IPAR

Public Assessment Report for a
Traditional Herbal Medicinal Product for Human Use
Bronchoforce Chesty Cough Oral Drops
Tinctures of fresh Ivy herb, fresh Thyme herb and liquorice root
TR 2309/010/001
A. Vogel Ireland Limited

Date of Registration: 27th February 2015

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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 Health Products Regulatory Authority (HPRA) has established the Traditional Herbal Medicinal Products Registration Scheme.

The Public Assessment Report reflects the scientific conclusion reached by the 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 A. Vogel Ireland Limited a Certificate of Traditional Use Registration for Bronchoforce Chesty Cough Oral Drops, containing tinctures of *Hedera helix* L. (ivy) fresh shoots, *Thymus vulgaris* L. (thyme) herb *and Glycyrrhiza glabra* L. (liquorice) root.

This application is for a traditional herbal medicianal product as defined by Article 16a(1) of Directive 2001/83/EC, as amended, and was submitted 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 Bronchoforce chesty cough oral drops.
The active ingredients of Bronchoforce chesty cough oral drops are tinctures obtained from *Hedera helix* L., herba (fresh shoots of ivy), *Thymus vulgaris* L., herba (fresh thyme herb) and *Glycyrrhiza glabra* L., radix (liquorice root).

II.1 S.1 Herbal Substance

The herbal substance specifications are considered adequate to control the quality and meet current pharmacopoeial requirements. Batch analytical data demonstrating compliance with the specifications have been provided.

II.2 S.2 Herbal preparation

The herbal preparations are tinctures of fresh ivy shoots, fresh aerial parts of thyme and liquorice root and are manufactured in accordance with the principles of good manufacturing practice (GMP).

The herbal preparation specifications are considered adequate to control the quality and meet current pharmacopoeial requirements. Batch analytical data demonstrating compliance with the specifications have 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 guidelines and the process is considered to be sufficiently validated.

P.4 Control of Other Substances (Excipients)

All ingredients comply with Ph. Eur.

P.5 Control of the Finished Product

The Finished Product Specification is based on the pharmacopoeial monograph for an oral solution 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 packaging components comply with Ph. Eur. and EU food-contact legislation 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 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 Bronchoforce chesty cough oral drops.

III. NON-CLINICAL ASPECTS

Bronchoforce Chesty Cough Oral Drops is a traditional herbal medicinal product as defined by Article 16a(1) of Directive 2001/83/EC as amended.
For this application, Bronchoforce was tested in an *in vitro* Ames test, and was negative for mutagenicity. The study was performed in an appropriate manner. No further non-clinical 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 Bronchoforce Chesty Cough Oral Dropsare acceptable to the standards of today's GLP and safety testing requirements.
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 A. Vogel Ireland Limited under Article 16a of Directive 2001/83/EC, as amended.

Bronchoforce Chesty Cough Oral Drops is a traditional herbal medicinal product used in adolescents and adults as an expectorant for the relief of chesty coughs associated with cold, exclusively based on 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 Bronchoforce Chesty Cough Oral Drops 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 Bronchoforce Chesty Cough Oral Drops 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 is for oral short-term use only, patients are advised to seek the help of a qualified healthcare professional if their symptoms worsen or persist for more than 7 days.

This product should not be used in children, pregnant or breast-feeding women or anyone who is allergic to any of the ingredients of this medicine.

This product may interact with a number of medications, details of which are outlined in the SmPC and patient information leaflet.

This product may not be suitable for patients who have gastritis or a gastric ulcer.

This product contains alcohol and should not be used with other medicines known to interact with alcohol. Taking too much of this product may cause alcohol intoxication.

Side effects which may be experienced by some users of this product include nausea, vomiting, diarrhoea, skin rashes, low potassium levels, problems with the rhythm of the heart and high blood pressure, which in some cases may be severe. How often these side effects occur is not yet known.

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 Bronchoforce Chesty Cough Oral Drops.

The HPRA, on the basis of the data submitted, considered that Bronchoforce Chesty Cough Oral Drops demonstrated adequate evidence of traditional use for the approved indication and no new non-clinical or clinical safety concerns have been identified.

A Certificate of Traditional Use Registration for Bronchoforce Chesty Cough Oral Drops is granted.