Holland & Barrett Euphrasia Sinus Relief Capsules
GNC Live Well Euphrasia Sinus Relief Capsules
Lifecycle Euphrasia Sinus Relief Capsules
Nature’s Garden Euphrasia Sinus Relief Capsules
Nature’s Bounty Euphrasia Sinus Relief Capsules

THR 21710/0014

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NATURE’S GARDEN EUPHRASIA SINUS RELIEF CAPSULES
NATURE’S BOUNTY EUPHRASIA SINUS RELIEF CAPSULES

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LAY SUMMARY

The Medicines and Healthcare products Regulatory Agency (MHRA) granted NBTY Europe Limited a Traditional Herbal Registration Certificate for the traditional herbal medicinal products Holland & Barrett Euphrasia Sinus Relief Capsules, GNC Live Well Euphrasia Sinus Relief Capsules, Lifecycle Euphrasia Sinus Relief Capsules, Nature’s Garden Euphrasia Sinus Relief Capsules and Nature’s Bounty Euphrasia Sinus Relief Capsules (Traditional Herbal Registration number: THR 21710/0014) on 29 September 2014. These products are identical to each other apart from the difference in product name and will be collectively referred to as Euphrasia Sinus Relief Capsules in the remainder of this report. Euphrasia Sinus Relief Capsules are available without prescription and can be bought from pharmacies and other outlets.

The active ingredient in Euphrasia Sinus Relief Capsules comes from the herb of the Eyebright plant, which is also known as Euphrasia officinalis L. Euphrasia Sinus Relief Capsules is a traditional herbal medicinal product used for the relief of blocked sinuses and catarrh. This is based on traditional use only.

This registration is based exclusively upon the longstanding use of Eyebright herb 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.
HOLLAND & BARRET EUPHRASIA SINUS RELIEF CAPSULES
GNC LIVE WELL EUPHRASIA SINUS RELIEF CAPSULES
LIFECYCLE EUPHRASIA SINUS RELIEF CAPSULES
NATURE’S GARDEN EUPHRASIA SINUS RELIEF CAPSULES
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SCIENTIFIC DISCUSSION

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INTRODUCTION

The MHRA granted a Traditional Herbal Registration Certificate for the traditional herbal medicinal product Euphrasia Sinus Relief Capsules (THR 21710/0014) to NBTY Europe Limited on 29 September 2014. 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. Euphrasia Sinus Relief Capsules is a traditional herbal medicinal product used for the relief of blocked sinuses and catarrh, based on traditional use only.

There is sufficient evidence to demonstrate use of Eyebright herb for at least 30 years, of which at least 15 years have been in an EU Member State. A satisfactory review of the available safety data on Eyebright herb has also been provided, together with an Expert Safety Report supporting the proposed product.
PHARMACEUTICAL ASSESSMENT

HERBAL SUBSTANCE: EYEBRIGHT HERB

Scientific name of the plant: \textit{Euphrasia officinalis} L.
Plant family: Orobancheaceae

Manufacture of Herbal Substance
The herbal substance is collected from the wild in Europe. Collection is by hand or machine and takes place in spring, summer and autumn, when the plant is flowering. Following collection the herb is cleaned if necessary and dried naturally.

The supplier of the Eyebright herb has provided confirmation that the herbal substance is produced in accordance with the principles of Good Agricultural and Collection Practice (GACP) (EMEA/HMPC/246816/20050) and that the plant material is not treated with ethylene oxide or irradiation following harvesting.

Control of Herbal Substance
The herbal substance is controlled by a suitable specification.

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 current legislation relating to plastic materials and articles intended to come into contact with foodstuffs.

Stability of Herbal Substance
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 necessary 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: EYEBRIGHT HERB DRY EXTRACT

Extract solvent: Ethanol 75\% v/v
Drug extract ratio (native): 4-7:1

Manufacture of Herbal Preparation
A satisfactory description of the manufacturing process of the herbal preparation and flow diagram has been provided. The in-process controls are satisfactorily detailed. 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 specifications.

**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 current legislation relating to plastic materials and articles intended to come into contact with foodstuffs.

**Stability of Herbal Preparation**
Stability studies have been carried out under ICH conditions. The results support the proposed retest period of the herbal preparation.

**HERBAL PRODUCT: EUPHRASIA SINUS RELIEF CAPSULES**

**Description and Composition of Herbal Product**
Euphrasia Sinus Relief Capsules are two-piece, clear hard capsules with a brown powder fill. Each capsule contains 140mg of dry extract from Eyebright herb and the excipients maltodextrin and silica colloidal anhydrous (from the extract), microcrystalline cellulose, magnesium stearate and silica colloidal hydrated. The capsule shell is made of hypromellose.

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 monographs and representative Certificates of Analysis are provided to demonstrate full compliance with the Ph Eur.

The magnesium stearate used in the product is confirmed to be of vegetable origin.

**Manufacture of Herbal Product**
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 products and the method of manufacture. Currently, process validation has not been carried out on commercial batches, however, as the manufacturer 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 specifications are 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.
**Container Closure System**
The capsules are stored in green polyethylene terephthalate (PET) bottles with a chiffon green, polypropylene hinge cap with an inner seal liner designed to lift ‘n’ peel. The inner seal acts as a tamper evident seal under the cap and comprises of a polyester film, polymer adhesive layer, polyester tab, polyolefin foam, aluminium foil and sealable polyester film. The product is available in packs of 30 capsules.

Suitable specifications have been provided by the packaging suppliers and it has been confirmed that all primary packaging materials comply with Directive 2002/72/EC.

**Stability of Herbal Product**
Finished product stability studies have been conducted in accordance with current guidelines. Based on the results, a product shelf-life of 35 months is appropriate when the storage precautions ‘Do not store above 25° C’, ‘Keep in the original container’ and ‘Keep the bottle tightly closed’ are applied.

**Pharmaceutical Expert**
The Quality Overall Summary has been written by a chemist with suitable experience.

**Product Literature**
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**
There are no objections to granting of a Traditional Herbal Registration from a quality point of view.
NON-CLINICAL ASSESSMENT

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 Eyebright herb it is not possible to assess if the safety package for the phytochemical constituents of this active ingredient 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.

In view of the absence of results of genotoxicity testing, the applicant has provided assurance that results will be provided before the 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

INDICATIONS
The submitted the following therapeutic indications:

“A traditional herbal medicinal product used for the relief of blocked sinuses and catarrh. This is based on traditional use only.”

These indications are acceptable.

POSOLOGY AND METHOD OF ADMINISTRATION
The applicant has submitted the following:

“For oral use only
Adults and the elderly
Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Do not exceed the stated dose.
Duration of use:
If symptoms worsen, or do not improve after 7 days, a Doctor or a qualified Healthcare Practitioner should be consulted.”

This is acceptable.

EFFICACY
No clinical efficacy data is required for registration of Traditional Herbal Medicinal Products.

EVIDENCE OF TRADITIONAL USE
Article 16 c 1 (c) requires the applicant to provide bibliographic or expert evidence showing 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.

There is sufficient evidence to demonstrate use of Eyebright herb for at least 30 years, of which at least 15 years have been in an EU Member State. The requirements of the Directive are, therefore, addressed for this aspect.

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

A safety review has been provided as well as an Expert Safety Report written by a suitably qualified professional. These are satisfactory.

PRODUCT LITERATURE
The SmPC, PIL and labelling for this product are medically satisfactory.
CONCLUSION
There are no objections to granting of a Traditional Herbal Registration from a clinical point of view.
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 Traditional Herbal Medicinal Products.

There is sufficient evidence to demonstrate use of Eyebright herb for at least 30 years, of which at least 15 years have been in an EU Member State, and a satisfactory review of the safety data has been provided.

The SmPC, PILs and labelling are satisfactory.

BENEFIT-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.
The MHRA received the Traditional Herbal Registration application on 18 May 2012.

Following standard checks and communication with the applicant the MHRA considered the application valid on 25 July 2012.

Following assessment of the application the MHRA requested further information relating to the quality dossier on 10 October 2013 and the clinical dossier on 16 May 2014.

The applicant responded to the MHRA’s request, providing further information on the quality dossier on 13 June 2014 and the clinical dossier on 14 August 2014.

Following assessment of the response the MHRA requested further information relating to the quality dossier on 13 June 2014.

The applicant responded to the MHRA’s requests, providing further information on the quality and clinical dossiers on 14 August 2014.

A THR was granted on 29 September 2014.
SUMMARY OF PRODUCT CHARACTERISTICS

In accordance with Directive 2010/84/EU, the Summaries of Product Characteristics (SmPCs) for products granted Marketing Authorisations at a national level are available on the MHRA website.
PATIENT INFORMATION LEAFLETS

In accordance with Directive 2010/84/EU, the Patient Information Leaflets (PILs) for products granted Marketing Authorisations at a national level are available on the MHRA website.
Holland & Barrett Euphrasia Sinus Relief Capsules

Label:

Active Ingredients: Each hard capsule contains 140mg of extract (as dry extract) from Eyebright herb (Euphrasia officinalis L.) (equivalent to 850mg-980mg of Eyebright herb).

Dosage: For oral use only.
- Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a Doctor or a qualified Healthcare Practitioner should be consulted.

Warnings:
DO NOT EXCEED THE STATED DOSE
Do not take this product if you are:
- Under 18 years of age
- Pregnant or breastfeeding
- Allergic to Euphrasia or any of the ingredients in this product

Please read the enclosed leaflet carefully before using this product.


THR 21710/0014
Registration Holder: RBV Europe Limited, Shrubdown Road House, Basing Way, Nunton, Warminster, CV10 7RH, United Kingdom
GNC Live Well Euphrasia Sinus Relief Capsules

Label:

Active Ingredients: Each hard capsule contains 140mg of extract (as dry extract) from Eyebright herb (Euphrasia officinalis L.) equivalent to 560mg (385mg of Eyebright herb).

Extraction solvent: Ethanol 75% v/v.

Dosage: For oral use only.

Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a Doctor or a qualified Healthcare Practitioner should be consulted.

Warnings:
DO NOT EXCEED THE STATED DOSE
Do not take this product if you are:
- Under 18 years of age
- Pregnant or breastfeeding
- Allergic to Euphrasia or any of the ingredients in this product

Please read the enclosed leaflet carefully before using this product.

Storage: Do not store above 25°C.
Keep in the original packaging. Keep the bottle tightly closed. Keep out of sight and reach of children.

THR 21710/0014
Registration Holder: NBTY Europe Limited
Saxton Ryden House, Bletchingley Way, Nursted Centre,
Wanstead, E11 7RA, United Kingdom
Lifecycle Euphrasia Sinus Relief Capsules

Label:

Active Ingredients: Each hard capsule contains 140mg of extract (as dry extract) from Eyebright herb (Euphrasia officinalis L.) (equivalent to 500mg-980mg of Eyebright herb). Extraction solvent: Ethanol 75% v/v.

Dosage: For oral use only.
Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a Doctor or a qualified Healthcare Practitioner should be consulted.

Warnings: DO NOT EXCEED THE STATED DOSE
Do not take this product if you are:
- Under 18 years of age
- Pregnant or breastfeeding
- Allergic to Euphrasia or any of the ingredients in this product

Please read the enclosed leaflet carefully before using this product.


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30 Capsules
Carton:


Expiry Date - see below.

Warnings:
- Do not exceed the stated dose.
- Do not take this product if you are:
  - Under 18 years of age
  - Pregnant or breastfeeding
  - Allergic to Euphrasia or any of the ingredients in this product.
- Please read the enclosed leaflet carefully before using this product.

Active ingredients:
- Each hard capsule contains 14 mg of dried leafy plant of Euphrasia officinalis L. (Euphrasia officinalis L.) equivalent to 600 mg of Euphrasia herb. Extract diluent 75% v/v.

Dosage: For oral use only. Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a doctor or a qualified healthcare professional should be consulted.
Nature’s Garden Euphrasia Sinus Relief Capsules

Labels:

Active Ingredients: Each hard capsule contains 140mg of extract (as dry extract) from Eyebright herb (Euphrasia officinalis L.) (equivalent to 560mg-840mg of Eyebright herb). Extraction solvent: Ethanol 75% v/v.

Dosage: For oral use only. Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a Doctor or a qualified Healthcare Practitioner should be consulted.

Warnings:
DO NOT EXCEED THE STATED DOSE
Do not take this product if you are:
- Under 16 years of age
- Pregnant or breastfeeding
- Allergic to Euphrasia or any of the ingredients in this product

Please read the enclosed leaflet carefully before using this product.


THR 21710/0014
Registration Holder: NBTY Europe Limited, Samuel Ryder House, Beltring Way, Buntington, Warwickshire, CV10 7RH, United Kingdom
Nature’s Bounty Euphrasia Sinus Relief Capsules

Label:

Active Ingredients: Each capsule contains 140mg of extract (as dry extract) from Eyebright herb (Euphrasia officinalis L.) (equivalent to 560mg/98mg of Eyebright herb).

Dosage: For oral use only.

Adults and elderly: Take 1 capsule 3 times daily. Swallow the whole capsule with water.

Duration of use: If symptoms worsen, or do not improve after 7 days of taking this product, or if any side effects occur, a Doctor or a qualified Healthcare Practitioner should be consulted.

Warnings:
DO NOT EXCEED THE STATED DOSE
Do not take this product if you are:
- Under 18 years of age
- Pregnant or breastfeeding
- Allergic to Euphrasia or any of the ingredients in this product

Please read the enclosed leaflet carefully before using this product.


Regulation Holder: NBT Europe Limited,
Grand River House, Birling Way, Nantwich,
Warrington, CW5 8PN, United Kingdom

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