IPAR

Public Assessment Report for a
Medicinal Product for Human Use

Scientific Discussion

Gabapentin PharmConsul 100 mg hard capsules
Gabapentin
PA1445/026/001

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 marketing authorisation for a specific 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 Directive 2001/83/EC, as amended. 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 medicinal product for marketing in Ireland.

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I. INTRODUCTION

Based on the review of the data on quality, safety and efficacy, the HPRA has granted a marketing authorisation for Gabapentin Consul Capsule, hard – 100, 300, 400 milligrams from PharmConsul on 21st October 2022 for the adjunctive therapy in the treatment of partial seizures with and without secondary generalization in adults and children aged 6 years and above, as monotherapy in the treatment of partial seizures with and without secondary generalization in adults and adolescents aged 12 years and above.

Gabapentin is also indicated in the treatment of peripheral neuropathic pain, and for the treatment of peripheral neuropathic pain such as painful diabetic neuropathy and post-herpetic neuralgia in adults.

This application for a marketing authorisation was submitted in accordance with Article 10(1) of Directive 2001/83/EC and is referred to as a 'generic' application.

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

Name of the product	Gabapentin PharmConsul
Name(s) of the active substance(s) (INN)	Gabapentin
Pharmacotherapeutic classification (ATC code)	N03AX12
Pharmaceutical form and strength(s)	Capsule, hard – 100, 300, 400 milligrams
Marketing Authorisation Number(s) in Ireland (PA)	PA1445/026/001-003
Marketing Authorisation Holder	Aurobindo Pharma (Malta) Limited
Case Reference Number:	CRN00C50P

II. QUALITY ASPECTS

II.1. Introduction

This application is for Gabapentin PharmConsul 100mg, 300mg, 400mg Hard Capsules.

II.2 Drug substance

The active substance is Gabapentin, an established active substance described in the European Pharmacopoeia, and is manufactured in accordance with the principles of Good Manufacturing Practice (GMP).

The active 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.3 Medicinal product

P.1 Composition

Composition of the medicinal product (Active Substance: Gabapentin 100mg, 300mg or 400mg*).*

The excipients in the medicinal product are listed in section 6.1 of the SmPC.
A visual 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 good manufacturing practice (GMP) at suitably qualified manufacturing sites.

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

P.4 Control of Other Substances (Excipients)

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 based on the pharmacopoeial monograph for capsules, 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 sites 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 packaging complies with EU legislation for use with foodstuffs requirements.

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 Discussion on Chemical, Pharmaceutical and Biological Aspects

The important quality characteristics of the product are well-defined and controlled. Satisfactory chemical and pharmaceutical documentation has been provided, assuring consistent quality of Gabapentin PharmConsul 100mg, 300mg, 400mg Hard Capsules.

III. NON-CLINICAL ASPECTS

III.1 Introduction

This active substance is a generic formulation of Neurontin 100mg, 300mg, 400 mg hard capsules on the European market. No new preclinical data have been submitted. As such, no pre-clinical assessment has been made on the application. A non-clinical overview based on literature review has been provided and is acceptable for this type of application.

III.2 Pharmacology

Pharmacodynamic properties of gabapentin are well known. As gabapentin is a widely used, well-known active substance, the applicant has not provided additional non-clinical studies and further studies are not required.

III.3 Pharmacokinetics

Pharmacokinetic properties of gabapentin are well known. As gabapentin is a widely used, well-known active substance, the applicant has not provided additional non-clinical studies and further studies are not required.

III.4 Toxicology

Toxicological properties of gabapentin are well known. As gabapentin is a widely used, well-known active substance, the applicant has not provided additional non-clinical studies and further studies are not required.

III.5 Ecotoxicity/environmental risk assessment

A rationale for the absence of ERA studies has been provided. Since Gabapentin PharmConsul 100 mg, 300mg & 400mg hard capsules is a generic product, it will not lead to an increased exposure to the environment.

III.6 Discussion on the non-clinical aspects

A non-clinical overview based on literature review of the pre-clinical pharmacology, pharmacokinetics and toxicology is adequate. There are no objections to approval of Gabapentin PharmConsul 100 mg, 300mg & 400mg hard capsules from a non-clinical point of view.

IV. CLINICAL ASPECTS

IV.1 Introduction

Gabapentin is a well known active substance with established efficacy and tolerability.

The content of the SmPC approved during the national procedure is in accordance with that accepted for the reference product Lyrica marketed by Pfizer.

For this generic application, the applicant has submitted a bioequivalence study in which the pharmacokinetic profile of the test product is compared with the pharmacokinetic profile of the reference product.
Based on the pharmacokinetic parameters of active substance, the reference tablet is bioequivalent with extent to the rate and extent of absorption and fulfil the bioequivalence requirements outlined in the relevant CHMP Note for Guidance.

The content of the SmPC approved during the national procedure is in accordance with that accepted for the reference product Y marketed by MAH.

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

IV.2 Pharmacokinetics

No new information has been provided, which is appropriate for applications of this type.

IV.3 Pharmacodynamics

No new information has been provided, which is appropriate for applications of this type.

IV.4 Clinical Efficacy

No new information has been provided, which is appropriate for applications of this type.

IV.5 Clinical Safety

No new information has been provided, which is appropriate for applications of this type.
Risk Management Plan
The Applicant submitted a risk management plan, in accordance with the requirements of Directive 2001/83/EC as amended, describing the pharmacovigilance activities and interventions designed to identify, characterise, prevent or minimise risks relating to Gabapentin PharmConsul 100mg, 300mg, & 400mg Hard Capsules.
The RMP (version 1.3, date of final sign-off: 13 May 2022) is acceptable. Routine pharmacovigilance and routine risk minimisation measures are considered sufficient.

Summary table of safety concerns as approved in RMP

Important identified risks	Suicidal ideation and behaviour	
	Abuse and Dependence	

Important potentia lrisks	Risk of birth defects
Missinginformation	Long term effects on learning, intelligence, growth, endocrine function,puberty and child bearing potential in children

An updated RMP should be submitted:
· At the request of the national competent authority;
· Whenever the risk management system is modified, especially as the result of new information being received that may lead to a significant change to the benefit/risk profile or as the result of an important (pharmacovigilance or risk minimisation) milestone being reached.

Periodic Safety Update Reports (PSUR)
With regard to PSUR submission, the MAH should take the following into account:

- PSURs shall be submitted in accordance with the requirements set out in the list of Union reference dates (EURD list) provided for under Article 107c (7) of Directive 2001/83/EC and published on the European medicines web-portal. Marketing authorisation holders shall continuously check the European medicines web-portal for the DLP and frequency of submission of the next PSUR.
- For medicinal products authorized under the legal basis of Article 10(1) or Article 10a of Directive 2001/83/EC, no routine PSURs need to be submitted, unless otherwise specified in the EURD list.
- For medicinal products that do not fall within the categories waived of the obligation to submit routine PSURs by the revised pharmacovigilance legislation, the MAH should follow the DLP according to the EURD list.

IV.6 Discussion on the clinical aspects

The bioequivalence of this product with the reference product has been demonstrated. No new safety concerns have been identified.

V. OVERALL CONCLUSIONS

Gabapentin hard capsules is a generic form of Neurontin. Neurontin is a well-known medicinal product with a proven chemical-pharmaceutical quality and an established favourable efficacy and safety profile.

Bioequivalence has been shown to be in compliance with the CHMP guidance documents. The SmPC is consistent with that of the reference product.

The MAH has provided written confirmation that systems and services are in place to ensure compliance with their pharmacovigilance obligations.

The HPRA, on the basis of the data submitted considered that gabapentin demonstrated bioequivalence with the reference product as well as a satisfactory risk/benefit profile and therefore granted a marketing authorisation.

VI. REVISION DATE

December 2022

VII. UPDATES

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

SCOPE	PROCEDURE NUMBER	PRODUCT INFORMATION AFFECTED	DATE OF START OF PROCEDURE	DATE OF END OF PROCEDURE
New National	N/A	SmPC, Sections 1 to 9	21st October 2022	20th October 2027
MA Transfer	CRN00D8TQ	SmPC section 7, 8, 10	N/A	09/12/2022

		New MA Holder: Aurobindo Pharma (Malta) Limited New PA number: PA1445/026/001		