

IPAR



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

TR Holder

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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 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 NBTY Europe Ltd a Certificate of Traditional Use Registration for Holland and Barrett Milk Thistle hard capsules containing *Silybum marianum* (L.) (Milk Thistle Fruit)

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 Holland & Barrett milk thistle hard capsules. The active ingredient of Holland & Barrett milk thistle hard capsules is a dry extract obtained from fruit of *Silybum marianum*.

Each capsule contains 133 – 324 mg of extract (as dry, standardised extract) from Milk Thistle fruit (*Silybum marianum* L.) (equivalent to 3325 – 9720 mg of Milk thistle fruits) corresponding to 108 mg of silymarin calculated as silibinin. Extraction solvent is acetone 99.9% v/v.

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 standardised milk thistle dry extract, described in the European Pharmacopoeia, 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 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 Finished Product

The Finished Product Specification is based on the pharmacopoeial monograph for a hard capsule, 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 has 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 bottles and closures comply 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 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 Holland and Barrett milk thistle hard capsules.

III. NON-CLINICAL ASPECTS

Holland & Barrett Milk Thistle Hard Capsules is a traditional herbal medicinal product as defined by Article 16a(1) of Directive 2001/83/EC as amended.

No new preclinical 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 Holland & Barrett Milk Thistle Hard Capsules are 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' (EMA/HMPC/32116/05). In view of the absence of genotoxicity data, the applicant has committed to providing these data within two years of approval if this marketing authorisation.

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 NBTY Europe Ltd under Article 16c of Directive 2001/83/EC, as amended.

Holland and Barrett Milk Thistle hard capsules is a traditional herbal medicinal product used for the symptomatic relief of digestive disorders such as indigestion, feelings of fullness and flatulence 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 Holland and Barrett Milk Thistle hard capsules 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 Holland and Barrett Milk Thistle hard capsules 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.

For details on contraindications, warnings for use and possible side effects of Holland and Barrett Milk Thistle Hard Capsules please see the HPRA website for the SmPC for this THMP.

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 Holland and Barrett Milk Thistle hard capsules. The HPRA, on the basis of the data submitted, considered that Holland and Barrett Milk Thistle hard capsules 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 Holland and Barrett Milk Thistle hard capsules is granted.

VI. REVISION DATE

February 2021

VII. UPDATES

Procedure number	Product Information affected	Date of start of procedure	Date of end of procedure	Approval/non approval
CRN00C3M1 TR Transfer	SPC section 7, 8 Package Leaflet New TR Holder: Holland & Barrett Limited, Cedar Drive, Dublin Airport Logistics Park, Saint Margarets, Co Dublin, K67 E0C5, Ireland New TR number: TR23157/013/001	26/02/2021	26/02/2021	Approved