Hughes Health Red Peony Menopause Tincture

THR 42358/0001

UKPAR

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LAY SUMMARY

The Medicines and Healthcare products Regulatory Agency (MHRA) granted K Hughes & Co Limited a Traditional Herbal Registration Certificate for the traditional herbal medicinal product Hughes Health Red Peony Menopause Tincture (Traditional Herbal Registration number: THR 42358/0001) on 27 January 2015. This product is available without prescription and can be bought from pharmacies and other outlets.

The active ingredient of Hughes Health Red Peony Menopause Tincture comes from Red peony (*Paeonia lactiflora* Pallas) root. Hughes Health Red Peony Menopause Tincture is a traditional herbal medicinal product used for the symptomatic relief of hot flushes associated with the menopause, based on traditional use only.

This registration is based exclusively upon the longstanding use of Red peony 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.
HUGHES HEALTH RED PEONY MENOPAUSE TINCTURE

THR 42358/0001

SCIENTIFIC DISCUSSION

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INTRODUCTION

The MHRA granted a Traditional Herbal Registration Certificate for the traditional herbal medicinal product Hughes Health Red Peony Menopause Tincture (THR 42358/0001) to K Hughes & Co Limited on 27 January 2015. 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 symptomatic relief of hot flushes associated with the menopause, based on traditional use only.

The data supplied by the Applicant demonstrate 30 years of traditional use of Red peony, including at least 15 years of use in the European Community. A satisfactory review of the available safety data on Red peony has also been provided, together with an Expert Safety Report supporting the proposed product.
PHARMACEUTICAL ASSESSMENT

HERBAL SUBSTANCE: RED PEONY

Latin name: *Paeonia lactiflora* Pallas
Common name: Chinese peony, Common garden peony, Chi shao yao (Chinese)
Family: Paeoniaceae

The Red peony plants used in this product are sourced from the UK. The roots are collected in spring and autumn, removed from the rhizome and rootlet and dried in the sun (so far as the weather permits) followed by drying in a dedicated dehumidified atmosphere.

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 organic certification.

Control of Herbal Substance
An appropriate specification based on the BP monograph for White peony root is applied (with reference also made to the Chinese Pharmacopoeia) 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 2002/72/EC relating to plastic materials and articles intended to come into contact with foodstuffs.

Stability
No stability data have been provided and none are needed due to the short time between harvest and processing. Confirmation has been provided that if this storage period is exceeded the herbal substance will be tested immediately before use for compliance with the herbal substance specification.

HERBAL PREPARATION: RED PEONY ROOT TINCTURE

Parts of the plant used: Root
Ratio of the herbal substance to the herbal preparation (native): 1:3
Extraction solvent: Ethanol 25% v/v

The herbal preparation is an aqueous ethanolic (25% v/v) tincture of the dried herbal substance.

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.
There are no critical steps identified as 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.

**Container Closure System**
Confirmation is provided that all components of the container closure system used to store this 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 Red peony tincture is acceptable.

**HERBAL PRODUCT: HUGHES HEALTH RED PEONY MENOPAUSE TINCTURE**

**Description and Composition of the Herbal Product**
Hughes Health Red Peony Menopause Tincture is a brown liquid given as oral drops. Each 1 ml of the herbal product contains 1 ml of tincture from dried Red peony root (the herbal preparation). There are no excipients in this product. The ethanol in this product comes from the herbal preparation.

**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. Process validation has been carried out on product batches and the results are satisfactory.

**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.
Container Closure System
The herbal product is stored in an amber glass bottle fitted with a glass pipette, butyl-rubber bulb and HDPE plastic cap. The plastic cap has a tamper-evident collar that shears on first opening. The bottle size may be 50ml or 100ml.

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
Finished product stability studies have been conducted in accordance with current guidelines. Based on the results, a product shelf-life of 2 years is appropriate when the storage precaution ‘Do not store above 25° C’ is applied.

Pharmaceutical Expert
The Quality Overall Summary has been written by a biochemist, 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 Red peony 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

INDICATIONS
The applicant has submitted the following therapeutic indication:

“A traditional herbal medicinal product used for the symptomatic relief of hot flushes associated with the menopause, based on traditional use only.”

The indication is acceptable.

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

“For oral use only

Adult Females
For the symptomatic relief of hot flushes associated with the menopause: Take 20 drops (1 ml) in a small amount of water, three times a day. There is no relevant use in children and adolescents under 18 years of age.

If symptoms persist, worsen or do not improve during the use of the medicinal product, 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
Red peony root is generally accepted to have a tradition of use as an herbal medicine. 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 EU.

The applicant has provided a bibliographic review which shows evidence for the medicinal use of Red peony root for more than 30 years, including at least 15 years within the EU. Therefore, there is sufficient evidence of traditional use of this herbal preparation and a traditional herbal registration can be granted.

Safety Review
Article 16 c 1 (d) requires the applicant to provide a bibliography of the safety data together with an expert report.
The safety review has been provided, as well as an expert report written by a professional with relevant expertise. A CV has been included.
The applicant has provided satisfactory information supporting the safety of Red peony root.
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 (THMP).

The Applicant has provided a bibliographic review which shows evidence for the use of Red peony root for a period exceeding 30 years, including at least 15 years within the EU.

A satisfactory review of the safety data has been provided.

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.
HUGHES HEALTH RED PEONY MENOPAUSE TINCTURE

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STEPS TAKEN FOR ASSESSMENT

1. The MHRA received the Traditional Herbal Registration application on 18 December 2013.
2. Following standard checks and communication with the applicant the MHRA considered the application valid on 19 December 2013.
3. Following assessment of the application the MHRA requested further information relating to the quality dossier on 11 February 2014 and the clinical dossier on 12 February 2014.
4. The applicant responded to the MHRA’s requests, providing further information on the quality dossier on 7 September 2014 and the clinical dossier on 19 January 2015.
5. A THR was granted on 27 January 2015.
SUMMARY OF PRODUCT CHARACTERISTICS

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

In accordance with Directive 2010/84/EU, the Patient Information Leaflets (PILs) for products authorised at a national level are available on the MHRA website.
**LABELLING**

*Label*

**Ingredients:** Each 1 ml of oral liquid contains 1 ml of tincture from dried Red Peony (Paeonia lactiflora Pall.) root (1:3). Extraction solvent: Ethanol 25% v/v.

**Do not store above 25°C.**

**Traditional Herbal Registration Holder:**
K Hughes & Co Limited, 118 Trew Mount Road, Dungannon, County Tyrone, BT71 7EF.

**Traditional Herbal Registration Number:**
THR/4235/0071

**Manufactured by:** Rutland Biodynamics Ltd, Brooke, Rutland, LE15 8SG.

For further information about this product, contact:
hbalists@hughesmushrooms.com
Tel: 028 8778 4286

**Direction for use:** Adult females: Take 20 drops (1 ml) in a small amount of water, three times a day.

**Do not exceed the stated dose.**

Not for use in children or those under 18 or patients taking a medicine containing Phenytoin.

For oral use only. Please read the enclosed patient information leaflet before taking this product.

Keep out of reach and sight of children.

See expiry date on bottle.

**Caution:** Do not use if you are allergic to any of the ingredients.

This product contains ethanol. Harmful for people suffering from alcoholism. See leaflet for further information.

If symptoms persist or worsen or adverse reaction not mentioned in the leaflet occur, consult a doctor or qualified healthcare practitioner.
INGREDIENTS
Each 1 ml of oral liquid contains
100 ml

DIRECTIONS FOR USE:
Adult females:
Take 20 drops (1 ml) in a
small amount of water
three times a day.

CAUTION:
Do not use if you are pregnant,
breastfeeding or allergic to any
of the ingredients.

This product contains ethanol
alcohol. Harmful for people
suffering from alcoholism.
If affected by the alcohol, do
not drive or operate machines.

A traditional herbal medicinal
product used for the
symptomatic relief of hot
flushes associated with
the menopause based on
traditional use only.

Manufactured in UK.