Chinese Medicines Products and the European Union Regulatory Framework – an Update

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Disclaimer

With reference to the publication policy of the European Medicines Agency (EMA) I do not speak on behalf of the Committee on Herbal Medicinal Products (HMPC) or the EMA.

The views expressed here may not be understood or quoted as being made on behalf of the HMPC/EMA or reflecting the position of the HMPC/EMA.

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2. Legislation on Traditional and Herbal Medicinal Products in the European Union
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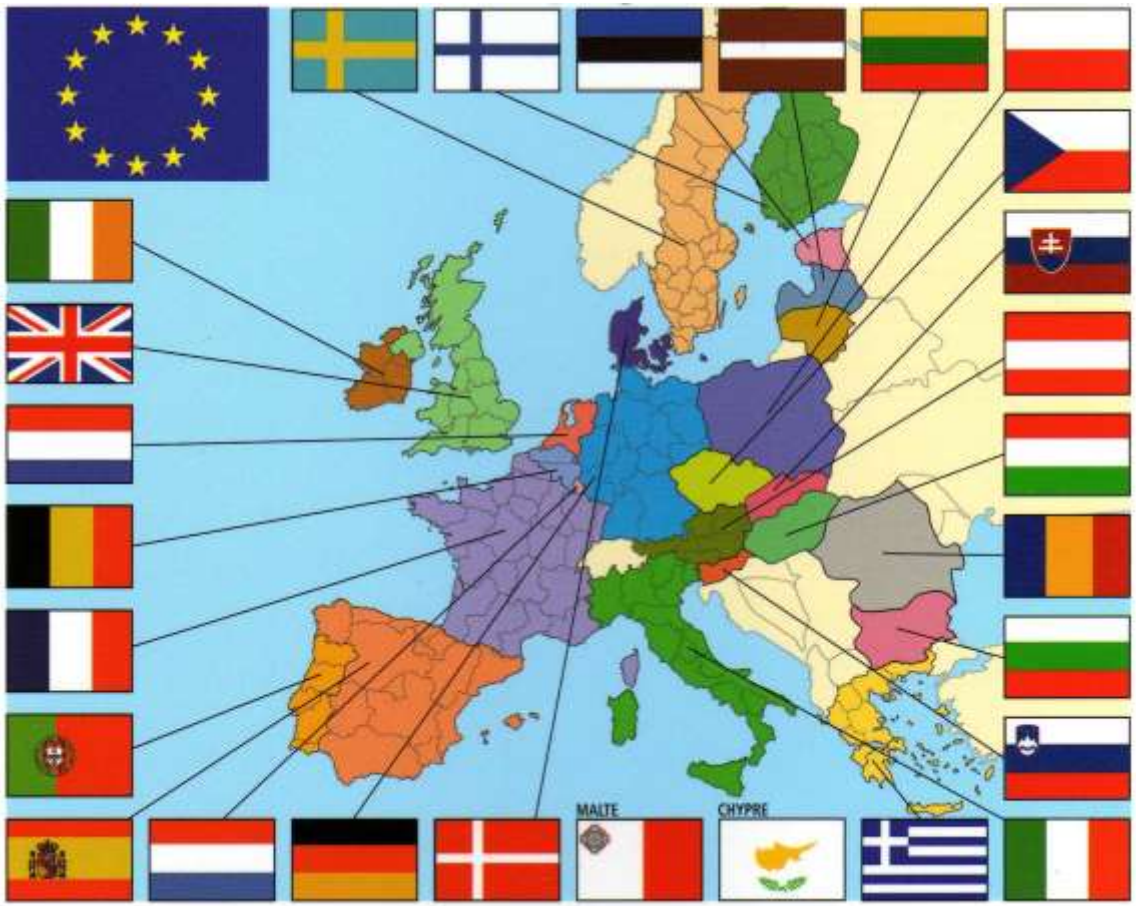
Traditional medicines all over the world

European Union



Political union of 28 Member States

about 500 Mio inhabitants

24 official languages

Pharmaceutical Legislation in the EU

- CD 2001/83 ("Basic" regulation on medicinal products)
  amended by

- CD 2003/63 (Annex I, CTD criteria)
- CD 2004/24 (Traditional herbal medicinal products)

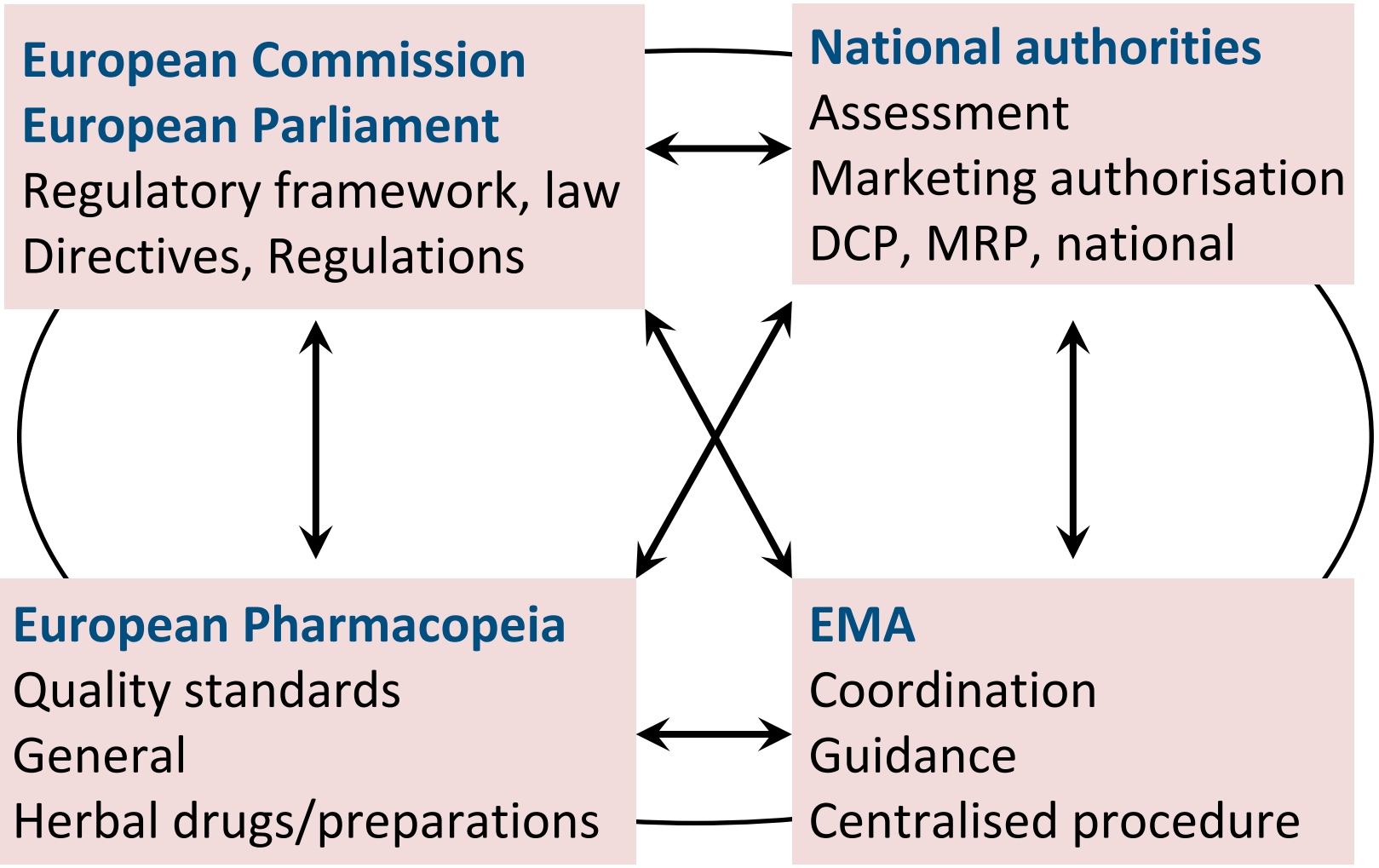
Pharmaceutical Legislation in the EU
Definitions

Medicinal product

Herbal medicinal product
Traditional herbal medicinal product
(longstanding tradition, plausibility)

Herbal substance (Eur. Ph. “Herbal drug”)
Herbal preparation (Eur. Ph. “Herbal drug preparation”)

Key Institutions



Tasks

EMA

HMPC monographs
Safety + Efficacy

Standards

European Pharmacopeia

Eur. Ph. monographs
Quality

National authorities or EMA (centralised)

Product applications
Assessment
Licensing

Federal Institute for Drugs and Medical Devices

Access to the Market – Options and Concepts

- **Marketing authorisation**

  full application (e. g. new medicinal products)

  well-established use

- **Registration**

  traditional use

Specific Concepts – Well-established use

- More than 10 years accepted medicinal use in the EU based on a marketing authorization
- Quantitative substantiation of use of the substance
- Degree of scientific interest in the use of the substance
- Coherence of bibliographic scientific data, scientific assessments and published scientific literature
- HMPC monographs: at least one controlled clinical trial of good quality

Specific Concepts – Traditional Use

Registration of traditional herbal medicinal products
applicable to ***traditional*** herbal medicinal products

Article 16c 1 (c)

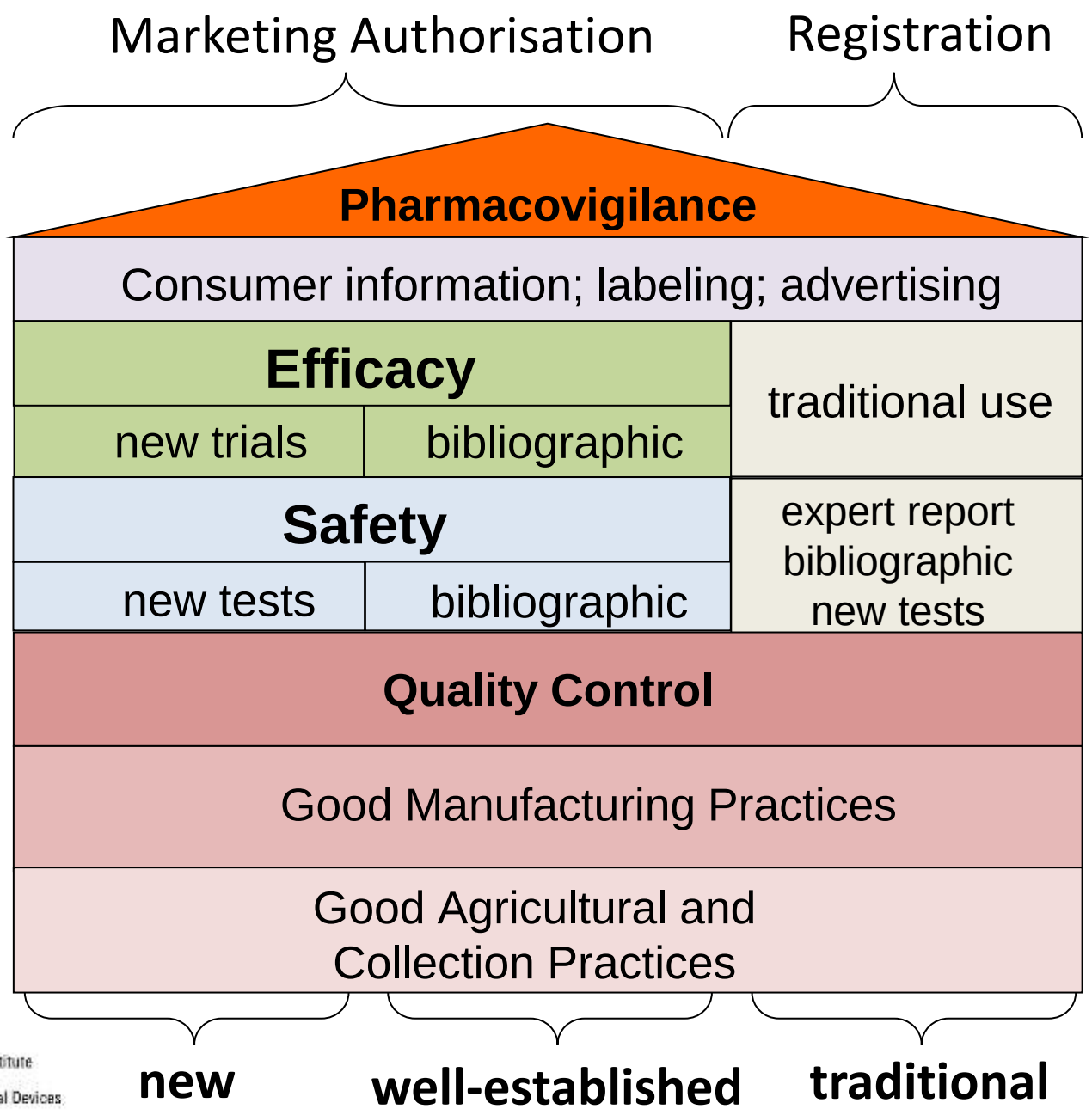
> 30 years of medicinal use within the EU or

> 15 years in and > 15 years outside the EU

Deviations may be decided by the
Herbal Medicinal Products Committee (HMPC, EMA)
if requested by a Member State

Specific Concepts – Traditional Use

- **Indication(s) appropriate – minor diseases**
- **Without the supervision of a medical practitioner for diagnosis, prescription or monitoring of treatment**
- Only **oral**, **external** and **inhalation**
- **Sufficient data on traditional use**
- **Pharmacological effects / efficacy plausible on the basis of long-standing use and experience**


Marketing Authorisation
Registration
Pharmacovigilance
Consumer information; labeling; advertising
Efficacy
new trials
bibliographic
traditional use
Safety
new tests
bibliographic
expert report
bibliographic
new tests
Quality Control
Good Manufacturing Practices
Good Agricultural and
Collection Practices
new
well-established
traditional

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HMPC and Development of European Union Monographs

HMPC and guests at the presidency meeting 2015

European Medicines Agency - EMA

- Central European Authority

  with specified tasks
- Committees and Working Parties
- Coordination of

  National Competent Authorities
- Documents (www.ema.europa.eu)

Committees at EMA

CHMP Committee on Medicinal Products for Human Use

COMP Committee on Orphan Medicinal Products

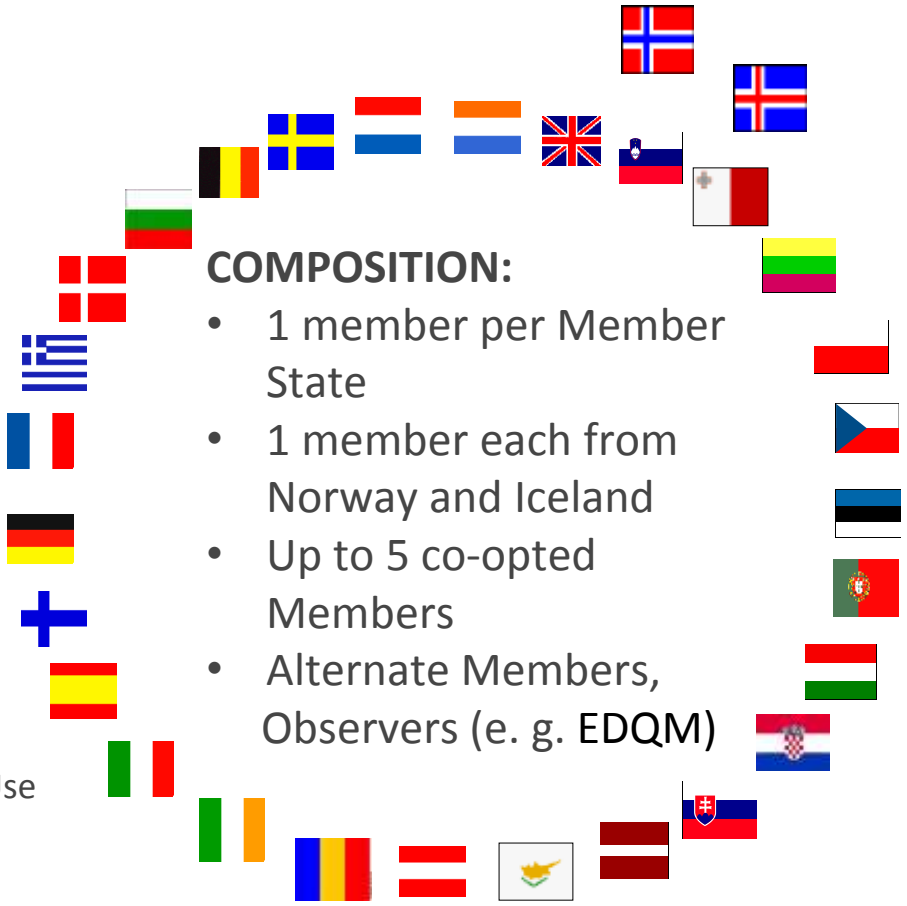
PDCO Paediatric Committee

HMPC **Committee on Herbal Medicinal Products**

CAT Committee on Advanced Therapies

CVMP Committee on Medicinal Products for Veterinary Use

PRAC Pharmacovigilance Rsik Assessment Committee



COMPOSITION:

- 1 member per Member State
- 1 member each from Norway and Iceland
- Up to 5 co-opted Members
- Alternate Members, Observers (e. g. EDQM)

EU Legal Framework and Different Traditions

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

of 31 March 2004

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

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

eaty establishing the
r Article 95 thereof,

al from the Commission ( ),

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

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

(4) Having
characteristics of these
medicina
eir long tradition, it is
desirable
simplified registration
procedu
al medicinal products.
However
edure should be used

and an acceptable level of safety and are not eligible for
marketing authorisation. To maintain these products
the market, the Member States have enacted differing
ocedures and provisi
rrently exist between t
Member States may
dicinal products within
crimination and distort
nufacturers of these pr
impact on the protecti
necessary guarantees of q
not always provided at present.

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have
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are

HMPC – Elaboration of Harmonised Standards

European Union Monographs on
safety and efficacy
Guidance documents

Federal Institute
for Drugs
and Medical Devices

Documents developed by the HMPC

- **HMPC-Monographs** on efficacy and safety –
  recommendation to Member States
- **List Entries** – published by EC,
  binding to Member States
- **Public Statements** – specific information (e. g. no release of a monograph, safety of specific constituents)
- **Revisions** – every 5 years, sustainability of the system
- **Guidelines** – recommendations to national competent authorities and applicants, consensus on harmonized assessment
- **Reflection Paper**, **Questions & Answers** – regulatory perspectives on selected topics

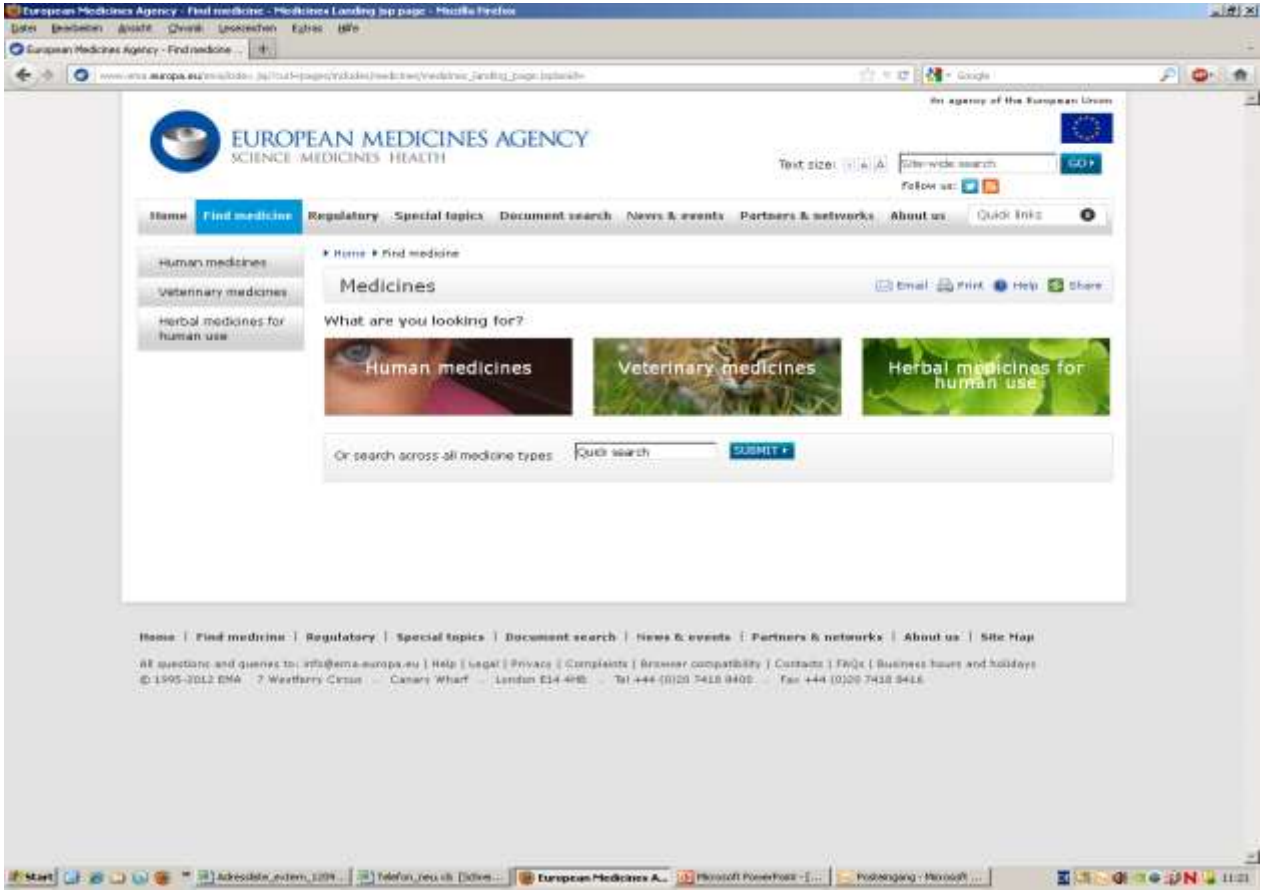
HMPC - Achievements

Monographs	140
List Entries	13
Revisions	16
Public Statements	13

Guidance about 30

www.ema.europa.eu

Standards made public



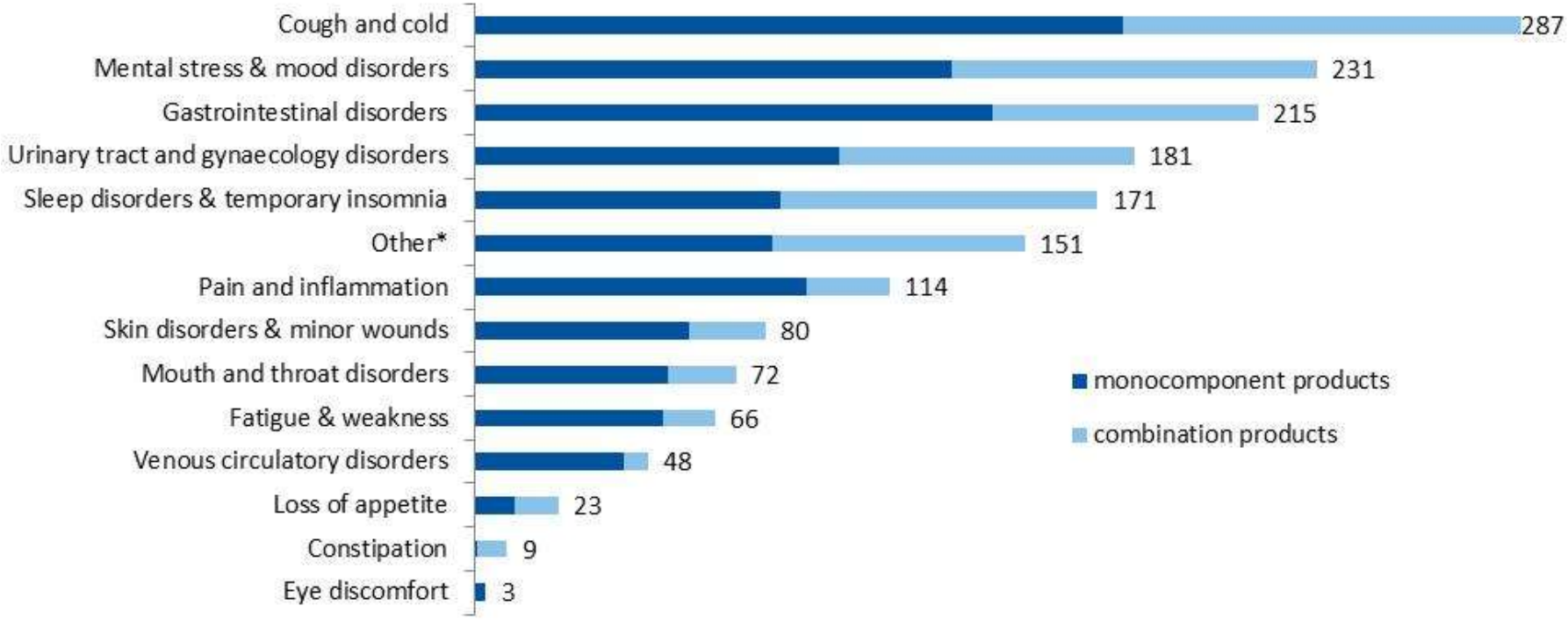
Agendas
Meeting reports
Minutes

Monographs
Assessment reports
References
Comments

Guidelines

www.ema.europa.eu

Therapeutic Areas of Traditional Herbal Medicinal Products (reference: www.ema.europa.eu)



Monographs – Request for Data

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

14 February 2014
EMA/HMPC/87628/2014
Committee on Herbal Medicinal Products (HMPC)

Call for scientific data for use in HMPC assessment work on Paeoniae radix

Submission period: 15 February 2014 - 15 May 2014

The HMPC invites all interested parties such as pharmaceutical industry associations, health care professional groups, learned societies, consumers and patients' associations, governmental institutions as well as EU and EEA-EFTA Member States to submit any scientific data, which may be used in the assessment of Paeoniae radix as part of the establishment of Community herbal monographs and/or Community list entries.

Scientific contributions should be sent to:

By post	By email
European Medicines Agency 7 Westferry Circus Canary Wharf UK-London E14 4HB Att.: HMPC secretariat either one CD-rom or paper prints (2 copies)	hmpc.secretariat@ema.europa.eu

If an interested party intends to send scientific contributions in response to several calls for scientific data, response should be sent separately to each call.

A list of all scientific contributions and their references should be enclosed.

The name and contact details of the interested party providing the scientific contributions is required.

Unpublished data may be included. However, the consent of the data owner is a necessary requirement. The owner of the data will be given the opportunity to review the assessment report to remove any confidential data. The HMPC will consider such submissions on a case-by-case basis. Submitting parties are bound to obey existing copyrights. Contributors should also take duly into account the rights of interested parties, as the documentation provided will be used for the development of Community list entries and Community herbal monographs. Such development is

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

28 January 2014
EMA/HMPC/321097/2012
Committee on Herbal Medicinal Products (HMPC)

Community herbal monograph on *Ginkgo biloba* L., folium

Draft

Discussion in Working Party on Community monographs and Community list (MLWP)	May, Sep, Nov 2012 Jan, Mar, May, Jul, Sep, Nov 2013
Adoption by Committee on Herbal Medicinal Products (HMPC) for release for consultation	28 January 2014
End of consultation (deadline for comments). Comments should be provided using this template to hmpc.secretariat@ema.europa.eu	15 June 2014
Rediscussion in Working Party on Community monographs and Community list (MLWP)	
Adoption by Committee on Herbal Medicinal Products (HMPC)	

Keywords	Herbal medicinal products; HMPC; Community herbal monographs; well-established medicinal use; traditional use; *Ginkgo biloba* L., folium; Ginkgo folium; Ginkgo leaf

Monographs – Options for Input of Data

- Call for data before start of the work
- Public consultation after finalisation of a draft monograph
- Support by interested parties
- Scientifically based and justified input with supporting documentation is welcome

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Traditional medicine from non-European countries in Europe

- May be available in pharmacies
- May be available in herbalist shops
- May be applied in specialized hospitals

- May be offered via internet
- May be sold with different classification

→ **Need for harmonisation**

HMPC Work Program 2012 - 2015

High

– Regulatory guidance for non-European interested parties – 2012

Initiate pilot projects for herbal substances with a non-European traditional background. **Identify central questions or obstacles** and provide specific information in conjunction with a training for assessors.

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

7 September 2011
EMA/HMPC/501139/2011
Committee on Herbal Medicinal Products (HMPC)

HMPC work programme for 2012-2015
Draft

Besides the management of HMPC's core-tasks as defined in Directive 2004/24/EC which are reflected in the annual work programmes of the HMPC working party (monographs) and drafting groups (quality, organisational matters), a number of the activities presented in this HMPC work programme 2012-2015 represent actions which support the objectives outlined in the 'EMA Road Map to 2015' and the associated implementation plan 'From Vision to Reality', some of which stem from the 'Action plan for herbal medicines 2010-2011'.
The HMPC work programme elaborates on objectives and deliverables identified in the context of the **harmonisation of procedures and provisions laid down in EU Member States** concerning herbal medicinal products, whilst some focus on those aspects specifically relating to the **work of the HMPC**.

'Road map to 2015: The European Medicines Agency's contribution to science, medicines and health' (EMA/299895/2009)
'From Vision to Reality: Implementing the European Medicines Agency's Road map to 2015: The Agency's contribution to science, medicines, health' dated 18 May 2011 (EMA/743205/2010)
'Action plan for herbal medicines 2010-2011' (EMA/831327/2009)

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High

– Harmonisation of assessment practice for herbal substances of non-European origin – 2012-2015

Federal Institute for Drugs and Medical Devices

HMPC – Activities towards non-European traditional medicines

2014 Question & Answers (… non-European …)

2013 Pilot Project on Monographs for herbal substances from traditional medicines of non-European Origin

2012 HMPC Assessors Training on non-European Traditional Medicines

2011 HMPC delegation in Bejing (seminar, meetings with authorities)

Questions & Answers Document

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

25 March 2014
EMA/HMPC/402684/2013
Committee on Herbal Medicinal Products (HMPC)

Questions & Answers on the EU framework for (traditional) herbal medicinal products, including those from a 'non-European' tradition

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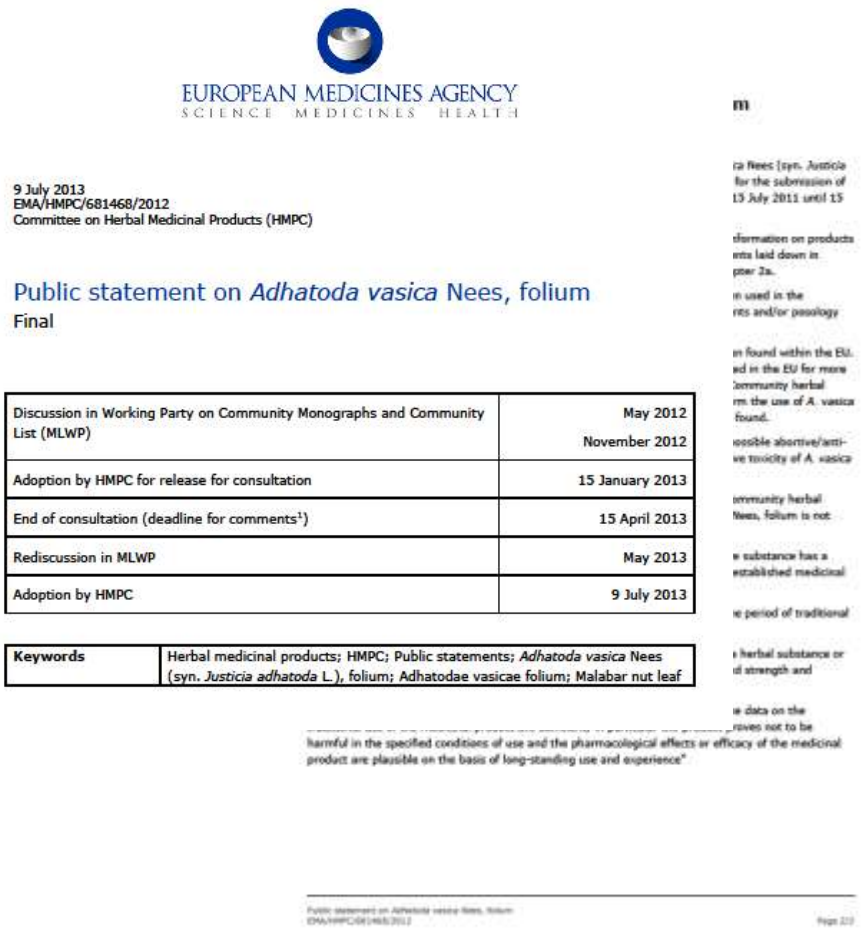
Experiences



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

9 July 2013
EMA/HMPC/681468/2012
Committee on Herbal Medicinal Products (HMPC)

Public statement on *Adhatoda vasica* Nees, folium
Final

Discussion in Working Party on Community Monographs and Community List (MLWP)	May 2012 November 2012
Adoption by HMPC for release for consultation	15 January 2013
End of consultation (deadline for comments[1])	15 April 2013
Rediscussion in MLWP	May 2013
Adoption by HMPC	9 July 2013

Keywords	Herbal medicinal products; HMPC; Public statements; *Adhatoda vasica* Nees (syn. *Justicia adhatoda* L.), folium; Adhatodae vasicae folium; Malabar nut leaf

harmful in the specified conditions of use and the pharmacological effects or efficacy of the medicinal product are plausible on the basis of long-standing use and experience"

- No sufficient data to support well-established use
- No sufficient data to support tradition of 15 + 15 years
- No sufficient data on posology
- No sufficient data on safety and plausibility

✓ Future task: search for strategies and solutions

From non-European countries to Europe

- Access to the European market for finished medicinal products
  - according to European legislation
  - fulfilling requirements
  - traditional, (well-established use), new product

- Procedures for finished medicinal products
  - national procedure
  - decentralised/ mutual recognition procedure
  - centralised procedure

Examples of Two Successful Applications for Traditional Herbal Medicinal Products

- Professional strategies include
  - Early scientific advice (national or European level)
  - Ressources
  - Sound data and adequate documentation

- Successful applications
  - Traditional herbal
    - medicinal products

Conclusions

1. HMPC has developed harmonised European standards for the Member States of the European Union.

2. The European legal framework offers options for (traditional) herbal medicinal products from non-European countries.
3. HMPC has followed different approaches to strive for harmonised assessment of (traditional) herbal medicinal products from non-European countries.

4. Scientific advise is offered and professional applications are welcome.
5. Communication amongst regulators at global level is developing.

Thank you very much for your attention!

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