

IPAR

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

Lamberts Echinacea Cold & Flu Relief Tablets
Echinacea purpurea (purple coneflower) root extract

TR 2029/002/001

TR holder: Lamberts Healthcare Limited

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 Lamberts Healthcare Limited a Certificate of Traditional Use Registration for Lamberts Echinacea Cold & Flu Relief Tablets, containing *Echinacea purpurea* root dry extract.

This application was submitted as a standard application according to Article 16c 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 Lamberts Echinacea Cold & Flu Relief Tablets. The active ingredient of Lamberts Echinacea Cold & Flu Relief Tablets is an extract obtained from the root of the *Echineacea purpurea* (L.) Moench (purple coneflower) plant.

II.1 S.1 Herbal Substance

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 *Echinacea purpurea* (root) dry extract 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

The composition of the medicinal product is stated in sections 2 and 6.1 of the SmPC. A description of the product is included in section 3 of the SmPC.

P.2 Pharmaceutical Development

The product is an established pharmaceutical form and its development is adequately described in accordance with the relevant European guidelines.

P.3 Manufacture of the Product

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

The manufacturing process has been validated according to relevant European/ICH guidelines and the process is considered to be sufficiently validated.

P.4 Control of Other Substances (Excipients)

All ingredients comply with Ph. Eur. specifications.

P.5 Control of Finished Product

The Finished Product Specification is based on the pharmacopoeial monograph for tablets, 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 for a number of batches from the proposed production site have been provided, and demonstrate the ability of the manufacturer to produce batches of finished product of consistent quality.

P.6 Packaging material

The approved packaging for this product is described in section 6.5 of the SmPC.

Evidence has been provided that the immediate container complies with EU legislation for plastic materials intended 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 and support the shelf-life and storage conditions listed in sections 6.3 and 6.4 of the SmPC.

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 Lamberts Echinacea Cold & Flu Relief Tablets.

III NON-CLINICAL ASPECTS

The HPRA has been assured that GLP standards were followed in an appropriate manner in the studies conducted.

An expert report on safety has been provided which includes an appropriate review of the available literature. Overall the information presented demonstrating traditional use is considered to be acceptable and the lack of provision of a complete standard safety package is 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 Lamberts Healthcare Limited under Article 16c of Directive 2001/83/EC, as amended.

Lamberts Echinacea Cold & Flu Relief Tablets is a traditional herbal medicinal product used to relieve common cold and flu-like symptoms, exclusively based on long-standing use. This product is indicated for use in adults and adolescents over 12 years.

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 Lamberts Echinacea Cold & Flu Relief Tablets 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 Lamberts Echinacea Cold & Flu Relief Tablets 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.

Echinacea is intended for oral short-term use only. The recommended dosage should not be exceeded.

If high temperature occurs, if symptoms worsen or persist for more than 10 days, it is recommended that a qualified healthcare professional e.g. a doctor or pharmacist be consulted.

Echinacea should not be used in known cases of allergy to Echinacea, to plants of the Asteraceae (Compositae) family or to any of the excipients.

The use in children below 12 years of age is not recommended because a safe use has not been sufficiently documented.

Echinacea can trigger allergic reactions (E.g. rash, hives, Stevens-Johnson Syndrome, swelling of the skin, difficulty breathing, asthma and anaphylactic shock) in allergy-prone patients.

It is recommended that patients do not take this product if they are taking other medicines which affect their immune system.

There is limited information about the use of Echinacea tablets in pregnant women. In the absence of enough information, the use in pregnancy and breast-feeding is not recommended.

Because of its immune-modulatory activity, Echinacea should not be used in cases of progressive systemic diseases (tuberculosis, sarcoidosis), autoimmune diseases (e.g. collagenoses, multiple sclerosis), immunodeficiencies (e.g. HIV infection, AIDS), immunosuppression (e.g. chemotherapy, history of organ or bone marrow transplant) and diseases of the white blood cell system (e.g. agranulocytosis, leukaemias).

Patients may find that when they take Lamberts Echinacea Cold & Flu Relief Tablets that they feel tingling, irritation or numbness of the mouth. This is due to the presence of alkylamides which are a natural part of the plant extracts in Lamberts Echinacea Cold & Flu Relief Tablets.

An association with some autoimmune diseases (E.g. multiple sclerosis, erythema nodosum, low blood platelet count, Evans Syndrome, Sjögren syndrome with kidney dysfunction) has also been reported.

No studies on the effects on the ability to drive and use machines have been performed with Echinacea.

There have been no cases of overdose reported with Echinacea products.

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 Lamberts Echinacea Cold & Flu Relief Tablets.

The HPRA, on the basis of the data submitted, considered that Lamberts Echinacea Cold & Flu Relief Tablets demonstrated adequate evidence of traditional use for the approved indication(s) and no new preclinical or clinical safety concerns have been identified.

A certificate of traditional use for Lamberts Echinacea Cold & Flu Relief Tablets is granted.