IPAR

Public Assessment Report for a
Traditional Herbal Medicinal Product
for Human Use

TR Holder

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I. INTRODUCTION

Specific provisions were introduced for traditional herbal medicinal products (THMPs) in accordance with the Traditional Herbal Medicinal Products Directive (2004/24/EC). The national regulations, the Medicinal Products (Control of Placing on the Market) Regulations 2007 (S.I. No. 540 of 2007) which implement this Directive came into force on 23rd July 2007. Consequently the HPRA has established the Traditional Herbal Medicinal Products Registration Scheme.

The Public Assessment Report reflects the scientific conclusion reached by the Health Products Regulatory Authority (HPRA) at the end of the evaluation process and provides a summary of the grounds for approval of a Certificate of Traditional Use Registration for a specific traditional herbal medicinal product for human use. It is made available by the HPRA for information to the public, after deletion of commercially sensitive information. The legal basis for its creation and availability is contained in Article 21 of EC Directive 2001/83/EC, as amended by Directive 2004/27/EC and Directive 2004/24/EC. It is a concise document which highlights the main parts of the documentation submitted by the applicant and the scientific evaluation carried out by the HPRA leading to the approval of the traditional herbal medicinal product for marketing in Ireland.

Based on the review of the data on quality, safety and traditional use, the HPRA has granted Holland & Barrett International Limited a Certificate of Traditional Use Registration for **Nature's Bounty Devil's Claw Hard Capsules** containing a Dry Extract of Devil's Claw Root (*Harpagophytum procumbens* D.C. and/or *H. zeyheri* L. Decne, radix).

This application was submitted as a standard application according to Article 16a1 of Directive 2001/83/EC, as amended, as part of the Traditional Herbal Medicinal Product Registration Scheme.

The Summary of Product Characteristics (SmPC) for this traditional herbal medicinal product is available on the HPRA's website.

II. QUALITY ASPECTS

This application is for Nature's Bounty Devil's Claw Hard Capsules. The active ingredient of Nature's Bounty Devil's Claw Hard Capsules is a dry extract obtained from the dried root of Devils Claw.
Each hard capsule contains 427 mg of extract (as dry extract) from Devil's Claw root (*Harpagophytum procumbens* D.C. and/or *H. zeyheri* L. Decne, radix) (equivalent to 1493 mg – 2133 mg of Devil's Claw root).
Extraction solvent: Ethanol 60% v/v.

II.1 S.1 Herbal Substance

The herbal substance is Devil's Claw root. The herbal substance specification is considered adequate to control the quality and meets current pharmacopoeial requirements. Batch analytical data demonstrating compliance with this specification has been provided.

II.2 S.2 Herbal preparation

The herbal preparation is a dry extract from Devil's Claw root (*Harpagophytum procumbens* D.C. and/or *H. zeyheri* L. Decne, radix) and is manufactured in accordance with the principles of good manufacturing practice (GMP).

The herbal preparation specification is considered adequate to control the quality and meets current pharmacopoeial requirements. Batch analytical data demonstrating compliance with this specification has been provided.

II.3 Medicinal product

P.1 Composition

Nature's Bounty Devil's Claw Hard Capsules are two-piece, clear hard capsules with a grey/brown fill. Each capsule contains 427 mg of extract (as dry extract) from Devil's Claw root.

The capsules also contain the following excipients; maltodextrin and silica colloidal anhydrous (that are part of the herbal preparation), calcium hydrogen phosphate dihydrate, microcrystalline cellulose, magnesium stearate, silica colloidal hydrated and hypromellose.

P.2 Pharmaceutical Development

The product is an established pharmaceutical form and its development is adequately described.

P.3 Manufacture of the Product

The product is manufactured in accordance with the principles of good manufacturing practice (GMP) at suitably qualified manufacturing sites.

The manufacturing process is standard. The manufacturer has extensive experience and has committed to carry out full process validation on commercial batches.

P.4 Control of Other Substances (Excipients/*Ancillary Substances)*

All ingredients comply with Ph. Eur. or are adequately controlled by the manufacturer's specifications.

P.5 Control of Finished Product

The Finished Product Specification is satisfactory and the tests and control limits are considered appropriate for this type of product.

The analytical methods used are described in sufficient detail and are supported by validation data.

Batch analytical data have been provided and demonstrate the ability of the manufacturer to produce batches of finished product of consistent quality.

P.6 Packaging material

The product is presented as green polyethylene terephthalate (PET) bottles with a polypropylene cap and an inner seal liner made up of polyester, polymer adhesive layer, polyolefin foam and aluminium foil containing either 50 or 100 capsules.

Evidence has been provided that the packaging components comply with the relevant EU legislation requirements for use with foodstuffs.

P.7 Stability of the Finished Product

Stability data on the finished product in the proposed packaging have been provided in accordance with EU guidelines demonstrating the stability of the product for 3 years when stored below 25ºC and with the bottle kept tightly closed.

II.4 Conclusion on quality

The important quality characteristics of the product are well-defined and controlled. Satisfactory pharmaceutical documentation has been provided, assuring consistent quality of Nature's Bounty Devil's Claw Hard Capsules.

III. NON-CLINICAL ASPECTS

Nature's Bounty Devil's Claw hard Capsule is a traditional herbal medicinal product as defined by Article 16a(1) of Directive 2001/83/EC as amended.

No new preclinical studies have been submitted.

Given the type of application and limited data available, it is not possible to assess if the safety package for the phytochemical constituents of Nature's Bounty Devil's Claw hard Capsule are acceptable to the standards of today's GLP and safety testing requirements.

While no new preclinical studies have been submitted, an expert report on safety has been provided which includes an appropriate review of the available literature. No safety concern was identified. However, Genotoxicity (ames test) has been

submitted. Overall, the information presented demonstrating traditional use is acceptable and thus the lack of provision of a complete standard safety package is acceptable and in line with the EMA "Guideline on Non-clinical Documentation for Herbal Medicinal Products in Applications for Marketing Authorisation (bibliographical and mixed applications) and in Applications for Simplified
Registration" (EMEA/HMPC/32116/05).

An environmental risk assessment is not required for herbal medicinal products according to guidance CPMP/SWP/4447/00.

IV. CLINICAL ASPECTS

This is a national application submitted by Holland & Barrett International Limited under Article 16a1 of Directive 2001/83/EC, as amended.

Nature's Bounty Devil's Claw Hard Capsules is a traditional herbal medicinal product used for the relief of minor joint pain in adults, exclusively based upon long-standing use.

IV.1 Clinical Efficacy

There is no requirement under the Traditional Herbal Registration Scheme to prove scientifically that the product is efficacious, the registration is based exclusively upon the longstanding use of Nature's Bounty Devil's Claw Hard Capsules as a traditional herbal medicine and not upon data generated from clinical trials.

Article 16c1(c) of Directive 2001/83/EC requires the applicant to provide bibliographic or expert evidence to show that the medicinal product in question, or a corresponding product, has been in medicinal use throughout a period of at least 30 years, including at least 15 years within the Community. With regard to this traditional use data, the requirements of Article 16c1(c) have been met.

The efficacy of this traditional herbal medicinal product is plausible on the basis of long standing use and experience.

The indication proposed for Nature's Bounty Devil's Claw Hard Capsules is in line with traditional indications recorded and hence, compatible with the requirements of the Traditional Herbal Medicinal Products Directive 2004/24/EC.

IV.2 Clinical Safety

In accordance with Article 16c1(d) the applicant has provided a bibliographic review of the safety data together with an expert report.

This product should not be used in those under 18 years of age as it is not known if it is safe to do so.

Patients who are allergic to Devil's claw or any of the other ingredients of this product should not use Nature's Bounty Devil's Claw Hard Capsules.

Patients with gastric or duodenal ulcers should not use Devil's claw preparations.

The recommended dose of this product should not be exceeded.

It is recommended that if symptoms persist, worsen or do not improve after 4 weeks of use of this product, a doctor or pharmacist should be consulted.

Patients who have painful, swollen or red joints or a fever should consult a doctor or pharmacist before using this product.

Patients with gallstones should consult a doctor prior to use of Devil's claw.

Patients who have heart problems should talk to their doctor or pharmacist before taking this product.

Women who are pregnant, breast-feeding or planning to have a baby should not take this product.

Possible side effects of this product include nausea, abdominal pain, diarrhoea, vomiting, headache, dizziness, allergic skin reactions, itch and rash.

Some patients may experience dizziness or drowsiness while taking this product. Those who are affected in this way should not drive or use machines.

In conclusion, this product proves not to be harmful in the specified conditions of use based on the review of safety data, expert report and additional data provided.

IV.3 Pharmacovigilance

It should be noted that in accordance with Article 16g of Directive 2001/83/EC, as amended, the pharmacovigilance requirements described in Articles 101- 108 of Directive 2001/83/EC, as amended, also apply in respect of traditional herbal medicinal products.

V. OVERALL CONCLUSIONS

The important quality characteristics of the product are well-defined and controlled. Satisfactory pharmaceutical documentation has been provided, assuring consistent quality of Nature's Bounty Devil's Claw Hard Capsules.

The HPRA, on the basis of the data submitted, considered that Nature's Bounty Devil's Claw Hard Capsules demonstrated adequate evidence of traditional use for the approved indication and no new preclinical or clinical safety concerns have been identified.

A certificate of traditional use registration for Nature's Bounty Devil's Claw Hard Capsules is granted.

VI. REVISION DATE

February 2021

VII. UPDATES

This section reflects the significant changes following finalisation of the initial procedure.

Procedure number	Product Information affected	Date of start of procedure	Date of end of procedure	Approval/non approval
CRN 2163289 National Variation IB unforeseen C.I.z	SPC section 5.3	23/06/2015	31/08/2015	Approved
CRN00C3JK TR Transfer	SPC section 7, 8 Package Leaflet New TR Holder: Holland & Barrett Limited, Cedar Drive, Dublin Airport Logistics Park, Saint Margarets, Co Dublin, K67 E0C5, Ireland New TR number: TR23157/010/001	26/02/2021	26/02/2021	Approved