$ <A search in the EudraVigilance database was done < insert date>. It resulted in < insert
- 933 number > hits on < insert search term(s) > . In < insert number > cases the patients had

taken concomitant medicinal products or <insert active substance> was one of several substances in combination products. <Insert further information if needed.> Overall, no new safety issues could be identified from reports in the EudraVigilance database up to <insert date>.>

List clinical studies contributing to safety (could include studies not included in chapter 4). A short statement in the reference that no adverse events were reported with no further information (e.g. on how adverse events were monitored) is not considered sufficient for including the study in this chapter.

Table < insert number>. Clinical safety data from clinical trials where adverse events have been reported.

Reference Aim and objective(s) of study; Reference	Study design Study design; Type of Control;	Treatment Herbal preparation, pharmaceutical form;	Number of subjects	Type of subjects (including age, sex, ethnicity/genetic polymorphism), Healthy or Diagnosis	Adverse events
	Study duration	Dosage Regimen; Route of Administration; Duration of treatment		of Patients (inclusion/exclusion criteria)	

939

940

941

944 **Assessor's comment:**

- 945 | <Rapporteur to include text>
- 946 Conclude on monograph section 4.8 using the EC guidance document 'A
- 947 guideline on summary of product characteristics (SmPC)'. The SOC should
- 948 be followed by the relevant PT. If available, rapporteur to specify the
- 949 frequency of adverse reactions.
- 950 When adverse events are described for posologies or indications not
- 951 included in the monograph, the relevance for the monograph should be
- 952 discussed.

953

5.4. Laboratory findings

- 954 < Rapporteur to include text>
- 955 Information on laboratory findings (results of laboratory testing in
- 956 blood, urine, etc., changes of blood pressure or heart rate or ECG
- 957 parameters) coming from:
- 958 pre-marketing (results of laboratory testing and changes of other
- 959 parameters examined in clinical trials)
- 960 post-marketing (information from PSUR).

961 **Assessor's comment:**

- 962 < Rapporteur to include text>
- 963 The Rapporteur may consider the possible inclusion of the following
- 964 examples.
- 965 < No data available. >
- 966 <The value of <insert parameter> did not change during an <insert number>-month long
- 967 | study (<insert reference to publication>).>

968 **5.5. Safety in special populations and situations**

969 5.5.1. Use in children and adolescents

- 970 < Rapporteur to include text>
- 971 Short summary of all relevant safety information both derived from non-
- 972 clinical and clinical studies in order to substantiate the specific
- 973 statements in the monograph. If detailed information already included
- 974 in another section, please refer to this section.
- 975 Table <insert number>. Overview of exposure in children and adolescents.

	Patients enrolled	Patients exposed	Patients exposed to the proposed dose range	Patients with long term* safety data
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Placebo- controlled		
Active-controlled		
Open studies		
Post marketing		

* In general this refers to 6 months and 12 months continuous exposure data, or intermittent exposure.

Assessor's comment:

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<Rapporteur to include text>

Conclude on monograph sections 4.2 and 4.4. All information in the monograph should be justified.

5.5.2. Contraindications

983 < Rapporteur to include text>

Short summary of all relevant safety information both derived from non-clinical and clinical studies in order to substantiate the specific statements in the monograph. If detailed information already included in another section, please refer to this section.

Assessor's comment:

<Rapporteur to include text>

Conclude on monograph section 4.3. All information in the monograph should be justified and in line with 'A guideline on summary of product characteristics (SmPC)'.

993 **5.5.3. Special warnings and precautions for use**

994 < Rapporteur to include text>

Short summary of all relevant safety information both derived from nonclinical and clinical studies in order to substantiate the specific statements in the monograph. (e.g. gender related differences, effect anticipated or observed elderly, etc.). If detailed information already included in another section, please refer to this section.

Assessor's comment:

<Rapporteur to include text>

Conclude on monograph section 4.4. All information in the monograph should be justified and in line with 'A guideline on summary of product characteristics (SmPC)'.

1005 **5.5.4. Drug interactions and other forms of interaction**

1006 < Rapporteur to include text>

Short summary of all relevant safety information both derived from non-clinical and clinical studies in order to substantiate the specific statements in the monograph. If detailed information already included in another section, please refer to this section.

Assessor's comment:

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<Rapporteur to include text>

Conclude on monograph section 4.5. All information in the monograph should be justified and in line with 'A guideline on summary of product characteristics (SmPC)'.

1015 Cross-reference should be made to sections 3.1.4, 3.2 and 4.1.2 in
1016 this assessment report. However, an interaction supported with
1017 sufficient scientific data but not with sufficient evidence that it
1018 will cause an effect on the efficacy or safety of the preparation in
1019 humans could be relevant for monograph section 4.5 on a case-by-case
1020 basis.

5.5.5. Fertility, pregnancy and lactation

<Rapporteur to include text>

1023 Short summary of all relevant safety information both derived from non-1024 clinical and clinical studies in order to substantiate the specific 1025 statements in the monograph. If detailed information already included 1026 in another section, please refer to this section.

1027 Table <insert number>. Overview of exposure in pregnant and lactating women.

	Patients enrolled	Patients exposed	Patients exposed to the proposed dose range	Patients with long term* safety data
Placebo-controlled				
Active -controlled				
Open studies				
Post marketing				

* In general this refers to 6 months and 12 months continuous exposure data, or intermittent exposure.

Assessor's comment:

<Rapporteur to include text>

Conclude on monograph section 4.6. All information in the monograph should be justified and in line with 'A guideline on summary of product characteristics (SmPC)'.

1035 **5.5.6. Overdose**

1036 < Rapporteur to include text>

1037 **Assessor's comment:**

- 1038 < Rapporteur to include text>
- 1039 Conclude on monograph section 4.9. All information in the monograph should be justified and in line with 'A guideline on summary of
- 1041 product characteristics (SmPC)'.

5.5.7. Effects on ability to drive or operate machinery or impairment of

1043 mental ability

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1044 < Rapporteur to include text>

Assessor's comment:

- 1046 | <Rapporteur to include text>
- 1047 Conclude on monograph section 4.7. All information in the monograph
- should be justified and in line with 'A guideline on summary of
- 1049 product characteristics (SmPC)'.
- 1050 The conclusion should be based on the pharmacodynamic and
- 1051 pharmacokinetic profile, reported adverse reactions and/or specific
- 1052 studies in a relevant target population addressing the performance
- 1053 | related to driving and road safety or using machines.

1054 5.5.8. Safety in other special situations

- 1055 < Rapporteur to include text or insert 'Not available'>
- 1056 Rapporteur to include data of relevance for dosage adjustments or other
- 1057 posology related information in specific patient groups if available,
- 1058 e.g. elderly population; renal impairment; hepatic impairment, patients
- 1059 with a particular genotype; or other relevant special population.

1060 **Assessor's comment:**

- 1061 | <Rapporteur to include text>
- 1062 Dosage adjustments or other posology related information in specific
- patient groups to be included in monograph section 4.2 should be
- 1064 stated if available. 'No information available' in specific patient
- 1065 groups should not be included in the monograph section 4.2.

5.6. Overall conclusions on clinical safety

- 1067 < Rapporteur to include text>
- 1068 In terms of structure, the conclusion should follow the presentation of
- 1069 the results above. Include key findings (or uncertainties) that should
- 1070 be part of the risk assessment. A statement about the conclusions that
- 1071 can be drawn from the clinical safety documentation should be provided

- 1072 here (e.g., most frequent adverse reactions and other significant 1073 safety issues). For example:
- 1074 Discuss any limitations of the safety database in relation to the proposed target population.
- 1076 Recall concerns identified in non-clinical studies with potential for human use.
- How are the findings (or lack of information) reflected in the monograph? Discuss actions needed to address important findings or limitations in the monograph (e.g. contraindications, warnings, restriction of indication). Ensure correspondence with monograph sections 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, as appropriate) and that all information in the monograph is explicitly assessed and supported by the scientific assessment.
 - Describe relevant safety aspects specific for the paediatric population by age group where appropriate. Ensure correspondence with the recommendations in the monograph.
- 1088 In case different safety profile for different preparations or 1089 populations and/or duration of use this should be specified e.g. oral 1090 use/cutaneous use.

6. Overall conclusions

1092 < Rapporteur to include text>

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- 1093 Describe key aspects only briefly, these will already have been
- 1094 described in detail in the respective sections. This section should
- 1095 cover all recommended 'well-established use' and 'traditional use'
- 1096 indications and conclusions shall be provided for each therapeutic
- 1097 indication and each herbal preparation. Importantly, the main
- 1098 conclusions from section 2.3, 3.4, 4.4 and 5.6 should be summarised.
- 1099 Statement on the presence of constituents with safety concerns (such as
- 1100 estragole) should be given. Ensure correspondence with the
- 1101 recommendations in the monograph.

1102 Well established use monograph

- 1103 The clinical studies supporting well-established use should be
- 1104 specified for each therapeutic indication and each herbal preparation.
- 1105 If well-established use was not accepted, the reasons should be stated.
- 1106 The conclusion should justify whether all the requirements for WEU
- 1107 (period of medicinal use, acceptable level of safety, recognised
- 1108 efficacy, quantitative aspects of the use of the substance and the
- 1109 degree of scientific interest in its use) are met or what important
- 1110 data is missing.
- 1111 The following proposals on the final conclusion should be considered
- 1112 and finalised in the end of this section:

<The requirements for well-established use according to Article 10a of Directive 2001/83/EC are</p>
considered <not> fulfilled.> < The available safety and efficacy data <do not> support an use of the
<herbal substance> <and> <herbal preparation(s)> in accordance with the conditions of use as
specified in the European Union herbal monograph:>

Herbal substance/ preparation	Indication	ATC code	Posology and method of administration	Duration of use
As to be presented in a monograph	As to be presented in a monograph			

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- 1118 Insert the chosen proposed ATC code for each WEU indication.
- 1119 Insert a summary that correspond to the recommendations in the
- 1120 monograph, especially safety concerns should be clearly presented in
- 1121 the conclusion. In particular, the specified conditions of use,
- 1122 including special warnings and/or contraindications should be
- 1123 summarised.

Traditional use monograph

- 1125 The conclusion should justify whether all the requirements for TU
- 1126 (self-medication character, specified strength/posology, appropriate
- 1127 route of administration, period of traditional use, and safety) are
- 1128 met. The choice for the wording of traditional use indications vis-à-
- 1129 vis existing wordings in monographs in the same therapeutic area should
- 1130 be briefly discussed/justified. See also 'Public statement on the
- 1131 interpretation of therapeutic indications appropriate to traditional
- 1132 herbal medicinal products in Community herbal monographs'
- 1133 (EMA/HMPC/473587/2011)
- 1134 A specific conclusion should be presented on the risks in the specified
- 1135 conditions of use, including special warnings and/or contraindications.
- 1136 The following proposals on the final conclusion should be considered
- 1137 and finalised in the end of this section:
- 1138 < The requirements for traditional medicinal use according to Article 16d(1), Article 16f and Article 16h</p>
- 1139 of Directive 2001/83/EC are considered <not> fulfilled.> <It has been demonstrated that <insert>
- have been in traditional medicinal use throughout a period of at least 30 years, including at least 15
- 1141 years within the EU/EEA, with an acceptable level of safety for:>

Herbal substance/preparation	Indication	Therapeutic area for browse search	Posology and method of administration	Duration of use
As to be presented in a monograph	As to be presented in a monograph		As to be presented in a monograph	As to be presented in a monograph

- 1143 Insert the chosen therapeutic area for browse search for each TU
- 1144 indication (see browser on the EMA web for available therapeutic areas
- 1145 and the Matching patients friendly therapeutic areas for browse search
- 1146 on herbal medicines for human use with ATC therapeutic groups (level 2)
- 1147 (EMA/568320/2009)).
- 1148 Insert a summary that correspond to the recommendations in the
- 1149 monograph, especially safety concerns should be clearly presented in
- 1150 the conclusion. In particular, the specified conditions of use,
- 1151 including special warnings and/or contraindications should be
- 1152 summarised.
- 1153 List entry
- 1154 The conclusions should include a statement pointing to the
- 1155 possibility/non-possibility to support a European Union list entry.
- 1156 The Rapporteur may consider the possible inclusion of the following
- 1157 examples when a list entry is supported.
- 1158 <The data on safety are considered sufficient to support a European Union list entry for the <above
- 1159 mentioned> <following> herbal preparations and indications.>
- 1160 <A European Union list entry for <insert text> is supported only for <adolescents over 12
- 1161 years,><adults and elderly>, considering the small amount of <insert name of
- 1162 constituent(s)/preparation(s) with safety concerns> in < insert herbal
- 1163 preparation> prepared from <insert herbal substance>.>
- 1164 <A European Union list entry for <insert text> is supported only in <insert indication>,
- 1165 considering the <small><negligible> amount of <insert name of
- 1166 constituent(s)/preparation(s) with safety concerns><compared to the
- background exposure due to <food intake> <or> <and> <cosmetic use>> when
- 1168 <administered><taken>< used> at the specified posology.>
- 1169 The Rapporteur may consider the possible inclusion of the following
- 1170 examples when a list entry is not supported.
- 1171 <A European Union list entry is not supported due to lack of <adequate> data on genotoxicity.>
- 1172 <Tests on genotoxicity have been performed <with <insert herbal
- 1173 substance/preparation>> <and><or><with the isolated <substance><substance>>

- 1175 substance/preparation>. Therefore a European Union list entry cannot be supported due to
- 1176 lack of adequate data.>

1178 <Annex><Annexes>

List of references

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1180 All references supporting the assessment report should be attached as a 1181 separate document (using appropriate template) and, if applicable, 1182 including in a separate section the references which were read but do 1183 not support the assessment report.

Assessment report on <plant, plant part> EMA/HMPC/418902/2005