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Patient Health Protection

Hearing with Kooperation Phytopharmaka during MLWP November 2010 meeting

Report

Kooperation Phytopharmaka representatives
Barbara Steinhoff, Olaf Kelber

The Chair of the Working Party on Community Monographs and Community List (MLWP), Dr Chinou, welcomed the representatives from Kooperation Phytopharmaka. Dr Steinhoff expressed her thanks for the opportunity to discuss the issue of genotoxicity testing relating to the establishment of Community list entries for Traditional Herbal Medicinal Products (THMPs) and to present the current status of the collaborative testing initiative for herbal substances undertaken by the German phyto-pharmaceutical industry under the umbrella of Kooperation Phytopharmaka.

Dr Kelber addressed in his presentation the structure and activities of Kooperation Phytopharmaka (founded by the German Society for Phytotherapy and industry associations in 1982), the legal basis for safety testing in particular for THMPs, and the ongoing initiative by industry in generating necessary data on genotoxicity for important herbal substances. In a coordinated approach genotoxicity tests are performed in GLP certified toxicological laboratories according to OECD, ICH and EMA guidelines. Results are primarily used by participants of the initiative for individual applications but can thereafter also be bought by other interested companies. Dr Kelber welcomed in particular the HMPC guidelines EMEA/HMPC/32116/2005 and EMEA/HMPC/107079/2007 specifying the needs for HMPs and guideline EMEA/HMPC/67644/2009 introducing the bracketing and matrixing principle as a reasonable way to establish safety for multiple herbal preparations using benchmark extracts that cover the complete polarity range.

Dr Kelber and Dr Steinhoff concluded that, thanks to the pragmatic approach provided by the HMPC guidance, the knowledge on safety of important herbal substances in Europe has increased in line with current regulatory requirements. The collaborative model may be useful for other questions in the herbal area such as the generation of data on use of THMPs in specific patient groups. It is attractive for companies in view of costs, collaborative and reduced testing as well as enhanced scientific/regulatory acceptance. However, it was noted that data are owned by the sponsors that have invested in the project. So far, companies have not agreed on publication or submission of AMES test results to the HMPC, although the advantage for finalising Community list entries was acknowledged.

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The MLWP Chair thanked the speakers and referred to initiatives taken by the Agency (see also Action Plan for Herbal Medicines 2010-2011 - EMA/831327/2009) including a recent assessors training on non-clinical safety for herbal medicinal products, which had been organised by the Agency with the objective to find harmonised pragmatic solutions to establish safety for THMPs within the given legal framework. Considering that the low number of Community list entries in comparison to monographs is mainly attributed to the lack of genotoxicity data, the HMPC had also sought and received legal clarification from the Agency and the European Commission. Whilst the Committee may use for their assessment work any relevant results of clinical and nonclinical studies that are available in the public domain, no derogations are made with regard to the use of company owned data, which are included in a dossier submitted nationally by an applicant. Thus, despite all initiatives taken to date and data available to industry and at National Competent Authorities (NCAs), the Committee is currently not able to access all data for use at European level, unless those data are published.

Kooperation Phytopharmaka representatives expressed their understanding for this difficult situation and the request for publication. Nevertheless, according to provisions of the initiative, prior agreement by all industry participants is required. Even though some companies may support the release of data, others emphasise the protection of interest and investment for individual applications that are not intended for general use. MLWP members requested that the possibility of long-term publication in a reasonable time frame be investigated, potentially starting with those individual substances for which the companies involved can agree on.

Members further discussed a differentiated handling of positive and negative results in the interest of monograph establishment and public safety including ways of communication and appropriate follow-up by companies and NCAs based on the knowledge on existing data without publishing confidential data as such. MLWP members and Kooperation Phytopharmaka also agreed that the advantage of publication and subsequently more binding list entries as basis for national applications is not completely apparent to industry yet, considering, that any request on the submission of additional safety data can thus be avoided.

Kooperation Phytopharmaka will discuss the timeframe and option of individualised publication of genotoxicity data with the companies involved. It was proposed that this issue will be addressed again -together with other key topics- at the next AESGP hearing currently scheduled for May 2011.

Dr Steinhoff thanked the MLWP Chair and members for the useful discussion and stressed the importance of a continued constructive dialogue on such essential issues in the field. The MLWP Chair expressed optimism for a cooperative approach by industry in the future in order to improve the knowledge on the safe use of THMPs and to facilitate the regulatory environment in Europe in line with provisions of Directive 2001/83/EC as amended.