

# Herbal and Traditional Herbal Medicinal Products – Experiences in Germany

Prof. Dr. Werner Knöss



## Disclaimer

- With reference to the publication policy of the European Medicines Agency (EMA) I do not speak on behalf of the Committee on Herbal Medicinal Products (HMPC) or the EMA.
- The views expressed here may not be understood or quoted as being made on behalf of the HMPC/EMA or reflecting the position of the HMPC/EMA.



# Legislation – Traditional Medicines

30.4.2004

EN

Official Journal of the European Union

L 136/85

## DIRECTIVE 2004/24/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 31 March 2004

herbal medicinal products, Directive relating to medicinal products for human use



Having regard to the proposal from the Commission

Having regard to the Treaty on Economic and Social Community

Acting in accordance with Article 251 of the Treaty



- (4) Having regard to medicinal products, it is desirable to provide a simplified procedure for their marketing. However, this simplified procedure should be used



# Legislation – Traditional Medicines

30.4.2004

EN

Official Journal of the European Union

L 136/85



THE EUROPEAN

Having re  
Community

Having reg

Having reg  
Social Com

Acting in a  
251 of the

ne

not eligible for  
these products  
nacted differing  
ifferences that  
laid down in  
in traditional  
ity and lead to  
petition between  
may also have  
health since the  
nd efficacy are



istics of these  
tradition, it is  
ed registration  
ncinal products.

However, this simplified procedure should be used

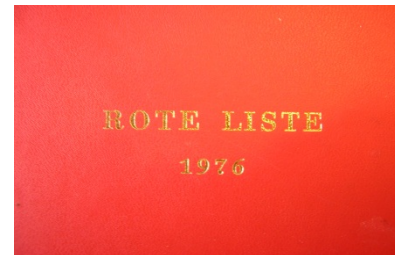
# Overview

- I. Introduction
- II. Regulation of Phytomedicines in Germany
- III. Regulatory Concepts and Products
- IV. Germany and the European Network



# Complementary and Alternative Medicines in Germany

- Science
- Research and Education
- Tradition
  
- Options and Limits



Phytotherapy  
Homeopathy  
Anthroposophy



# Medicinal Products

Chemically defined	Dose-dependent effect
Herbal	Dose-dependent effect
Traditional herbal	Plausible effect
Homoeopathic	Homeopathic principle
Anthroposophic	Anthroposophic principle
TCM	Mixed approach
Ayurvedic	Mixed approach





# Borderline

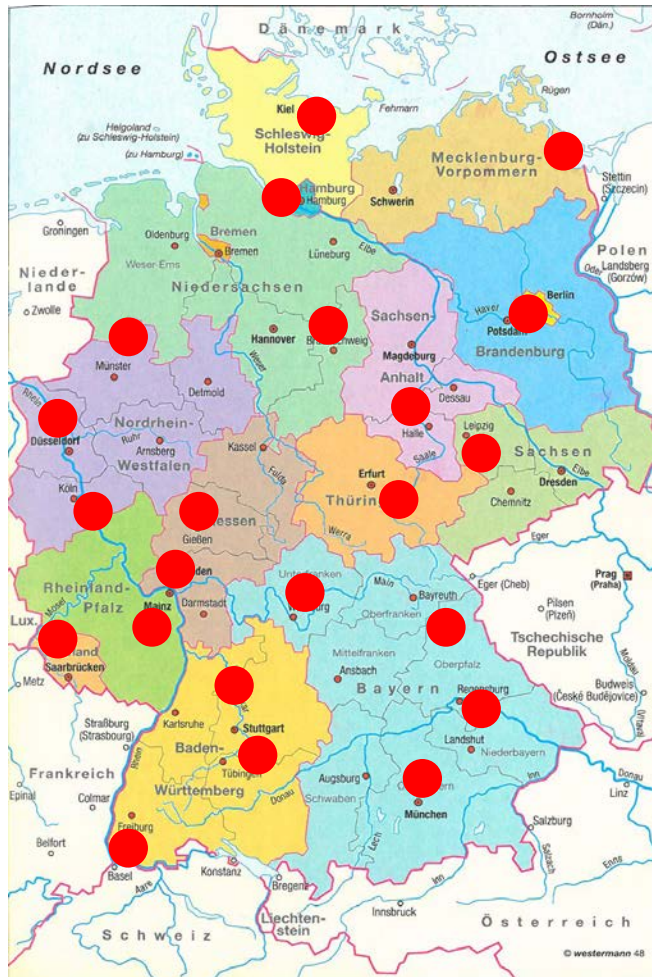




# Products in a Pharmacy



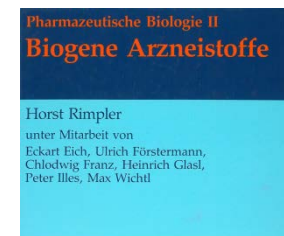
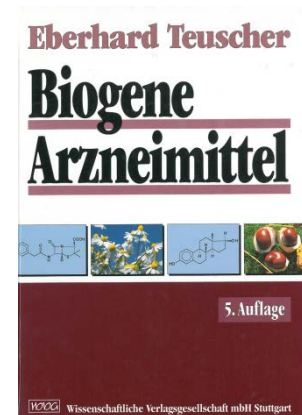
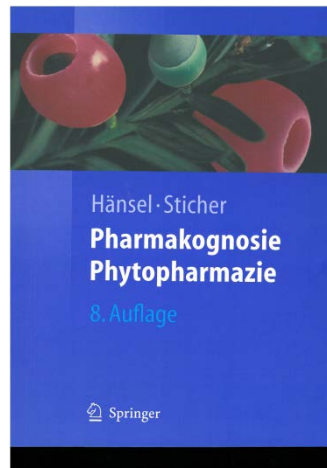
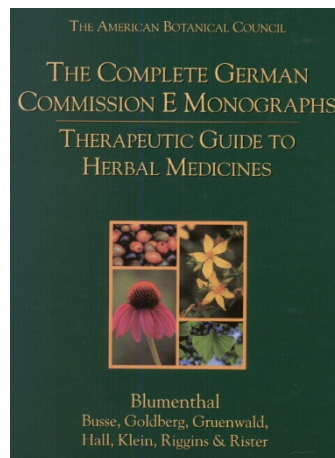
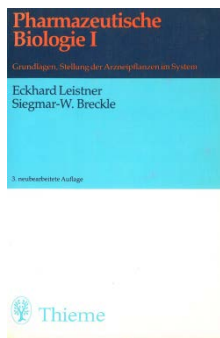
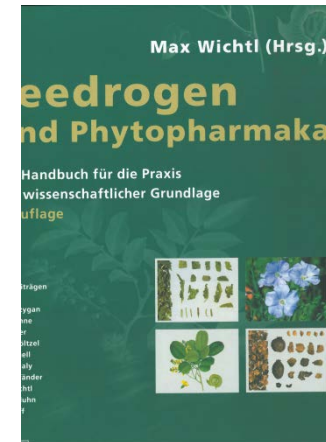
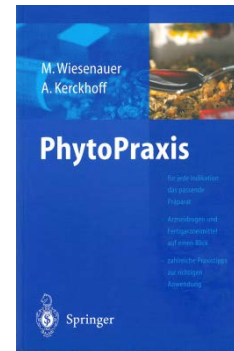
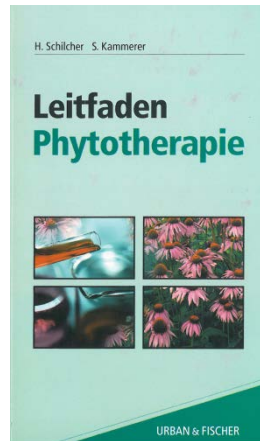
# Pharmaceutical Universities



About 20% of total education in Pharmaceutical Biology



# Textbooks Pharmacy and Phytotherapy





## Deutscher Bundestag (German Parliament) Ausschussbericht vom 28.04.1976 BT-DS 7/5091

„ ... von der Tatsache ausgegangen, dass auf dem Gebiet der Arzneimitteltherapie **mehrere Therapierichtungen nebeneinander** bestehen, die von **unterschiedlichen theoretischen Denkansätzen** und **wissenschaftlichen Methoden** ausgehen ...“

„ ...politische Zielsetzung, ... dass sich **im Zulassungsbereich** der in der Arzneimitteltherapie vorhandene **Wissenschaftspluralismus** deutlich widerspiegeln muss.“

**... pluralism in therapy ...**



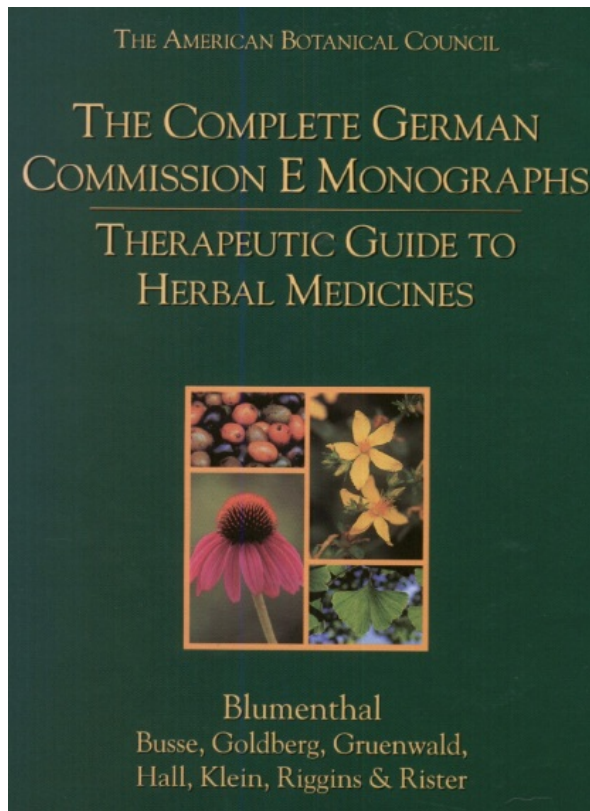


# German Medicines Act (AMG)

- **AMG Article 4 (26, 29, 33) Definitions**
  - Expert-Commissions Article 25 (6) AMG
  - Commission C Anthroposophy
  - Commission D Homeopathy
  - Commission E Phytotherapy
  - Commission Article 109a (3) AMG
- **AMG Article 25 (7)**
  - „... Medicinal products of a particular therapeutic system (Phytotherapy, Homeopathy, Anthroposophy), ...“
- **AMG Article 25 (7a) Children and Adolescents**
  - see Commissions



# Commission E Monographs – Regulatory and Educational Standards



Elaboration of  
monographs until  
1994



# History of Regulation of Herbal Medicines

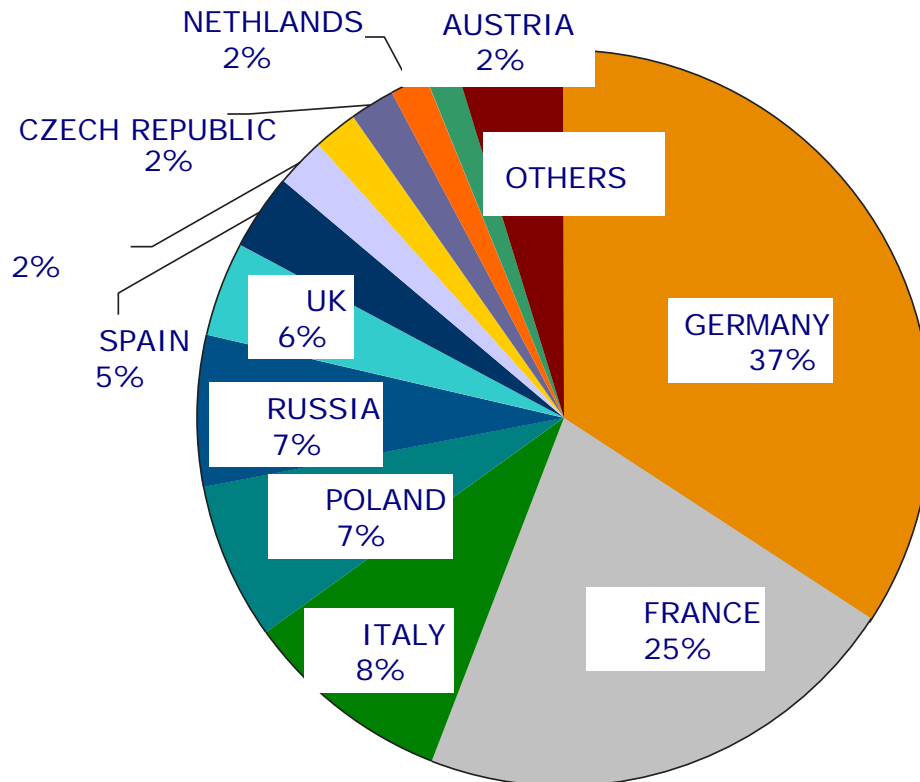
- 1976 German Parliament emphasises therapeutic pluralism in health care
- 1976 German medicines act (Arzneimittelgesetz AMG)  
notification of 148.000 existing medicinal products  
marketing authorisation of new medicinal products
- 1994 5th amendment of AMG  
transition according articles 105 and 109a  
applicants had to proof also safety and efficacy
- 2004 Directive 2004/24 EC “Traditional herbal medicinal products”
- 2005 Registration of Traditional herbal medicinal products,  
implementation by 14. AMG-novellation



# Market for Herbal Medicinal Products

## Herbal Medicinal Products

In Europe, ~ 4 Bill. €



Source: IMS 2005

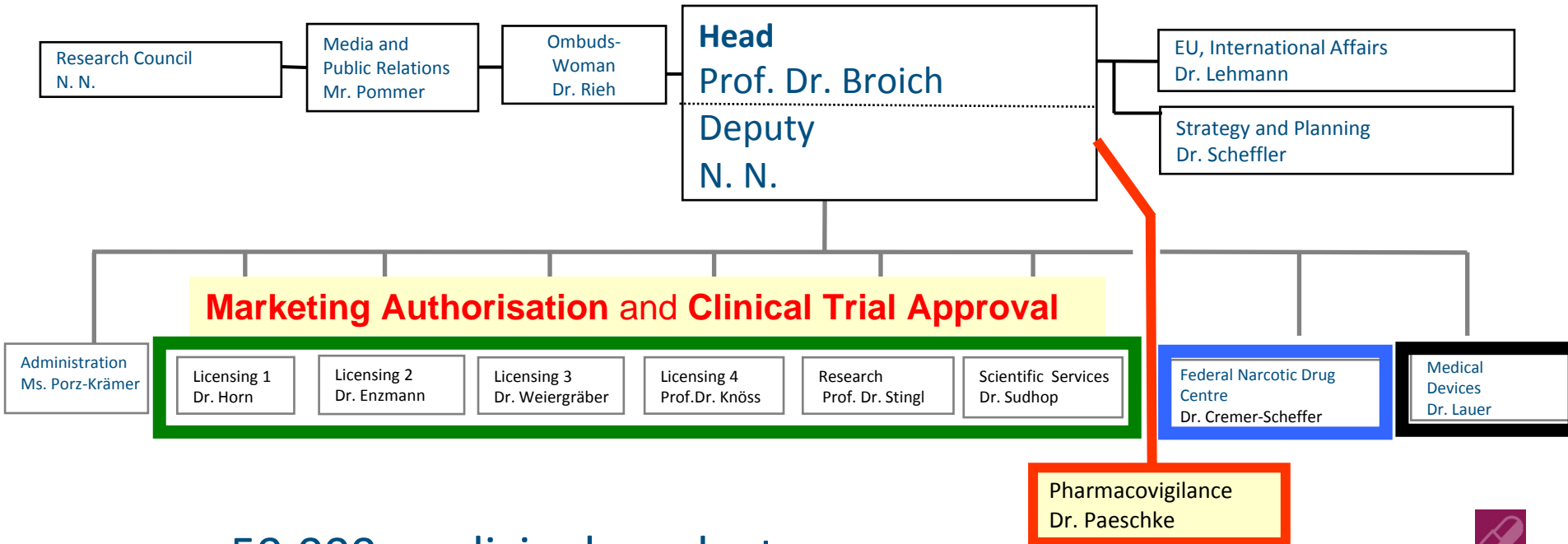
## Germany (CAM and TM)

- longstanding tradition
- department at BfArM with 57 staff members
- about 700 pharmaceutical companies
- about 10,000 medicinal products marketed
- about 2000 (traditional) herbal medicinal products





# BfArM – Structure and Tasks



59.000 medicinal products

**Pharmacovigilance**



# Licensing 4, BfArM

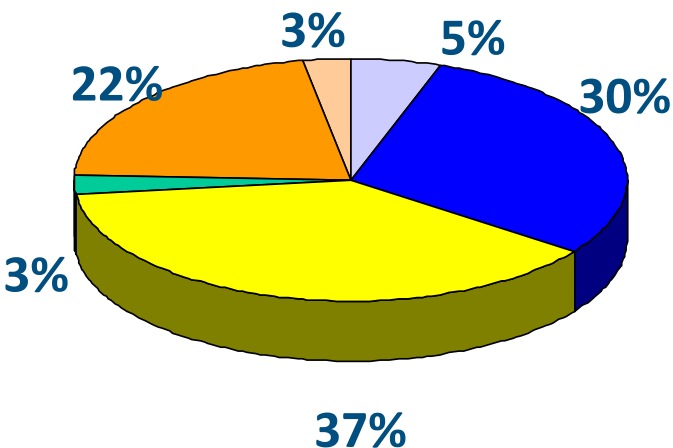
Prof. Dr. W. Knöss

**Unit 41**  
Procedural Management

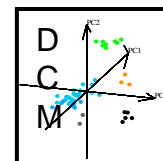
**Complementary and Alternative Medicines and Traditional Medicines**  
(57 staff members)

**Unit 42**  
Herbal and Traditional Medicinal Products

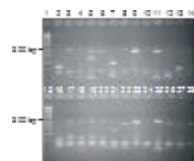
**Unit 43**  
Homoeopathic and Anthroposophic Medicinal Products



- biologists
- pharmacists
- physicians
- chemists
- food chemists
- pharmacologists



Research  
Medicinal Plants



# Basic Figures – CAM and Traditional Medicines in Germany

## Regulation since 1976 – Medicinal Products Act

- 2000 herbal medicinal products (23% combinations)
  - 1750 licensed herbal medicinal products (15%)
  - 250 registered trad. herbal medicinal products (40%)
- 1350 licensed homeopathic medicinal products (86%)
- 1050 licensed anthroposophic medicinal products (62%)
- 3900 registered homeopathic and anthroposophic (48%) medicinal products



# Communication – Website, Hearings




TradReg | 2013

Future and global perspectives of regulation of herbal and traditional medicinal products.





# Communication – Scientific Advice

## Scientific advice - applications

2005	20
2006	29
2007	70
2008	88
2009	42
2010	68
2011	52
2012	46
2013	62
2014	46 (August)

## Advice and cooperation

Indications

Proof of tradition

Divergent opinions in  
different Member States

Combinations

Quality

Economic considerations

CTD



# Evaluation of (Traditional) Herbal Medicinal Products



Medicinal plant



Herbal substance



Herbal preparation

Finished product



**GACP**

**GMP**

Defined by manufacturing  
process and specifications

Marketing Authorisation

Registration

**Pharmacovigilance**

Consumer information; labeling; advertising

**Efficacy**

new trials

bibliographic

traditional use

**Safety**

new tests

bibliographic

expert report  
bibliographic  
new tests

**Quality Control**

Good Manufacturing Practices

Good Agricultural and  
Collection Practices

applies to registered  
and to authorised  
HMP

may be replaced by a  
monograph or the list  
from the HMPC in  
registrations

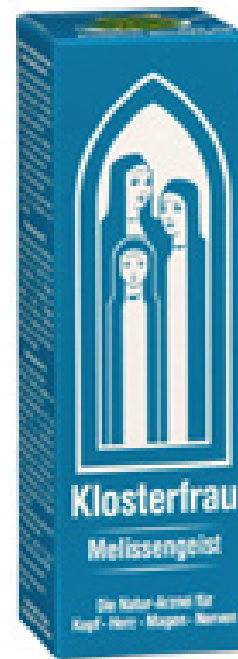
identical for  
marketing  
authorisations and  
registrations

new

well-established

traditional

# Example of a Traditional Herbal Medicinal Product – First Registration in EU in 2005



- Traditional registration
- Access to the market
- Combination
- Quality guideline conform
- Plausibility
- Additional data

## Example of a Traditional Herbal Medicinal Product – Herbal Tea



Herbal tea

Transition from existing  
regulation

Fast track procedure  
because of complete  
documentation

Decision within six  
weeks after  
application



# Example of a Traditional Herbal Medicinal Product



Problem from re-licensing  
(Nachzulassung)

Court case

Acceptance of tradition

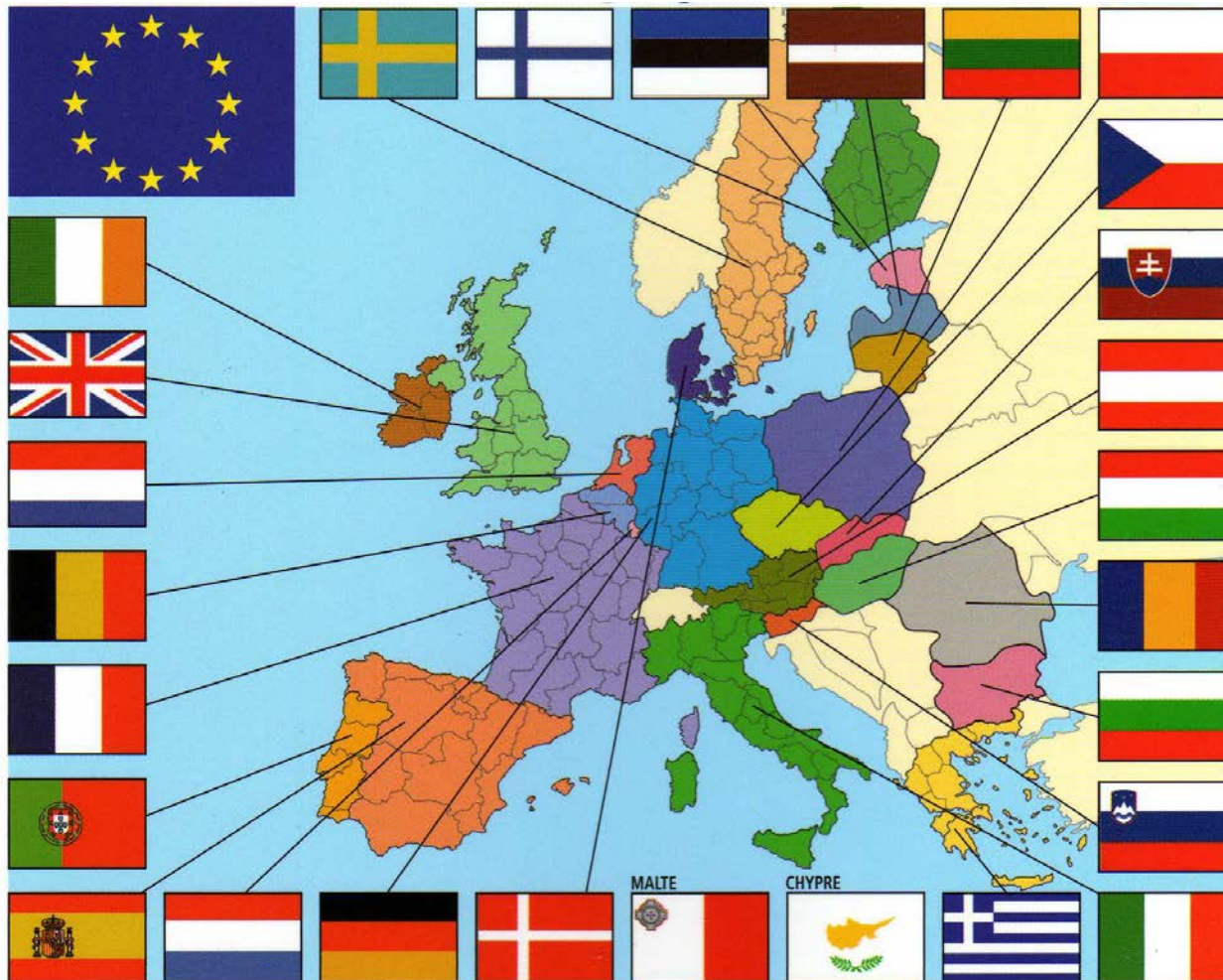
Suitable quality

documentation

supported by Scientific

advice

# European Regulation – United in Diversity



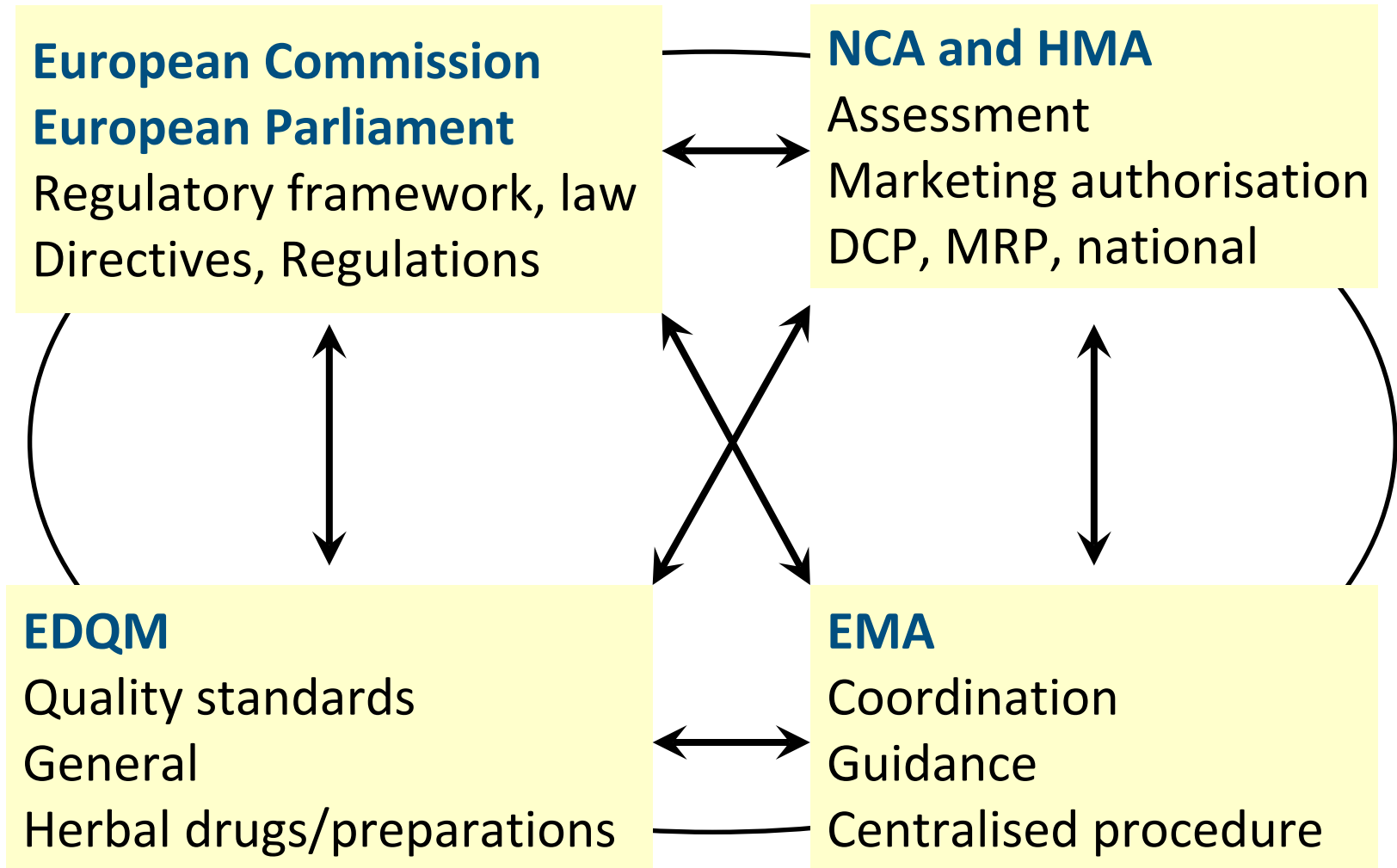
**Political union of  
28 Member  
States**

**about 500 Mio  
inhabitants**

**24 official  
languages**



# The European Network

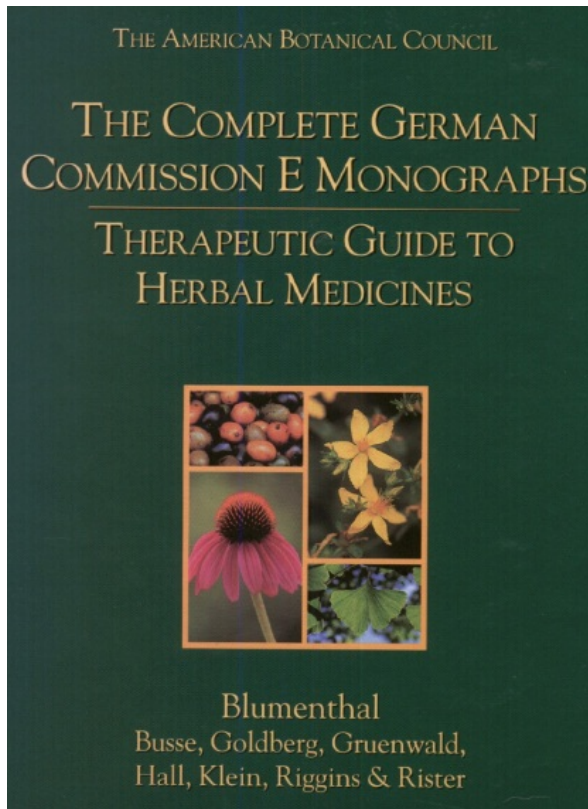


# European Medicines Agency - EMA

- Central European Authority with specified tasks
- Committees and Working Parties
- Herbal Medicinal Products Committee – HMPC
- Monographs and List Working Party - MLWP
- Coordination of National Competent Authorities



# From Commission E to Community Monographs



Harmonised assessment  
(but „United in diversity“)



# Current Sets of Monographs

- **HMPC-Monographs**

Legally enforced, official monographs for Member States of the European Union

- **Commission E monographs**

German-based standard since the 1990ies, out of age

- **ESCOP**

European societies on phytotherapy,  
scientific compilation of bibliographic data, not official

- **WHO**

Bibliography to suggest models to members of WHO,  
not official



# European Medicines Agency

**CHMP**  
Committee on Medicinal Products for Human Use

**COMP**  
Committee on Orphan Medicinal Products

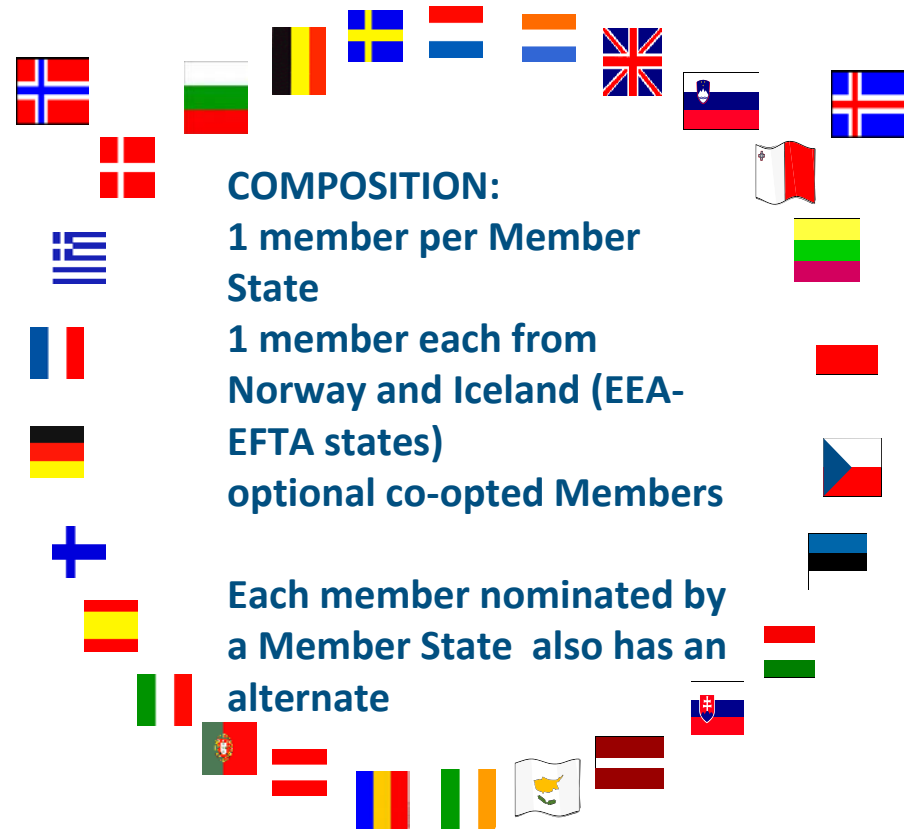
**PDCO**  
Paediatric Committee

**HMPC**  
**Committee on Herbal Medicinal Products**

**CAT**  
Committee on Advanced Therapies

**CVMP**  
Committee on Medicinal Products for Veterinary Use

**PRAC**  
Pharmacovigilance Risk Assessment Committee



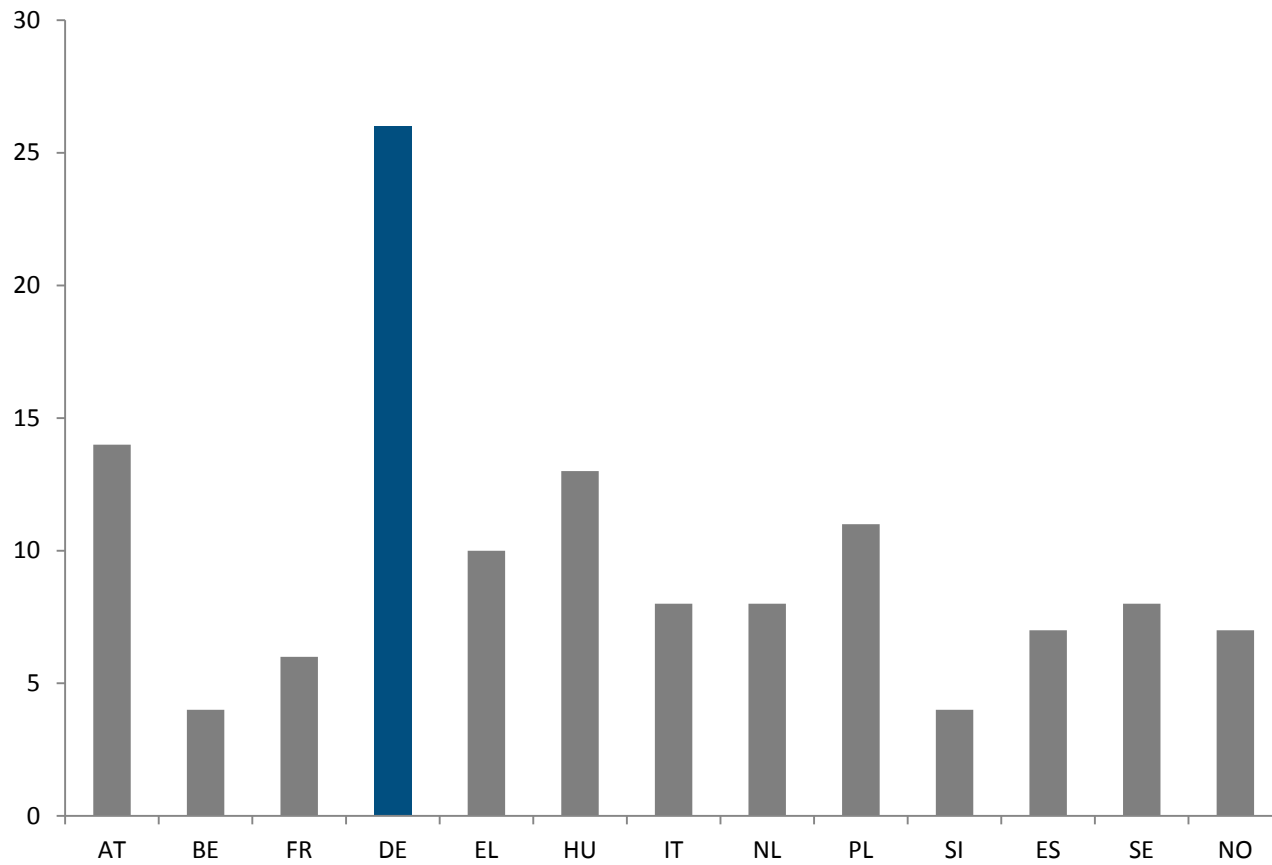
**HMPC Chairperson**

**Werner Knöss**

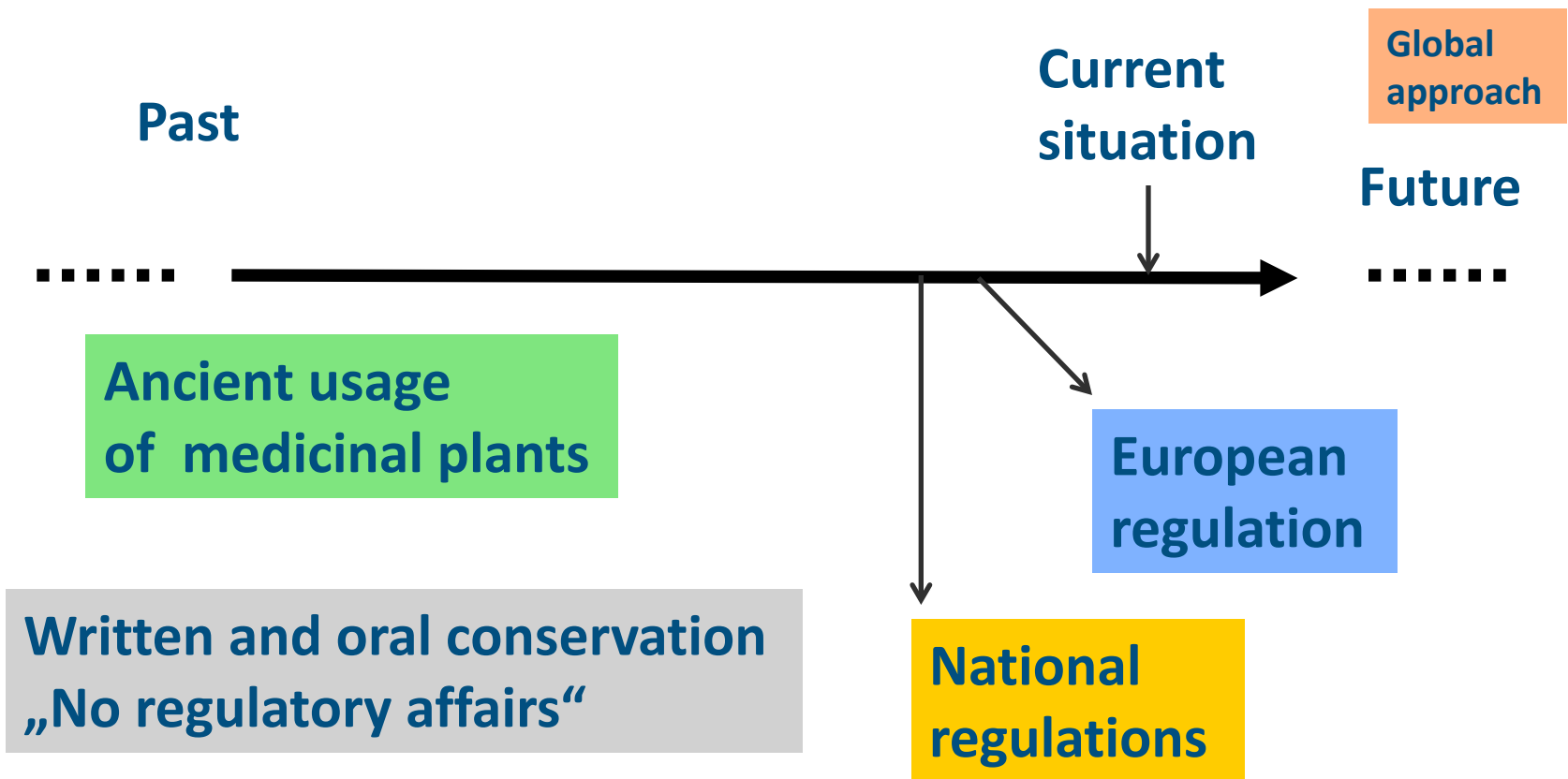
**MLWP Chairperson**

**Ioanna Chinou**

# Input in Development of Monographs Rapporteurships



# Regulatory Development



## Conclusions

- Long history, scientific and regulatory expertise
- Access to the market of (Traditional) Herbal Medicinal Products is linked to assessment of quality, efficacy and safety
- Post-marketing surveillance
- National and European Procedures
- Harmonisation based on European standards provided by the HMPC (EMA)
- Transparency for users





**Thank you for your attention!**

