

## **Vitabiotics Devil's Claw tablets**

**THR 00387/0056**

**UKPAR**

### **TABLE OF CONTENTS**

<b>Lay summary</b>	<b>Page 2</b>
<b>Scientific discussion</b>	<b>Page 3</b>
<b>Steps taken for assessment</b>	<b>Page 12</b>
<b>Summary of product characteristics</b>	<b>Page 13</b>
<b>Product information leaflet</b>	<b>Page 17</b>
<b>Labelling</b>	<b>Page 19</b>

## VITABIOTICS DEVIL'S CLAW TABLETS

**THR 00387/0056**

### **LAY SUMMARY**

The Medicines and Healthcare products Regulatory Agency (MHRA) granted Vitabiotics Limited a Traditional Herbal Registration Certificate for the traditional herbal medicinal product Vitabiotics Devil's Claw tablets (Traditional Herbal Registration number: THR 00387/0056) on 26 September 2011. This product will be referred to as Devil's Claw tablets in the remainder of this report. Devil's Claw tablets are available without prescription and can be bought from pharmacies and other outlets.

Devil's Claw tablets is a traditional herbal medicinal product used for the relief of backache, rheumatic or muscular pain, and general aches and pains in the muscles and joints, based on traditional use only. The active ingredient in Devil's Claw tablets comes from Devil's claw (*Harpagophytum procumbens* D.C. and/or *H. zeyheri* L. Decne) root.

This registration is based exclusively upon the longstanding use of Devil's claw root as a traditional herbal medicine and not upon data generated from clinical trials. There is no requirement under the Traditional Herbal Registration Scheme to prove scientifically that a product works.

No new or unexpected safety concerns arose from this application and it was, therefore, decided that a Traditional Herbal Registration Certificate could be granted.

**VITABIOTICS DEVIL'S CLAW TABLETS**

**THR 00387/0056**

**SCIENTIFIC DISCUSSION**

**TABLE OF CONTENTS**

<b>Introduction</b>	<b>Page 4</b>
<b>Pharmaceutical assessment</b>	<b>Page 5</b>
<b>Non-clinical assessment</b>	<b>Page 8</b>
<b>Clinical assessment</b>	<b>Page 9</b>
<b>Overall conclusions and risk assessment</b>	<b>Page 11</b>

## **INTRODUCTION**

The MHRA granted a Traditional Herbal Registration Certificate for the traditional herbal medicine Devil's Claw tablets (THR 00387/0056) to Vitabiotics Limited on 26 September 2011. This product is on the general sales list (GSL).

This application was submitted according to Article 16.c of Directive 2001/83 EC, as amended, as part of the Traditional Herbal Medicines Registration Scheme. The product is used for the relief of backache, rheumatic or muscular pain, and general aches and pains in the muscles and joints, based on traditional use only.

The data supplied by the applicant demonstrate 30 years of traditional use of Devil's claw root, including at least 15 years of use in the European Community. A satisfactory review of the available safety data on Devil's claw root has also been provided, together with an Expert Safety Report supporting the proposed product.

## PHARMACEUTICAL ASSESSMENT

**HERBAL SUBSTANCE:**                      **DEVIL'S CLAW ROOT**

**Scientific name of the plant:**        *Harpagophytum procumbens* DE CANDOLLE  
or *Harpagophytum zeyheri* DECNE

**Plant family:**                              Pedaliaceae

The Devil's claw plants used in this product are cultivated in Namibia. The roots are harvested manually from April to October and, following harvesting, the roots are dried in the sun.

Confirmation has been provided that the herbal substance is produced in line with the Guideline on Good Agricultural and Collection Practice (GACP) EMEA/HMPC/246816/2005 and that the herbal substance has not been fumigated or treated with ionizing radiation.

### **Control of Herbal Substance**

An appropriate specification based on the Ph Eur monograph for Devil's claw root is applied and is acceptable. The specification is supported by the batch data provided.

### **Container Closure System**

Satisfactory details of the container closure system are provided and confirmation has been given that all components of the container closure system comply with Directive 2008/39/EC relating to plastic materials and articles intended to come into contact with foodstuffs.

### **Stability**

Confirmation is given that the herbal substance will be tested prior to being used to make the herbal preparation. A shelf-life for the herbal substance is not appropriate because it is only a precursor of the active substance, the herbal preparation. The actual guideline requires stability testing data for the herbal preparation and the herbal product in the application documents and not for the herbal substance.

**HERBAL PREPARATION:**                      **DEVIL'S CLAW ROOT DRY EXTRACT**

**Ratio of the herbal substance to the herbal preparation (native):**        3.5-5:1

**Extraction solvent:**                              Ethanol 60 % (V/V)

### **Manufacture**

A satisfactory description of the manufacturing process of the herbal preparation and flow diagram has been provided. The in-process controls are satisfactorily detailed. The manufacture of the herbal preparation is considered a standard procedure.

Certificates of Analysis for all materials used in the manufacture of the herbal preparation have been provided.

### **Control of Herbal Preparation**

A satisfactory specification with appropriate tests and limits has been provided for the herbal preparation.

Satisfactory analytical procedures are used to control the quality of the herbal preparation. Analytical procedures have been validated, as appropriate.

Certificates of Analysis have been provided for production batches of the herbal preparation, demonstrating satisfactory compliance with the proposed specification.

### **Reference Standards or Materials**

Suitable details have been provided for the reference standards used.

### **Container Closure System**

Confirmation is provided that all components of the container closure system used to store the herbal preparation comply with Directive 2008/39/EC relating to plastic materials and articles intended to come into contact with foodstuffs.

### **Stability**

Stability studies have been performed in accordance with current guidelines. The proposed re-test period for the Devil's claw root dry extract is acceptable.

## **HERBAL PRODUCT: VITABIOTICS DEVIL'S CLAW TABLETS**

### **Description and Composition of the Herbal Product**

Devil's Claw tablets are green, oval shaped, film coated tablets. Each tablet contains 600mg of extract (as dry extract) from Devil's claw root and the excipients maltodextrin, silica colloidal anhydrous, microcrystalline cellulose, croscarmellose sodium, stearic acid, magnesium stearate, hypromellose, copper chlorophyllin, titanium dioxide (E171) and glycerol.

The compatibility of the herbal preparation with the excipients is demonstrated by the stability testing results. The excipients are controlled in line with their respective Ph Eur monograph and representative Certificates of Analysis are provided to demonstrate full compliance with the Ph Eur.

The magnesium stearate and stearic acid used in the product is confirmed to be of vegetable origin and, therefore, poses no TSE risk.

### **Manufacture**

A flow diagram outlining the various stages of the manufacturing process and the in-process controls is provided.

In-process controls are appropriate considering the nature of the product and the method of manufacture. Currently, process validation has not been carried out on commercial batches, however, as the manufacturer has extensive experience and has committed to carry out process validation on commercial batches following an appropriate process validation protocol, this is acceptable.

**Control of Herbal Product**

The finished product specification is satisfactory. Acceptance limits have been justified with respect to conventional pharmaceutical requirements and, where appropriate, safety. Test methods have been described and have been adequately validated, as appropriate. Batch data have been provided and comply with the release specification.

**Reference Standards or Materials**

Suitable details have been provided for the reference standards used.

**Container Closure System**

The tablets are enclosed in PVC/PVDC blister strips of 15 tablets, which are then packed into a carton. The pack sizes are 30, 60 or 90 tablets, although not all pack sizes may be marketed.

Suitable specifications have been provided by the packaging suppliers and it has been confirmed that all primary packaging materials comply with Directive 2008/39/EC.

**Stability**

Finished product stability studies have been conducted in accordance with current guidelines. Based on the results, a product shelf-life of 30 months is appropriate when the storage precautions 'Do not store above 25° C' and 'Store in the original package' are applied.

**Pharmaceutical Expert**

The Quality Overall Summary has been written by a pharmacist with suitable experience.

**Summary of Product Characteristics, Labelling and Patient Information Leaflet**

All product literature is satisfactory.

A package leaflet has been submitted to the MHRA along with results of consultations with target patient groups ("user testing"), in accordance with Article 59 of Council Directive 2001/83/EC. The results indicate that the package leaflet is well-structured and organised, easy to understand and written in a comprehensive manner. The test shows that the patients/users are able to act upon the information that it contains.

**Conclusion**

The grant of a Traditional Herbal Registration is acceptable.

## **NON-CLINICAL ASSESSMENT**

### **NON-CLINICAL ASPECTS**

The Expert Safety Report submitted by the applicant lists relevant references to published work studying the toxicology of Devil's claw root.

### **NON-CLINICAL OVERVIEW**

The applicant has submitted a literature review with this application. An Expert Safety Report was provided, which included reviews of some non-clinical data. The Expert Safety Report was written by a suitably qualified professional.

The overview submitted in support of this application is satisfactory.

Due to a shortage of published data on Devil's claw root, it is not possible to assess if the safety package for the phytochemical constituents of these active ingredients is acceptable to the standards of today's GLP and safety testing requirements. However, the information supplied demonstrating traditional use is acceptable and thus the lack of provision of a complete standard safety package is acceptable and in compliance with guideline EMEA/HMPC/32116/05.

Assurance was provided that the results of genotoxicity testing will be provided before renewal of the registration.

### **SUMMARY OF PRODUCT CHARACTERISTICS (SmPC)**

The SmPC for this product is satisfactory from a non-clinical point of view.

### **ENVIRONMENTAL RISK ASSESSMENT**

An environmental risk assessment is not required for herbal medicinal products according to guidance CPMP/SWP/4447/00.

### **CONCLUSION**

There are no objections to granting of a Traditional Herbal Registration from a non-clinical point of view.



## **CLINICAL ASSESSMENT**

### **PROPOSED INDICATION**

The applicant has submitted the following therapeutic indication:

“A traditional herbal medicinal product used for the relief of backache, rheumatic or muscular pain, and general aches and pains in the muscles and joints based on traditional use only.”

The indication is acceptable.

### **POSOLGY AND METHOD OF ADMINISTRATION**

The applicant has submitted the following:

“For oral administration.

For adults and the elderly, take one tablet twice a day (in the morning and in the evening) Tablets should be swallowed with some water or other liquid.

The use in children or adolescents under 18 years of age is not recommended (see section 4.4 special warnings and precautions for use).

If symptoms worsen or do not improve after 4 weeks a doctor or qualified healthcare practitioner should be consulted.”

This is acceptable.

### **EFFICACY**

No clinical efficacy data is required for registration of Traditional Herbal Medicinal Products (THMP).

### **EVIDENCE OF TRADITIONAL USE**

Article 16 c 1 (c) 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 European Community.

The published Committee on Herbal Medicinal Products (HMPC) Assessment Report and Community Monograph for Devil’s claw root adopted by the HMPC adequately cover the evidence for traditional use of the herbal preparation in the product under assessment for at least 30 years. The requirements of the Directive are considered to be met.

### **SAFETY REVIEW**

Article 16 c 1 (d) requires the applicant to provide a bibliography of the safety data together with an Expert Safety Report.

The HMPC Assessment Report for Devil’s claw root covers the bibliographic data available and the safety of Devil’s claw root has been demonstrated. The SmPC is in line with the HMPC Community Monograph.

**PRODUCT LITERATURE**

The SmPC, PIL and labelling for this product are medically satisfactory.

**CONCLUSION**

A Traditional Herbal Registration may be granted.

## **OVERALL CONCLUSION AND RISK ASSESSMENT**

### **QUALITY**

The quality data submitted with this application are satisfactory.

### **NON-CLINICAL**

No new non-clinical data were submitted with this application. However, assurance was provided that the results of genotoxicity testing will be provided before renewal of this registration. This is satisfactory.

### **EFFICACY AND SAFETY**

No clinical efficacy data are required for registration of a THMP.

The published HMPC Assessment Report and Community Monograph for Devil's claw root adopted by the HMPC adequately cover the evidence for traditional use of the extract in the product under assessment for at least 30 years and the non-clinical and clinical safety issues associated with Devil's claw root.

The SmPC, PIL and labelling are satisfactory.

### **RISK ASSESSMENT**

The quality of the product is acceptable and no new non-clinical or clinical safety concerns have been identified. The risk: benefit balance is acceptable and a Traditional Herbal Registration may be granted.

## **VITABIOTICS DEVIL'S CLAW TABLETS**

**THR 00387/0056**

### **STEPS TAKEN FOR ASSESSMENT**

- 1 The MHRA received the Traditional Herbal Registration application on 25 May 2010.
- 2 Following standard checks and communication with the applicant the MHRA considered the application valid on 4 June 2010.
- 3 Following assessment of the application the MHRA requested further information relating to the quality dossier on 25 November 2010 and the clinical dossier on 23 December 2010.
- 4 The applicant responded to the MHRA's request, providing further information on the quality dossier on 4 March 2011.
- 5 Following assessment of the response the MHRA requested further information relating to the quality dossier on 4 March 2011.
- 6 The applicant responded to the MHRA's requests, providing further information on the quality and clinical dossiers on 1 April 2011.
- 7 Following assessment of the response the MHRA requested further information relating to the quality dossier on 7 April 2011.
- 8 The applicant responded to the MHRA's request, providing further information on the quality dossier on 13 May 2011.
- 9 A THR was granted on 26 September 2011.

## **SUMMARY OF PRODUCT CHARACTERISTICS**

### **1 NAME OF THE MEDICINAL PRODUCT**

Vitabiotics Devil's Claw tablets

### **2 QUALITATIVE AND QUANTITATIVE COMPOSITION**

Each film-coated tablet contains 600mg of extract (as dry extract) from Devil's Claw root (*Harpagophytum procumbens* D.C. and /or *H. zeyheri* L. Decne, radix) (Equivalent to 2100mg-3000mg of Devil's Claw root).

Extraction solvent: Ethanol 60% v/v

For full list of excipients, see section 6.1.

### **3 PHARMACEUTICAL FORM**

Film Coated Tablets

Green Oval Shaped Film Coated Tablet

### **4 CLINICAL PARTICULARS**

#### **4.1 Therapeutic indications**

A traditional herbal medicinal product used for the relief of backache, rheumatic or muscular pain, and general aches and pains in the muscles and joints based on traditional use only.

#### **4.2 Posology and method of administration**

For oral administration.

For adults and the elderly, take one tablet twice a day (in the morning and in the evening) Tablets should be swallowed with some water or other liquid.

The use in children or adolescents under 18 years of age is not recommended (see section 4.4 special warnings and precautions for use).

If symptoms worsen or do not improve after 4 weeks a doctor or qualified healthcare practitioner should be consulted.

#### **4.3 Contraindications**

Hypersensitivity to the active substance or any of the excipients.

#### **4.4 Special warnings and precautions for use**

Do not exceed the stated dose.

If the condition worsens during the use of the product or symptoms persist for more than 4 weeks consult a doctor or qualified healthcare practitioner.

The use of this product in children or adolescents under 18 years of age is not recommended because data are not sufficient and medical advice should be sought.

If articular pain accompanied by swelling of joint, redness or fever are present a doctor should be consulted.

Caution should be taken when Devil's claw is administered to patients with cardiac disorders.

As a general precaution, patients with gastric or duodenal ulcer should not use Devil's claw preparations

#### **4.5 Interaction with other medicinal products and other forms of interaction**

None Known

#### **4.6 Fertility, pregnancy and lactation**

The safety of the product during pregnancy and lactation has not been established. In the absence of sufficient data the use in pregnancy and lactation is not recommended.

Studies on the effects on fertility have not been performed.

#### **4.7 Effects on ability to drive and use machines**

No studies on the effect on the ability to drive and use machines have been performed. In rare cases some patients have experienced dizziness and somnolence while taking Devil's claw.

#### **4.8 Undesirable effects**

Gastrointestinal disorders: diarrhoea, nausea, vomiting, abdominal pain. Central Nervous system disorders: headache, dizziness. Skin disorders: allergic skin reactions (rash and itching) The frequency is not known.

If other adverse reactions not mentioned in this leaflet occur, a doctor or qualified healthcare practitioner should be consulted.

#### **4.9 Overdose**

There are no data on human overdose with Devil's claw. Symptomatic and supportive measures should be taken as appropriate.

### **5 PHARMACOLOGICAL PROPERTIES**

#### **5.1 Pharmacodynamic properties**

Not required as per Article 16c (1) (a) (iii) of Directive 2001/83/EC as amended.

#### **5.2 Pharmacokinetic properties**

Not required as per Article 16c (1) (a) (iii) of Directive 2001/83/EC as amended.

#### **5.3 Preclinical safety data**

Tests on reproductive toxicity, genotoxicity and carcinogenicity have not been performed.

## **6 PHARMACEUTICAL PARTICULARS**

### **6.1 List of excipients**

#### Extract

Maltodextrin

Silica colloidal anhydrous

#### Tablet Core

Maltodextrin

Microcrystalline cellulose

Croscarmellose Sodium

Stearic Acid

Magnesium Stearate

Silica Colloidal Anhydrous

#### Tablet coating

Hypromellose

Copper Chlorophyllin

Titanium Dioxide (E171)

Glycerol

### **6.2 Incompatibilities**

None known.

### **6.3 Shelf life**

30 months

### **6.4 Special precautions for storage**

Do not store above 25 °C. Store in the original packaging.

### **6.5 Nature and contents of container**

Tablets are packed into PVC/PVDC blister strips of 15 tablets in the following pack sizes; 30, 60, 90 Tablets and packed into a Carton

Not all pack sizes may be marketed.

### **6.6 Special precautions for disposal**

No special requirements.

## **7 MARKETING AUTHORISATION HOLDER**

VITABIOTICS

1 ASPLEY WAY

LONDON

NW2 7HF

## **8 MARKETING AUTHORISATION NUMBER(S)**

THR 00387/0056

**9 DATE OF FIRST AUTHORISATION/RENEWAL OF THE  
AUTHORISATION**

26/09/2011

**10 DATE OF REVISION OF THE TEXT**

26/09/2011



## PATIENT INFORMATION LEAFLET

  
**devil's claw**  
tablets

Patient Information Leaflet  
Devil's Claw Root Extract 600mg



### WHAT IS IN THIS LEAFLET

1. What this product is and what it is used for
2. Before you take this product
3. How to take this product
4. Possible side effects
5. How to store this product
6. Further information

#### 1. WHAT THIS PRODUCT IS AND WHAT IT IS USED FOR

This product contains Devil's Claw root extract. It is a traditional herbal medicinal product used for the relief of backache, rheumatic or muscular pain, and general aches and pains in the muscles and joints. This is based on traditional use only.

#### 2. BEFORE YOU TAKE THIS PRODUCT

Do not take this product if you:

- Are allergic to any of the ingredients (see section 6)
- Have ever had or have a **stomach ulcer** or **duodenal ulcer**
- Are **pregnant** or **breast-feeding**
- Are under the age of 18 years

Tell your doctor before taking this product if you:

- Have heart problems and want to take this product

Consult your doctor or qualified healthcare practitioner if:

- Your joint pain is accompanied by swelling of the joint, redness or fever
- Your symptoms worsen or do not improve after four weeks

#### Driving or operating machines:

In rare cases this product may cause dizziness and drowsiness. If this happens to you, do not drive or use machines.

#### 3. HOW TO TAKE THIS PRODUCT

For oral use only.

Adults and the elderly:

Take one dose in the morning and one dose in the evening. You can take the tablets with or without food. Swallow the tablets whole with some water or other liquid. Do not chew. **Do not exceed the stated dose.**

Please read this information carefully

before you start taking these tablets.

It contains some important information about this product. Keep this leaflet with the tablets. You may want to read it again or show it to your doctor, pharmacist or refer to a qualified healthcare practitioner.

#### If you take too much of this product (overdose)

If you take more than the recommended dose, speak to a doctor, pharmacist or qualified healthcare practitioner and take this leaflet with you.

#### If you forget to take this product

Continue to take your usual dose at the usual time, it does not matter if you have missed a dose.

#### After taking this product

You must speak to a doctor or a qualified healthcare practitioner if your symptoms worsen, if they do not improve after four weeks or if side effects not mentioned in this leaflet occur.

#### 4. POSSIBLE SIDE EFFECTS

Like all medicines, this product can have possible side effects. These are listed below:

- Digestive disorders - diarrhoea, feeling sick, being sick, abdominal pain
- Central nervous system disorders - headache, dizziness
- Skin disorders - allergic skin reactions such as rash and itching.

If any of the effects become troublesome or if you experience any other unexpected effects not listed in this leaflet, consult your doctor or pharmacist.

You must speak to a doctor or a qualified healthcare practitioner if your symptoms worsen, if they do not improve after four weeks, or if any of the side effects become serious, or if you notice any side effects not mentioned in the leaflet.

#### 5. HOW TO STORE THIS PRODUCT

Do not use your tablets after the expiry date which is stated on the box and blister pack.

  
ILDC0ML1

## 5. HOW TO STORE THIS PRODUCT (CONTINUED)

The expiry date refers to the last day of that month.  
Medicines should not be disposed of via waste water or household waste.

Return any out of date tablets to your pharmacist who will dispose of them.

Do not store above 25°C. Store in the original packaging. Keep the tablets out of sight and reach of children.

Keep your tablets in the packaging until it is time to take them.

## 6. FURTHER INFORMATION

### Active ingredient

Each film coated tablet contains 600mg of extract (as dry extract) from Devil's Claw root (*Harpagophytum procumbens* D.C. and/or *H.zeyheri* L.Decne, radix) (equivalent to 2100mg – 3000mg of Devil's Claw root).

### Extraction Solvent

Ethanol 60% V/V.

### Excipients in the extract

Maltodextrin, Silica Colloidal Anhydrous.

### Tablet Core

Maltodextrin, Microcrystalline Cellulose, Croscarmellose Sodium, Stearic Acid, Magnesium Stearate, Silica Colloidal Anhydrous.

### Tablet Coating

Hypromellose, Copper Chlorophyllin, Titanium Dioxide (E171), Glycerol

**The tablets are green coated and oval shaped.**

This product is available in 30, 60 and 90 tablets. Not all pack sizes are marketed.

If you would like further information about this product or for large print, Braille or audio version please contact:

**Traditional Herbal Registration Holder:**

**Vitabiotics Ltd, 1 Apsley Way, London NW2 7HF**

**Telephone: 020 8955 2662**

Manufacturer:

Thompson & Capper Ltd, Hardwick Road, Astmoor, Runcorn, Cheshire WA7 1PH.

Traditional Herbal Registration Number: THR 00387/0056

You can help make medicines safer by reporting any side effects to the Yellow Card Scheme at [www.mhra.gov.uk/yellowcard](http://www.mhra.gov.uk/yellowcard). Alternatively, you can get a paper Yellow Card form from your GP's surgery or pharmacy, or call free phone 0800 100 3352 (available 10am - 2pm Monday - Friday).

This leaflet was revised in August 2011



**LABELLING**

**Blister:**



**Carton:**

