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4 **Guideline on the assessment of clinical safety and efficacy**  
5 **in the preparation of European Union herbal monographs**  
6 **for well-established and traditional herbal medicinal**  
7 **products<sup>1</sup>**  
8 Draft revision 1

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9 Comments should be provided using this [template](#). The completed comments form should be sent to [hmpc.secretariat@ema.europa.eu](mailto:hmpc.secretariat@ema.europa.eu)

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<sup>1</sup> For traditional herbal medicinal products this guideline is also applicable in the preparation of list entries according to Art. 16f(1) and Art. 16h of Directive 2001/83/EC as amended.



12 Guideline on the assessment of clinical safety and efficacy  
13 in the preparation of European Union herbal monographs  
14 for well-established and traditional herbal medicinal  
15 products

16 **Table of contents**

17	<b>Executive summary .....</b>	<b>3</b>
18	<b>1. Introduction (background) .....</b>	<b>3</b>
19	<b>2. Scope.....</b>	<b>4</b>
20	<b>3. Legal basis .....</b>	<b>4</b>
21	<b>4. Recommendations for implementation .....</b>	<b>5</b>
22	4.1. Guidance on monographs for well-established herbal medicinal products.....	5
23	4.2. Guidance on monographs and on the list of traditional herbal substances/preparations .	8
24	<b>5. Clinical safety .....</b>	<b>10</b>
25	<b>6. Reference to other products .....</b>	<b>11</b>
26	6.1. Active substances.....	11
27	6.2. Medicinal products.....	11
28	6.3. Additional considerations for well-established and traditional herbal medicinal products	
29	.....	12
30	<b>Definitions.....</b>	<b>12</b>
31	<b>References .....</b>	<b>12</b>
32		

## 33 **Executive summary**

34 This guideline describes the legal background and recommendations for the assessment of data that  
35 are used to prepare European Union herbal monographs (formerly called Community herbal  
36 monographs) on herbal medicinal products and the European Union list of herbal substances,  
37 preparations and combinations thereof for use in traditional herbal medicinal products. The areas of  
38 herbal medicinal products with well-established medicinal use and traditional herbal medicinal products  
39 are addressed.

40 **Revision 1** pertains to an update of the document to current standards taking into account advances  
41 over the last 10 years and established practice and legal interpretations. Developments and details in  
42 the assessment methodology have so far been mainly reflected in template revisions (such as  
43 Assessment report template), but also other documents such as the public statement  
44 EMA/HMPC/473587/2011. In addition to the alignment with other documents the revision aimed for  
45 improved clarity and transparency by shortening some sections or providing more detail on some  
46 particular aspects of the assessment process, e.g. as regards specific population groups.

## 47 **1. Introduction (background)**

48 The establishment of EU herbal monographs for well-established and for traditional herbal medicinal  
49 products is a major task given to the HMPC by the pharmaceutical legislation. HMPC is also responsible  
50 for the preparation of draft entries to the EU list of herbal substances, preparations and combinations  
51 thereof for use in traditional herbal medicinal products. Both types of documents are essential to  
52 promote EU harmonisation in the area of herbal medicinal products, to facilitate marketing  
53 authorisation and registration, and to provide information to health care providers and consumers.

54 The assessment of herbal medicinal products presents specific challenges in different scientific areas.  
55 Herbal substances/preparations are complex mixtures of constituents and any assessment of safety  
56 and/or efficacy must rely on an adequate pharmaceutical documentation. Additional and even more  
57 difficult challenges exist in the assessment of clinical safety and efficacy. Many herbal medicinal  
58 products have been used for several decades or even hundreds of years. This long period of use has, in  
59 many cases, created a comprehensive body of experience laid down in published literature. This  
60 bibliography reflects the scientific standards of phytotherapy at the time of publication and may not be  
61 fully in line with modern methodology and reporting standards. Despite these deficiencies, long-  
62 standing experience may have a scientific value, if the quality and credibility of the bibliographic data  
63 are carefully assessed.

64 Careful consideration is also necessary to define the borderline between herbal substances/  
65 preparations with a well-established medicinal use and those with a traditional use. The EU legislation  
66 defines a framework covering both areas. This guideline is intended to give advice for assessing data  
67 on well-established and traditional herbal medicinal products and the corresponding herbal  
68 substances/preparations in the framework of drafting EU monographs or the EU list. It should be read  
69 in conjunction with the general requirements set out by Directive 2001/83/EC, in particular its Annex I,  
70 and general methodological requirements published by the EMA. A template with instructions and  
71 informative notes for the development of uniform assessment reports has been issued by the HMPC.

## 72 2. Scope

73 The guideline deals with the assessment of clinical safety and efficacy and applies to the drafting of EU  
74 monographs for well-established and traditional herbal medicinal products and of the EU list of  
75 traditional herbal substances, preparations and combinations thereof.

## 76 3. Legal basis

77 Following Article 16 h (3) of Directive 2001/83/EC the Committee for Herbal Medicinal Products shall  
78 establish EU herbal monographs for herbal medicinal products with regard to well-established  
79 medicinal use as well as traditional herbal medicinal products. When EU herbal monographs have been  
80 established, they shall be taken into account by the Member States when examining an application for  
81 marketing authorisation or for registration. Where no EU herbal monograph has yet been established,  
82 other appropriate publications or data may be referred to. When new EU monographs are established,  
83 the authorisation/registration holder shall consider whether it is necessary to modify the  
84 authorisation/registration dossier accordingly.

85 A EU herbal monograph may result from the referral to the HMPC by a Member State of an application  
86 for simplified registration of a product that has been used for less than 15 years in the EU (Article  
87 16(c)(4). The monograph will be taken into account by the Member State when taking its final  
88 decision.

89 Following Article 16 f (1) of Directive 2001/83/EC, the HMPC prepares a draft list of herbal substances,  
90 preparations and combinations thereof for use in traditional herbal medicinal products that will be  
91 adopted through the procedure described in Article 121(2) of the same Directive. If a herbal  
92 substance, preparation or combination is included in the list, no further data on the time and extent of  
93 traditional use and on safety are required for the simplified registration (Article 16(f)(2)). For  
94 cutaneous products additional data on local tolerance might be necessary.

95 The criteria for the preparation of both types of documents and the information needed to support their  
96 content are the same as for any individual application for marketing authorisation/simplified  
97 registration submitted by an applicant to national authorities. Thus, the following legal provisions apply  
98 by analogy to the preparation and to the assessment of data/information to support the drafting of EU  
99 herbal monographs and the EU list.

100 Article 10a and Annex 1 of Directive 2001/83/EC clarify the legal basis of applications for marketing  
101 authorisation of well-established and for registration of traditional herbal medicinal products as follows:

102 By way of derogation of Article 8(3)(i) the results of non-clinical tests or clinical trials are not required  
103 if it can be demonstrated that the active substances of the medicinal product have been in well-  
104 established medicinal use within the EU for at least ten years, with recognised efficacy and an  
105 acceptable level of safety in terms of the conditions set out in Annex I. In that event, the test and trial  
106 results shall be replaced by appropriate scientific literature. The detailed scientific bibliography shall  
107 address non-clinical and clinical characteristics.

108 Factors which have to be taken into account in order to establish a **well-established medicinal use**  
109 of active substances of medicinal products are:

- 110 - The time over which a substance has been used,
- 111 - Quantitative aspects of the use of the substance,
- 112 - The degree of scientific interest in the use of the substance (reflected in the published scientific  
113 literature) and

114 - The coherence of scientific assessments.

115 Therefore different periods of time may be necessary for establishing well-established use of different  
116 substances. In any case, however, the period of time required for establishing a well-established  
117 medicinal use of a herbal substance/herbal preparation must not be less than one decade from the first  
118 systematic and documented use of that substance as a medicinal product in the EU.

119 By analogy to the content of Modules 4 and 5 of Annex 1 of the Directive 2001/83/EC, a detailed  
120 scientific bibliography shall address non-clinical and clinical characteristics. The documentation should  
121 cover all aspects of the safety and efficacy assessment and must include or refer to a review of the  
122 relevant literature, taking into account pre-and post-marketing studies and published scientific  
123 literature concerning experience in the form of epidemiological studies and in particular of comparative  
124 epidemiological studies. All documentation, both favourable and unfavourable, must be assessed. With  
125 respect to the provisions on 'well-established medicinal use' it is in particular necessary to clarify that  
126 'bibliographic reference' to other sources of evidence such as post marketing studies, epidemiological  
127 studies etc. and not just data related to tests and trials may serve as a valid proof of safety and  
128 efficacy of a herbal medicinal product if the use of these sources of information is satisfactorily  
129 explained and justified.

130 Particular attention must be paid to any missing information and justification must be given why  
131 demonstration of an acceptable level of safety and/or efficacy can be supported although some studies  
132 are lacking. According to the Directive, the non-clinical and/or clinical overviews of an application must  
133 explain the relevance of any data submitted which concern a product different from the product  
134 intended for marketing. A judgement must be made whether the product studied can be considered as  
135 similar to the product, for which application for a marketing authorisation has been made in spite of  
136 the existing differences. By analogy in the preparation of a monograph, the rapporteur should assess if  
137 the products reported on the EU market by the NCAs in the market overview can be considered as  
138 similar to the product studied in pivotal non-clinical and clinical studies found in the literature.

139 Post-marketing experience with other products containing the same active substance(s) is of particular  
140 importance and the assessor should put a special emphasis on this issue.

## 141 **4. Recommendations for implementation**

### 142 ***4.1. Guidance on monographs for well-established herbal medicinal*** 143 ***products***

144 According to Article 10 (a) of Directive 2001/83/EC as amended, a dossier in which the results of own  
145 non-clinical and clinical tests have been replaced by detailed references to published scientific  
146 literature, including EU herbal monographs prepared by the HMPC, may be the basis for assessment.  
147 The procedure for drafting monographs and the criteria for assessment are, in many aspects, similar to  
148 the preparation and assessment of a non-clinical and clinical part of a bibliographic application for  
149 marketing authorisation or of a dossier for registration of a traditional herbal medicinal product. For  
150 'well-established' herbal medicinal products *all conditions* set out in Annex I, Part II (1) have to be  
151 fulfilled. The concept relies on the thinking that the wide-spread medicinal use of a product within the  
152 EU for at least 10 years may have generated a sufficient body of conclusive scientific literature that will  
153 allow an assessment of safety and efficacy. In most cases, the product has been granted a marketing  
154 authorisation and data on pharmacovigilance will be available. Experience resulting from  
155 pharmacovigilance will be crucial for the assessment of clinical safety. The legislation allows that a  
156 broad spectrum of evidence may be used in the assessment of efficacy. All aspects of safety and/or  
157 efficacy included in module 4 and 5 have to be addressed and the assessment must include or refer to

158 a review of the relevant literature. If information related to a specific aspect is lacking, it is necessary  
159 to assess if the safe use of the active substance described in the monograph can be justified. If such a  
160 justification cannot be provided, a monograph should address those areas where information is  
161 missing.

162 In the assessment of well-established herbal medicinal products/substances all bibliographic  
163 documents, including bibliography that is specific to phytotherapy, should be taken into consideration.  
164 The following type of documents might be used: controlled clinical trials, other clinical trials, cohort or  
165 longitudinal studies, observational (non-interventional) studies, case-control-studies, other collections  
166 of single cases allowing a scientific evaluation, scientifically documented medical experience, for  
167 example scientific literature and appropriate monographs. The quality and the consistency of these  
168 bibliographic data must be assessed in order to establish if they can demonstrate a sufficient level of  
169 safety and efficacy.

### 170 **Elements of the clinical data supporting a monograph**

171 The clinical data should include/address the following elements:

172 A systematic review of all relevant clinical data available for the herbal medicinal product/substance  
173 must be performed and reflected in the assessment report and list of references.

174 A scientific assessment of the clinical data must be performed and reflected in the assessment report.  
175 Results of all clinical data included in the systematic review shall be taken into account. Old reports  
176 should be judged for their scientific credibility. Coherent and conclusive clinical recommendations  
177 cannot be obtained if major methodological deficiencies are identified in the pivotal clinical data.

178 It must be demonstrated that the clinical data report a clear description of the herbal  
179 substance/preparation, cover a sufficient number of patients (for each age group if it is the case) and  
180 that they are conclusive and coherent with respect to the indication, safety and efficacy.

181 The clinical relevance of the documented efficacy of the product/substance must be assessed.

182 In general, at least one controlled clinical study (clinical trial, post-marketing study, epidemiological  
183 study) of good quality is required to substantiate efficacy.

184 Table 1 gives the data structure in the assessment report template which is used for the evaluation of  
185 the quality of a clinical study.

186 Table 1

References	Author, year, country
Study design	
Type of control	
Aim and Objectives	
Herbal preparation	Pharmaceutical form
	Dosage regimen
	Route of administration
Duration of treatment	
Subjects (n°)	Inclusion criteria
	Range and Medium Age
	Age group
	Sex
	Drop out

References	Author, year, country
Outcomes and endpoints	Primary
	Secondary
Statistical analysis data	ITT(y/n), C.I, quality score
Comments on results	

187

188 For some products/substances, several controlled clinical studies of good or acceptable quality may be  
189 available, and sometimes the results may be contradictory. The fourth bullet point of the Directive's  
190 text as regards relevant factors, 'coherence of scientific assessments' (see Section 3 above), then  
191 becomes applicable. The studies with positive outcomes must be balanced against the ones with  
192 negative outcomes. Meta-analyses of the results of the different trials may be useful for this purpose if  
193 the studies taken into account regard the same herbal preparation. Often published meta-analyses  
194 include trials performed on widely different herbal preparations (although of the same plant material),  
195 or not completely described preparations, and in such a case the meta-analysis may be considered of  
196 less importance for the monograph in question. It should be noted that the guideline's requirement of  
197 'one controlled clinical study of good quality' to substantiate efficacy does not mean that one such  
198 study *per se* is sufficient to settle that a substance has a 'well-established medicinal use'. Such a  
199 clinical study is expected to be part of the information, but the concept of 'well-established medicinal  
200 use' relies on the broader thinking that a wide-spread medicinal use of a product within the EU for at  
201 least 10 years may have generated a sufficient body of conclusive scientific literature to allow an  
202 assessment of its efficacy. If the total body of evidence that emerges upon assessment leads to the  
203 conclusion that the substance has a 'recognised efficacy', the substance may be concluded to have a  
204 'well-established medicinal use' from an efficacy point of view. Data relating solely to *in vitro*  
205 pharmacology or general pharmacology in animals will not provide evidence of efficacy to allow the  
206 development of a 'well-established use-monograph'. Such data may, however, contribute to the  
207 credibility of the clinical efficacy data of the product/substance.

208 Information on the time over which the substance has been used and quantitative aspects of the use of  
209 the substance must be assessed. In most cases, the herbal medicinal product or a similar one (see  
210 Section 6 below) will have been authorised in the EU for more than 10 years. If, in exceptional cases,  
211 no marketing authorisation has been granted in the EU, it must be clarified, under which conditions a  
212 substantial, wide use as a medicinal product throughout a period of time of 10 years within the EU has  
213 taken place.

214 Data on the time and use aspects may be in form of: information on authorisation/registration by  
215 national competent authorities, information from handbooks (medicine, pharmacy, pharmacology,  
216 pharmacognosy, phytotherapy, herbal medicine etc.), scientific monographs, and specific product  
217 related information, such as approved SmPCs, sales statistics, estimated number of users, etc. Unless  
218 available data indicate otherwise, the publication year of the information will be accepted as proof of  
219 medicinal use from that year on.

## 220 **Therapeutic indications**

221 There are no restrictions on the indications for herbal medicinal products with 'well-established  
222 medicinal use'. However, the clinical evidence and the data should be appropriate to the nature of the  
223 indication(s) and to the risks of the herbal substance/preparation. The risks of delayed or insufficient  
224 treatment should be taken into account. Products can be for use under medical supervision or for self-  
225 medication. The therapeutic indication for a herbal medicinal product with well-established medicinal  
226 use should normally be introduced in the following way: 'Herbal medicinal product for ...'.

227 **4.2. Guidance on monographs and on the list of traditional herbal**  
228 **substances/preparations**

229 In essence, Directive 2004/24/EC introduced the legal basis to register so-called 'traditional' herbal  
230 medicinal products for human use. Article 16c (c) of Directive 2001/83/EC requires a documented  
231 medicinal use throughout a period of at least 30 years preceding the date of application, including at  
232 least 15 years within the EU. There is no requirement that this evidence should relate to the 30 years  
233 immediately preceding the date of application. However, if the documentation does not contain  
234 evidence of recent usage of the product but instead refers to a period many years earlier, it is likely  
235 that such evidence would be of considerably less value in helping to demonstrate plausibility of  
236 indications and safety of the product. The requirement to demonstrate 30/15 years of medicinal use  
237 does not relate to a marketing authorisation. Other herbal products that have been in medicinal use,  
238 as defined by Article 1 (2) or Article 2 (2) of Directive 2001/83/EC, may be registered as a traditional  
239 herbal medicinal product.

240 The basic requirements encompass that the product is not harmful under normal conditions of use,  
241 fulfils the requirements on pharmaceutical quality and has an efficacy that is plausible on the basis of  
242 long-standing use. The indication must be such that no medical supervision is needed for diagnosis,  
243 prescription or monitoring of the treatment.

244 The requirement to demonstrate 'plausibility' and to exclude direct and indirect risks introduces a  
245 request for careful assessment of the indication proposed.

246 A well-documented, consistent and long-standing use over at least 30/15 years will provide the basis  
247 for acceptance of an indication. An indication 'exclusively based upon long-standing use' may be  
248 plausible, even if no supporting scientific data are available. Evidence on the consistent use should  
249 include a well-defined posology (for specific age groups if available), administration form and  
250 indication. If a traditional herbal medicinal product has long fallen into disuse, this might indicate that  
251 in practice the efficacy of the traditional herbal medicinal product is not plausible.

252 The following types of bibliographical or/and expert evidence may be used:

- 253 - Excerpts from archives of national competent authorities showing that a product containing a  
254 defined herbal substance/preparation has been approved (authorised or registered) for medicinal  
255 purposes (for specific age groups if available). The product may have been approved nationally  
256 under different types of legislation (not necessarily as medicinal products) and have different  
257 designations such as herbal medicinal product, herbal remedy, natural remedy, healing product,  
258 traditional herbal drug on a national list etc. The product may have been regulated under national  
259 legislation applicable to food or to cosmetics. The excerpt from the archive may contain all  
260 necessary information, but particular attention should be given to information on which years the  
261 product was approved for human use. Unless available data indicate otherwise, the publication  
262 year of the information will be accepted as proof of medicinal use from that year on. In the case of  
263 official pharmacopoeias or formularies of EU Member States, a continuous use is expected for the  
264 period of validity of the corresponding pharmacopoeia monograph. The use of the medicinal  
265 product in a medicinal context in the EU throughout a period of at least 15 years must be  
266 demonstrated.
- 267 - A comprehensive literature search, especially in medical and toxicological databases, with the main  
268 focus on safety aspects.
- 269 - Information from handbooks of medicine, pharmacy, pharmacology, pharmacognosy,  
270 phytotherapy, herbal medicine etc. Information on therapeutic indication, type of



- 271 preparation/strength, posology, and specific information on safe use will typically be found in  
272 handbooks.
- 273 - Official expert committee reports or monographs from learned societies, such as WHO,  
274 Commission E, ESCOP and national formularies/compendia etc. Information on therapeutic  
275 indication, type of preparation/strength, posology, and specific information on safe use are usually  
276 found in such reports/monographs.
- 277 - A monograph in Ph. Eur. or an official national pharmacopoeia will be accepted as a general proof  
278 of medicinal use during the years the monograph has been valid. It may also provide relevant  
279 information on strength/type of extract. Usually no information on therapeutic indications,  
280 posology, or safety will be found in pharmacopoeia monographs, so this information must be  
281 obtained from other sources of that time.
- 282 - Product related documentation, such as post marketing studies, product information leaflets, sales  
283 catalogues, sales statistics, etc.

284 The assessor should make a compilation of the available information above and based on that a  
285 therapeutic indication, posology and specific safety information for the product in question should be  
286 proposed. Only oral, external and/or inhalation preparations are within the scope of the simplified  
287 registration scheme. It is recognised that the requested information from the different sources given  
288 above may be dated many years back in time and may be incomplete and partly contradictory. It is  
289 nevertheless important that the requested information is presented in a transparent way and that the  
290 assessor as far as possible explains and justifies the proposed therapeutic indication, strength,  
291 posology and specific information on safe use.

292 In summary, 5 pivotal pieces of information must be compiled:

- 293 a) period of medicinal use,  
294 b) therapeutic indication,  
295 c) strength/type of preparation,  
296 d) posology,  
297 e) specific information on safe use and evidence of safety.

298 The above information should be specified for different age groups, if such information is available.

299 The documentation must give a clear indication that the medicinal use of the product has been a  
300 continuum for the required time period of 30/15 years and that the use has been reasonably consistent  
301 during that time. It may again be emphasised that the basis for accepting a product as a traditional  
302 herbal medicinal product lies within the fact that it has been used in humans for a certain medicinal  
303 purpose during a long period of time and that there are no indications that it is harmful under normal  
304 conditions of use.

305 In those cases, where a monograph results from a referral by a Member State, the referring Member  
306 State will submit all relevant scientific documentation to support the referral. The assessor should  
307 consider if the draft assessment report prepared by the Member State and the submitted data fully  
308 support the safe use in the proposed traditional indication, despite the fact that only limited data on  
309 human exposure in the EU may be available.

### 310 **Therapeutic indications for traditional herbal medicinal products**

311 In principle all indications that can be considered safe for the user without the supervision of a medical  
312 practitioner for diagnostic purposes or prescription or monitoring of treatment are possible. This would

313 include minor disorders or symptoms that are of benign or self-limiting character. Preferably, the  
314 therapeutic indication should clearly define the target disease or condition. It is important to assess if  
315 the symptoms can be easily recognised/diagnosed by the layman and if delayed contact with a medical  
316 practitioner due to attempted self-medication may lead to risks for the patient. Therapeutic indications  
317 that involve serious diseases, disorders or conditions such as cancer, psychiatric diseases /disorders,  
318 infectious diseases such as hepatitis or influenza, cardio-vascular diseases such as heart failure,  
319 metabolic diseases such as diabetes etc. are not acceptable. However, a disease or condition that *per*  
320 *se* is not considered serious, but displays symptoms that are common to a serious disease, may be  
321 acceptable for a traditional herbal medicinal product provided that the patient is requested to consult a  
322 physician before use of the product to exclude that serious disease is causing the symptoms. An  
323 example of such an indication is 'Traditional herbal medicinal product for the relief of lower urinary  
324 tract symptoms related to benign prostatic hyperplasia after serious conditions have been excluded by  
325 a medical doctor.' Other therapeutic indications that may be acceptable 'after exclusion of serious  
326 conditions by a medical doctor' include e.g. prophylaxis of migraine headache, reduction of heavy  
327 menstrual bleeding in women with regular menstrual cycles, symptomatic relief of itching and burning  
328 associated with haemorrhoids and relief of lower urinary tract symptoms related to an overactive  
329 bladder. Each indication needs a careful medical evaluation and decisions should be taken on a case-  
330 by-case basis.

331 Claims such as 'radical scavenger' and/or 'antioxidant' are not considered appropriate. Claims relating  
332 to clinical parameters such as the cholesterol-level, blood pressure, immune status etc. require robust  
333 scientific data and are not considered appropriate for that reason. The therapeutic indication for a  
334 traditional herbal medicinal product should be given in the following way:

335 'Traditional herbal medicinal product used for...

336 The product is a traditional herbal medicinal product for use in specified indications exclusively based  
337 upon long-standing use.'

338 Indications that are too general and that might be considered misleading are not acceptable, e.g.  
339 'promotion of good health', 'to give general strength' etc.

340 Therapeutic indications solely based on pharmacological actions/effects traditionally attributed to the  
341 herbal substance/preparation (e.g. diuretic, analgesic or spasmolytic) should not be used.

342 Indications relating to specific concepts of traditional medicines may be acceptable if they fulfil the  
343 criteria given for safe self-medication.

## 344 5. Clinical safety

345 For **well-established herbal medicinal products** all items addressed in Annex 1 of Directive  
346 2001/83/EC related to clinical safety should be addressed. Serious risks, e.g. case reports of serious  
347 ADR, must be balanced by sufficient evidence of an appropriate benefit.

348 For **traditional herbal medicinal products**, evidence of widespread, long-standing use without  
349 significant safety problems, is the core element of the safety assessment. Deficiencies in available  
350 information must be clearly identified. If a traditional herbal medicinal product had long fallen into  
351 disuse, this might of itself raise questions as to whether this was due to safety concerns.

352 For both **well-established and traditional herbal medicinal products**, the assessment must  
353 address the situation of special patient populations especially of children and pregnant/lactating  
354 women. As far as children are concerned, any kind of clinical study, referred to specific age groups,  
355 can be taken into account, as a complement to clinical safety information (e.g. from pharmacovigilance

356 and scientific literature) generated during longstanding use of the herbal medicinal product in the  
357 specific age group.

358 Concerning risk assessment of use of a herbal medicinal product in relation to reproduction and  
359 lactation, and the wording of section 4.6 Fertility, pregnancy and lactation of the monograph, the  
360 CHMP guideline 203927/2005 should be taken into account.

## 361 **6. Reference to other products**

### 362 **6.1. Active substances**

363 The assessment report and the monograph/list must clearly address and reflect the different herbal  
364 preparations studied or described in literature.

#### 365 **Well-established herbal medicinal products**

366 Because herbal substances/preparations are complex mixtures of constituents, e.g. herbal extracts  
367 produced by different manufacturers are never identical, the following aspects must be considered:  
368 Assessment of comparability must include details of composition, available data on the specification of  
369 the preparation and information on the manufacturing process. The specification and manufacturing  
370 process is particularly important in those cases where bibliographic data on highly purified extracts are  
371 presented or where a new method of preparation of an extract is used. In the case of 'classical' herbal  
372 drug preparations such as tinctures and extracts described in pharmacopoeias and used for long time,  
373 a 'comprehensive' specification will not be available from published literature in most cases. For these  
374 preparations the starting material, the extraction solvent and the drug/extract ratio should be  
375 comparable. Reference is made to the 'Guideline on specifications: Test procedures and Acceptance  
376 Criteria for Herbal Substances, Herbal Preparations and Herbal Medicinal Products/Traditional Herbal  
377 Medicinal Products' and to the 'Guideline on Quality of Herbal Medicinal Products/Traditional Herbal  
378 Medicinal Products'. If there are reasons to expect different pharmacological or toxicological profiles for  
379 otherwise comparable preparations, specific limits for substances of pharmacological or toxicological  
380 concern may be given in the monograph.

#### 381 **Traditional herbal medicinal products**

382 As the legislation refers to the 'same active substances' the herbal substance/herbal preparation must  
383 be the same in terms of the declaration of active substances. This will at least include the plant/part of  
384 the plant, the type of herbal preparation and, for extracts, the primary solvent.

### 385 **6.2. Medicinal products**

#### 386 **Well-established herbal medicinal products**

387 The relevance of any data which concern a product/active substance different from the product/active  
388 substance reflected in the monograph/list needs to be discussed. A judgement must be made whether  
389 the product/active substance studied can be considered as similar to the product/active substance for  
390 which an inclusion into the monograph is intended in spite of the existing differences.

#### 391 **Traditional herbal medicinal products**

392 Reference can be made to a 'corresponding product' having:

- 393 - the same active ingredients, irrespective of the excipients,
- 394 - the same or similar intended purpose,

395 - the equivalent strength and posology,

396 - the same or similar route of administration.

397 If no comparable product is currently marketed, reference to scientific reference handbooks, official  
398 compendia for prescriptions (e.g. *Formulae normales*) or official pharmacopoeias of Member States is  
399 acceptable.

400 Evidence on the traditional use of the single active substances of a fixed combination will not be  
401 sufficient to establish a traditional use of a combination product.

402 The requirement for evidence of traditional use is also satisfied, if the number or the quantity of  
403 ingredients has been reduced during the time of traditional use. However, elimination of active  
404 ingredients or a significant reduction in posology may make it difficult to accept the 'plausibility' of the  
405 pharmacological effects or efficacy of the remaining product and a justification of the acceptability  
406 should be given. Such a justification may consist of additional data confirming long-standing use and  
407 experience of the remaining ingredient(s).

408 Data on combination products can be taken into account for safety assessment of a single herbal  
409 substance/preparation, if justified in the assessment report.

### 410 **6.3. Additional considerations for well-established and traditional herbal** 411 **medicinal products**

412 Additional information on the biopharmaceutical characterisation may be necessary.

413 The efficacy and safety of preparations for topical use strongly depends on the galenical preparation  
414 and on the excipients. Additional data on clinical safety/local tolerance (marketing authorisation and  
415 registration) and on efficacy (marketing authorisation) may be necessary.

416 Similar considerations may be applicable for herbal medicinal products intended for inhalation if the  
417 method of administration differs from the traditional one or the method described in literature, e.g.  
418 ultrasound nebuliser versus steam inhalation.

419 As no additional safety data can be required in applications for traditional use registration if a herbal  
420 substance/preparation or combination is included in the EU list, the drafting of a list entry will not be  
421 possible if additional information is necessary to establish the safe use.

## 422 **Definitions**

423 For definitions reference is made to the relevant guidelines on quality (see below).

## 424 **References**

425 Directive 2001/83/EC as amended

426 Procedure for the Preparation of EU monograph for traditional herbal medicinal products  
427 (EMA/HMPC/182320/2005 Rev. 2)

428 Procedure for the Preparation of EU monograph for herbal medicinal products with well-established  
429 medicinal use (EMA/HMPC/182352/2005 Rev. 2)

430 Structure of the list of herbal substances, preparations and combinations thereof  
431 (EMA/HMPC/100824/2005 Rev. 1)

- 432 Guideline on the documentation to be submitted for inclusion into the list of Herbal substances,  
433 preparations, and combinations thereof (EMA/HMPC/107399/2005 Rev. 1)
- 434 Template for a EU herbal monograph (EMA/HMPC/107436/2005 Rev. 7)
- 435 Guideline on Non-Clinical Documentation for Herbal Medicinal Products in Applications for Marketing  
436 Authorisation (Bibliographical and Mixed Applications) and in Applications for Simplified Registration  
437 (EMA/HMPC/32116/05)
- 438 Guideline on the Clinical Assessment of fixed Combinations of Herbal Substances/Herbal Preparations  
439 EMA/HMPC/166326/05
- 440 Guideline on specifications: Test procedures and Acceptance Criteria for Herbal Substances, Herbal  
441 Preparations and Herbal Medicinal Products/Traditional Herbal Medicinal Products CPMP/QWP/2820/00  
442 Rev. 2 (EMA/CVMP/815/00 Rev. 2; EMA/HMPC/162241/2005 Rev. 2)
- 443 Guideline on Quality of Herbal Medicinal Products/Traditional Herbal Medicinal Products  
444 CPMP/QWP/2819/00 Rev. 2 (EMA/CVMP/814/00 Rev. 2, EMA/HMPC/201116/2005 Rev. 2).
- 445 Public statement on the interpretation of therapeutic indications appropriate to traditional herbal  
446 medicinal products in Community herbal monographs (EMA/HMPC/473587/2011)
- 447 Template for Assessment report for the development of European Union herbal monographs and  
448 European Union list entries (EMA/HMPC/418902/2005 Rev. 5)
- 449 Guideline on risk assessment of medicinal products on human reproduction and lactation: from data to  
450 labelling (EMA/CHMP/203927/2005)