

**Importance of HMPC Community  
Monographs and Community List Entries  
for the Marketing Authorisation and  
Registration of Herbal Medicinal Products  
in Europe: Phytotherapeutical  
Association's Perspective on  
Implementation**

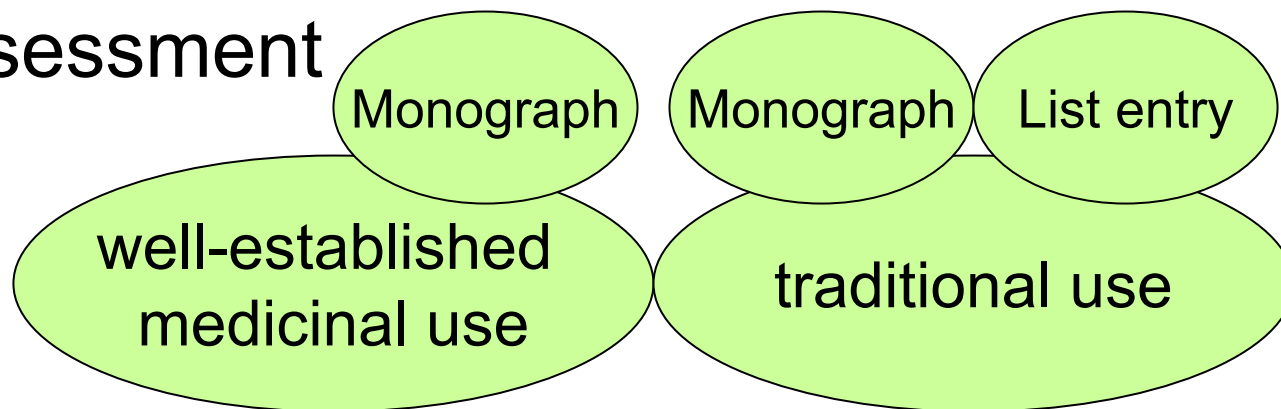
**GA Workshop Graz, 2 September 2007  
Dr. Barbara Steinhoff, BAH**

# General considerations

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## Community Herbal Monographs and List Entries ...

- ... are helpful for individual applications
- ... facilitate mutual recognition
- ... contribute to harmonisation of scientific assessment



# Scope of the monographs

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## **"Qualitative and quantitative composition"**

- All products in the market covered?
- Esp. for the so-called "other herbal preparations": drug extract ratio, extraction solvent, if possible pharmacopoeia
- "Note for Guidance on the declaration"
- Important for an unambiguous interpretation of the dosage recommendations

# Therapeutic indications

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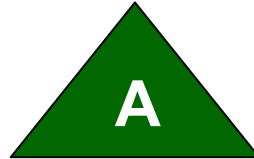
## Maintain the principle of CD 2001/83/EC

- Double-tracked system of well-established medicinal use and traditional use
- In principle both options for each preparation: marketing authorisation or registration
- Depending on individual data for the herbal preparation: well-established medicinal use or traditional use

# "Herbal Hierarchy"

Marketing authorization

New substance/ new  
indication  
Major claims

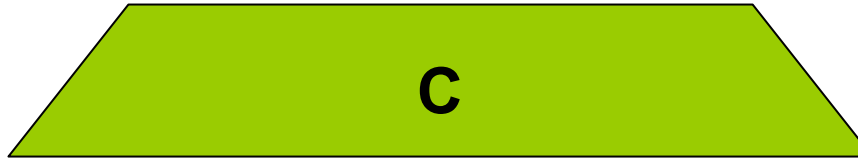


Medium  
claims



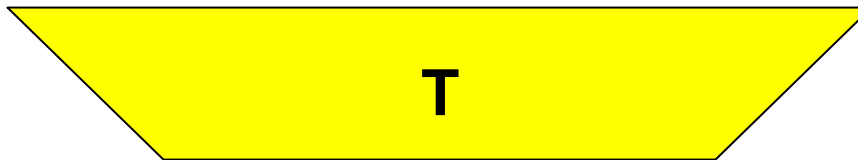
"for treatment,  
prevention of..."

Minor  
claims



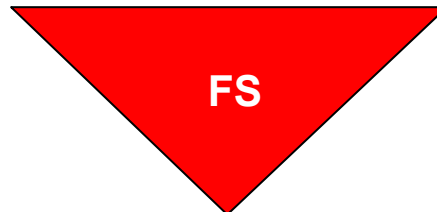
Registration

Traditional hmp



"traditionally  
used"

Food supplement



"physiological  
effect"

# Therapeutic indications

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## Justification of "well-established use"

- "At least one controlled clinical study" (incl. e.g. post-marketing study) "of good quality"
- If clinical experience is well-documented and conclusive (human) pharmacological data available: case-by-case assessment
- HMPC Guideline on the Assessment of Clinical Safety and Efficacy (adopted September 2006)

# Therapeutic indications

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- Preferably "well-established medicinal use" as far as justified by clinical experience and pharmacological data
- e.g. Thymi herba, Melissaefolium, Foeniculi fructus, Passiflorae herba
- Comments submitted by interested parties (e.g. AESGP, ESCOP, Kooperation Phytopharmaka)

# Therapeutic indications

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## Appropriate indications for traditional use

- In case well-established use is not accepted, appropriate indications for traditional use should be found
- Level of indications?
- Example UK: "Symptoms of the menopause, such as hot flushes, night sweats, and temporary changes in mood (such as nervous irritability and restlessness)"

# Therapeutic indications

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- Example UK: "Prevention of migraine headaches" (previously diagnosed by a doctor)
- Example Germany: "Support of the cardiac/circulatory function"
- Example Germany: "Support of the kidney function"
- "Level" of indications not harmonised
- Differences will remain?

# Therapeutic indications

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## Borderline to food supplements

- Appropriate indications needed for the traditional use
- Current activities of the European food industry
- Proposed claims for food supplements
- Based e.g. on ESCOP monographs (!)
- Evaluation by EFSA

# Claims for food supplements

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## Proposals of the European food industry

- *Cascara sagrada*: "Improves intestinal motility"
- *Cucurbita pepo*: "Contributes to the normal function of bladder and prostate"
- *Echinacea purpurea*: "Supports the natural defences of the body / supportive during common cold and infections"

# Claims for food supplements

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## Proposals of the European food industry

- Ginkgo biloba: "Maintenance and preservation of normal cognitive performance from the age of 50"
- Hypericum perforatum: "Contribution to emotional balance and general wellbeing"; "Helps to get over depressions"

# Dosage recommendations

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## General issue

- Should take into account information given in chapter 2 (composition)
- E.g., HMPC draft monograph Thymi herba: dosage recommendation should be in line with the clinical studies performed with thyme herb liquid extract DAB and the German Commission E monograph

# Dosage recommendations

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## Children's dosage

- Should take into account the long-term use of preparations in different age groups and the experiences of paediatric physicians
- E.g., HMPC monograph *Foeniculi fructus*
- Use in children from 0-12 years can be documented
- Market importance of herbal tea and preparations such as fennel honey

# Preclinical safety data

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## Genotoxicity issue

- Note for Guidance on the non-clinical documentation for herbal medicinal products published
- Genotoxicity data should only be requested in case of a specific safety concern
- Supplementary guideline on the interpretation of results appreciated

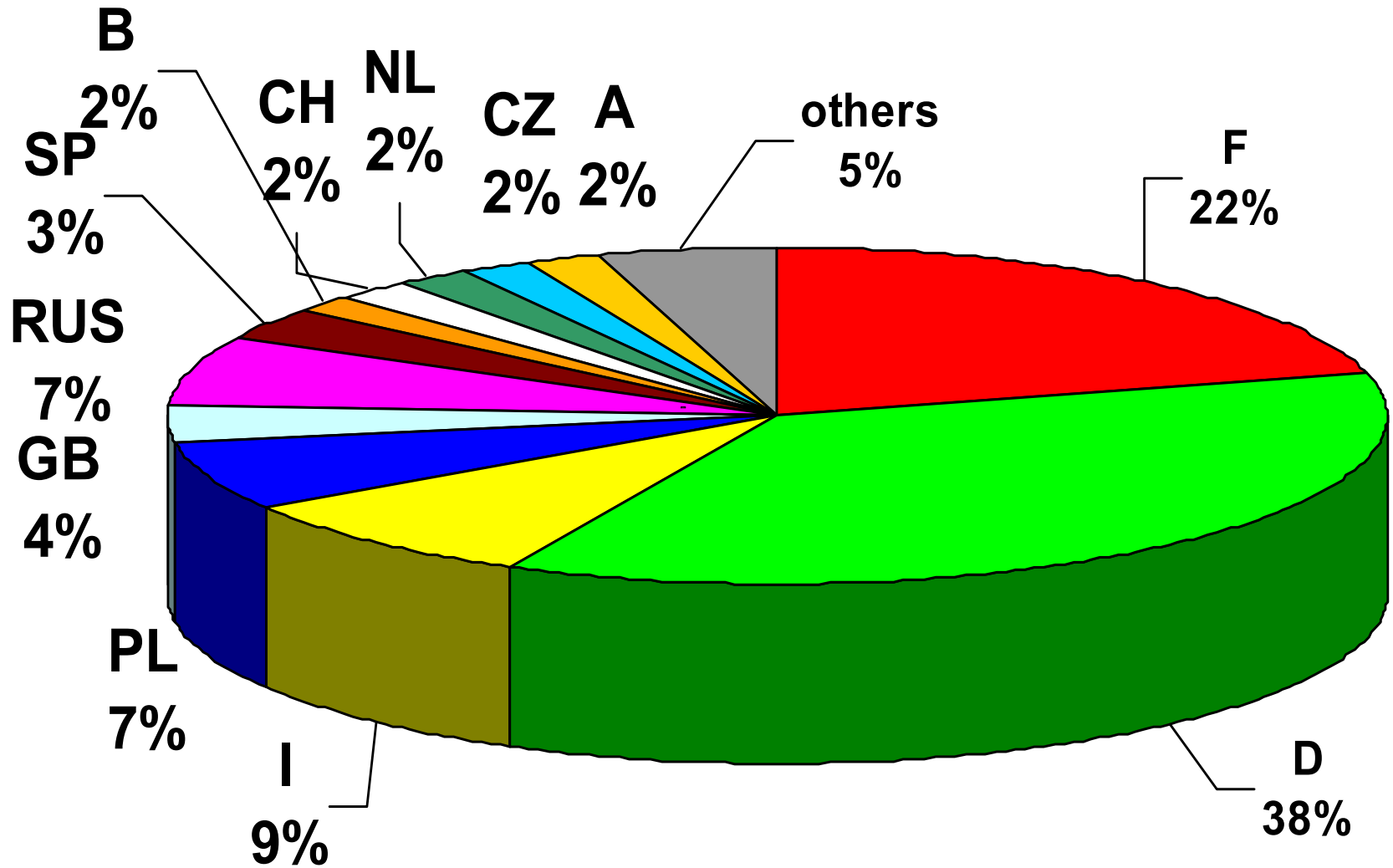
# Preclinical safety data

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## Genotoxicity issue

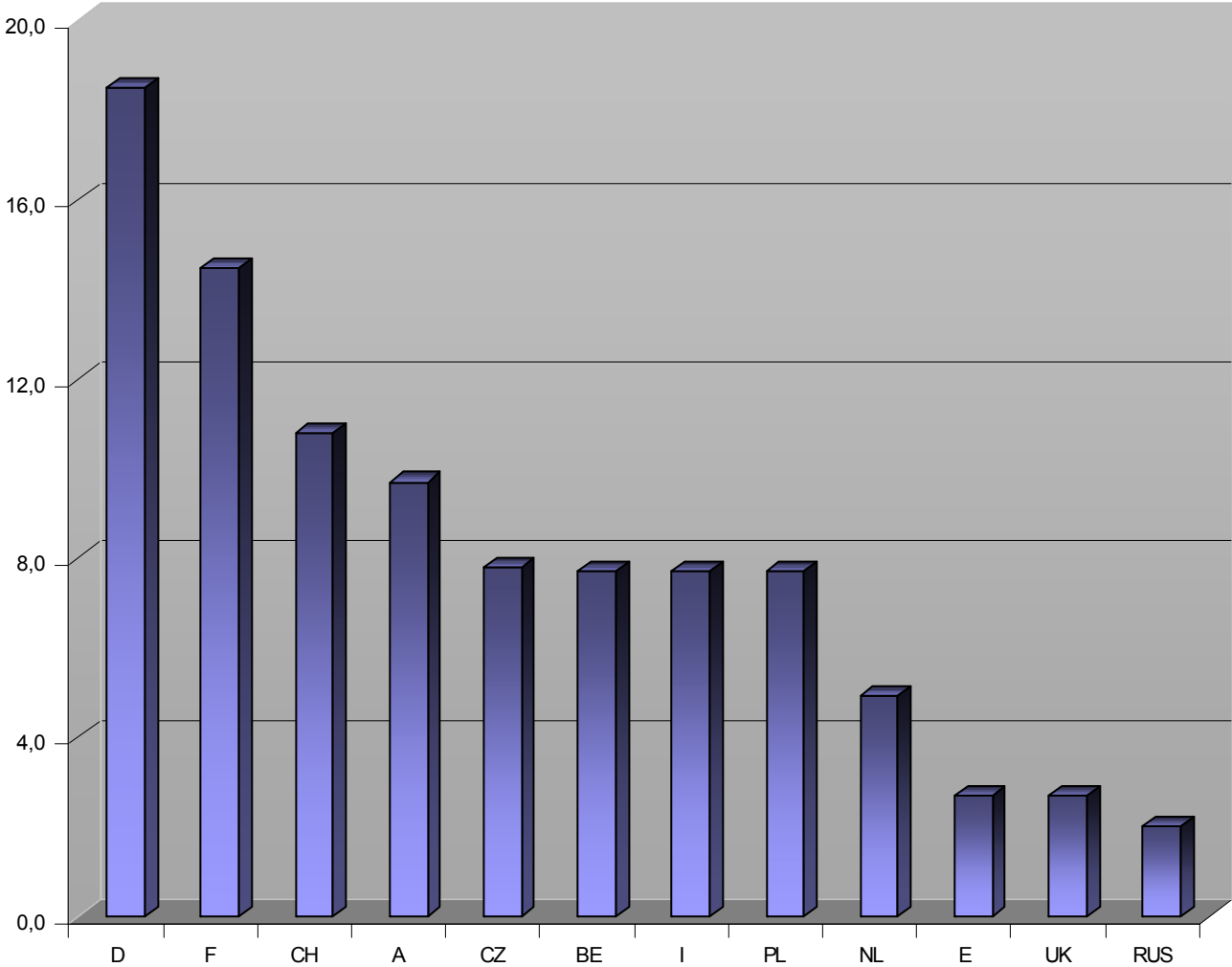
- Restrict the need for genotoxicity testing of herbal preparations to cases where there is really a cause for concern
- No higher requirements as compared to known substances of chemical origin
- No further work on list entries on e.g. *Valerianae radix* and *Lini semen*

# The European HMP Market 2005: Turnover (rounded)



Source: IMS International

# HMP turnover in Euro per capita and year in Europe (2005)



Source: IMS/BAH calculation

# Perspectives

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## Monographs and list entries

- Important tools for facilitation of marketing authorisation/registration and mutual recognition
- Well-established or traditional use depending on individual data
- Achieving harmonised assessment criteria
- Harmonisation must not mean: minimum indications and maximum risk information

**Thank you !**