

**IPAR**



**Public Assessment Report for a  
Medicinal Product for Human Use**

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Scientific Discussion

Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg mint lozenges  
Amylmetacresol  
2,4 DICHLOROBENZYL ALCOHOL  
PA0577/192/002

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 Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges & Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges, from McDermott Laboratories Ltd., T/A Gerard Laboratories on 26<sup>th</sup> February 2021 for the symptomatic relief of mouth and throat infections.

This application for a marketing authorisation was submitted in accordance with Article 10(3) of Directive 2001/83/EC, referred to as a "hybrid" application.

With Ireland as the Reference Member State in this decentralised procedure, the applicant is applying for Marketing Authorisations for Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan Honey & Lemon 0.6 mg/1.2 mg Lozenge and Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan Mint 0.6 mg/1.2 mg Lozenge with Concerned Member States, IT and SK.

The medicinal products are not subject to prescription.

The Summary of Product Characteristics for (SmPC) for this medicinal product is available on the HPRA's website at [www.hpra.ie](http://www.hpra.ie).

Name of the product	Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges & Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges
Name(s) of the active substance(s) (INN)	2,4-Dichlorobenzyl Alcohol & Amylmetacresol
Pharmacotherapeutic classification (ATC code)	R02AA03
Pharmaceutical form and strength(s)	0.6 mg/1.2 mg Honey and lemon Lozenges & 0.6 mg/1.2 mg Mint Lozenges
Marketing Authorisation Number(s) in Ireland (PA)	PA0577/192/001-002
Marketing Authorisation Holder	McDermott Laboratories Ltd., T/A Gerard Laboratories
MRP/DCP No.	IE/H/0602/001-002/DC
Reference Member State	IE
Concerned Member State	IT, SK

**II. QUALITY ASPECTS****II.1. Introduction**

This application is for;

- Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges
- Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges

**II.2 Drug substance**

The active substances are Amylmetacresol and 2,4-Dichlorobenzyl Alcohol. These are established active substances described in the European Pharmacopoeia and are manufactured in accordance with the principles of Good Manufacturing Practice (GMP).

The active substance specifications are considered adequate to control the quality of each active substance and meets current pharmacopoeial requirements. Batch analytical data demonstrating compliance with this specification has been provided for both active substances.

### **II.3 Medicinal product**

#### **P.1 Composition**

##### *Composition of the medicinal product*

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 guidelines 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 lozenges 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(s) 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 Ph. Eur./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 both Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges & Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges.

### III. NON-CLINICAL ASPECTS

#### III.1 Introduction

This active substance is a hybrid formulation of Strepsils 0.6 mg / 1.2 mg Pastillas para chupar sabor fresa on the European market. No new preclinical data have been submitted. This is acceptable for this type of application.

Pharmacodynamic, pharmacokinetic and toxicological properties of amylmetacresol and dichlorobenzyl alcohol are well known. As amylmetacresol and dichlorobenzyl alcohol are widely used, well-known active substances, the applicant has not provided additional studies and further studies are not required. Overview based on literature review is, thus, appropriate.

#### III.5 Ecotoxicity/environmental risk assessment

Since Amylmetacresol/Dichlorobenzyl alcohol Mylan Lozenges are intended for generic substitution, this will not lead to an increased exposure to the environment. An environmental risk assessment is therefore not deemed necessary.

#### III.6 Discussion on the non-clinical aspects

As amylmetacresol and dichlorobenzyl alcohol are widely used, well-known active substances, the applicant has not provided additional nonclinical studies and further studies are not required. The non-clinical overview on the pre-clinical pharmacology, pharmacokinetics and toxicology provided is adequate. Non-clinical findings are adequately represented in the appropriate sections of the SmPC.

### IV. CLINICAL ASPECTS

#### IV.1 Introduction

Both amylmetacresol and dichlorobenzyl alcohol are well known active substances with established efficacy and tolerability for many years in the approved indication.

The content of the SmPC approved during the decentralised procedure is in accordance with that accepted for the European reference product "Strepsils 0.6 mg / 1.2 mg Pastillas para chupar sabor fresa", marketed by Reckitt Benckiser Healthcare S.A.

For this generic application, the applicant has submitted a single comparative dissolution study in which the amount of drug released from the test formulation (strawberry lozenge) was compared to the reference product, "Strepsils 0.6 mg / 1.2 mg Pastillas para chupar sabor fresa", marketed by Reckitt Benckiser Healthcare S.A.

This approach is considered acceptable given the lozenge formulation which is a locally acting locally administered lozenge formulation.

#### IV.2 Pharmacokinetics

N/A

#### IV.3 Pharmacodynamics

N/A

#### IV.4 Clinical Efficacy

Amylmetacresol and dichlorobenzyl alcohol are well-known active substances with established efficacy in the proposed indication using the lozenge formulation.

An overview of relevant clinical efficacy has been provided, which is based mainly on scientific literature. The overview justifies why there is no need to generate additional clinical data.

With this application, the applicant submitted a supporting comparative dissolution study with two formulations containing Amylmetacresol / Dichlorobenzyl Alcohol in healthy volunteers using a strawberry lozenge.

This approach is considered acceptable for the proposed locally acting locally administered lozenge formulation, in line with current EU guidance.

This was a comparative dissolution study of a new amylmetacresol/ Dichlorobenzyl Alcohol lozenge formulation versus the European reference product, a marketed lozenge formulation (Strepsils® sabor fresa) in healthy volunteers, open-label, crossover (two formulations and two periods) and with random sequence of treatment allocation and five possible residence times in the mouth (3, 5, 8, 10 and 12 minutes).

The main objective was the evaluation of similarity between a proposed lozenge formulation and a reference formulation. The safety of the test formulation was evaluated as secondary objectives.

The dissolution report and subsequent responses provided data to justify similarity between the test and reference products used in the study submitted.

It is noted that only one flavour lozenge is used in this study (strawberry); this can be broadly accepted because it is expected that the minor compositional differences will not impact release.

#### IV.5 Clinical Safety

Amylmetacresol and dichlorobenzyl alcohol are well-known active substances with a well- established safety profile and tolerability.

The applicant has provided a clinical overview, which is based mainly on scientific literature and discusses the available safety data relating to both actives.

The safety profiles of both active substances in the proposed indication for local treatment of short term treatment of throat infections is well established over many years.

No new safety concerns arose in the data presented.

#### Risk Management Plan (RMP)

The applicant has 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 Amylmetacresol/Dichlorobenzyl alcohol 0.6 mg/1.2 mg lozenges.

The revised RMP (version 1.3, dated 23/11/2020) is acceptable. Routine pharmacovigilance and routine risk minimisation activities are considered sufficient.

The applicant is requested to ensure it maintains the RMP in line with the latest SmPC updates and maintains regular reviews.

#### Summary of safety concerns

Important identified risks	Hypersensitivity (e.g. rash, urticaria, pruritus, mouth or pharyngeal oedema)
Important potential risks	Use in paediatric patients < 6 years
Missing information	Use in pregnancy and breastfeeding

#### Periodic Safety Update Report (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

Amylmetacresol and dichlorobenzyl alcohol are well-known active substances with established efficacy and safety in the proposed indication using the lozenge formulation.

An overview of relevant clinical efficacy and safety has been provided, which is based mainly on scientific literature. The overview justifies why there is no need to generate additional clinical data.

For this authorisation, reference is made to the clinical studies of, and experience with the EU reference product Strepsils lozenges. No new clinical studies were conducted. The MAH has demonstrated in vivo similarity to the reference product when it comes to release of the active substances from the lozenges. Based on the totality of data in this study, formulation related differences in drug release are not expected between the test and the reference product. The comparability of oral release between test and reference product is therefore considered sufficiently demonstrated.

Risk management is adequately addressed.

The SmPC is adequate for the use of this product in an OTC setting.

Overall, therapeutic equivalence was proven by pharmaceutical similarity and the comparative in vivo buccal release study. The product information for both products is consistent with that of the European reference product, for adults and children over the age of six.

#### V. OVERALL CONCLUSIONS

Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges and Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges are a generic form of the European reference product "Strepsils 0.6 mg/1.2 mg Pastillas para chupar sabor fresa", marketed by Reckitt Benckiser Healthcare S.A. "Strepsils 0.6 mg / 1.2 mg Pastillas para chupar sabor fresa", marketed by Reckitt Benckiser Healthcare S.A is a well-established medicinal product with a proven chemical-pharmaceutical quality and an established favourable efficacy and safety profile.

For the lozenge formulation, bibliographic data supported by a comparative dissolution study using the EU reference product has been provided which confirmed similarity with the reference product. This approach is acceptable and in line with current EU guidance for this formulation which is a locally acting locally administered lozenge formulation.

The SmPC is consistent with that of the reference product.

Risk management is adequately addressed.

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 totality of the data submitted considered that Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Honey and lemon Lozenges and Amylmetacresol/2,4-Dichlorobenzyl alcohol Mylan 0.6 mg/1.2 mg Mint Lozenges was the same as the reference product and therefore granted a marketing authorisation.

#### VI. REVISION DATE

Revision date: 18.12.2025