

15 June 2007

Dear Sir/Madam

CONSULTATION DOCUMENT: ARM 42

REQUEST TO RECLASSIFY A PRODUCT FROM P TO GSL

Consultation ARM 42 seeks your views on the reclassification from P to GSL of Imodium Capsules and Imodium Instants. The Reclassification Summary and Patient Information Leaflet as provided by the applicant company are displayed below.

Comments should be sent either by post to Veronica Popo in room 14-138, Market Towers, 1 Nine Elms Lane, London, SW8 5NQ or by email (veronica.popo@mhra.gsi.gov.uk) to arrive by **13 July 2007**. Contributions received after that date cannot be included in the exercise.

Please inform us of your email address if you wish to receive an electronic copy of all future consultations via email.

To help informed debate on the issues raised by this consultation exercise, and within the terms of the Freedom of Information Act, the Agency intends to make copies of comments received publicly available. Unless you state otherwise we will assume that you have no objections to your comments being publicly available on the Agency's website.

Yours faithfully

Veronica Popo
Reclassification Unit

To: Veronica Popo
Department of Health
MHRA
Room 14-138 Market Towers
1 Nine Elms Lane
LONDON SW8 5NQ

From: _____

CONSULTATION LETTER ARM 42: IMODIUM CAPSULES AND IMODIUM INSTANTS

Request to Reclassify a Product from P to GSL

- * 1. We have no comments to make on the proposals in ARM 42
- * 2. Our comments on the proposals in ARM 42 are below/attached.
 - *Our reply may be made freely available
 - *Our reply is confidential
 - *Our reply is partially confidential (indicate clearly in the text any confidential elements)

Signed: _____
*Delete as appropriate

Date: _____

ARM 42

CONSULTATION PERIOD 15 JUNE TO 13 JULY 2007

RECLASSIFICATION SUMMARY FOR P TO GSL APPLICATION ON
IMODIUM CAPSULES

1. APPLICANT DETAILS

McNeil Ltd

2. PRODUCT DETAILS

Product Names and MA Numbers:

PL 00242/0028: IMODIUM Capsules

PL 13249/0031: IMODIUM Instants

Active Ingredient:

Loperamide 2mg per dosage form.

Indication:

Imodium Capsules are licensed as POM, P and GSL packs. The P product is indicated for the symptomatic treatment of acute episodes of diarrhoea associated with Irritable Bowel Syndrome (IBS) in adults following initial diagnosis by a doctor. The P and GSL products are both indicated '*for the symptomatic treatment of acute diarrhoea in adults and children aged 12 years and over*'.

Imodium Instants are a GSL product which are indicated '*for the symptomatic treatment of acute diarrhoea*'.

It is proposed that the indication '*for the symptomatic treatment of acute episodes of diarrhoea associated with IBS in adults aged 18 years and over following initial diagnosis by a doctor*' be added to both licences.

Dosage including age limits and restrictions on length of treatment:

The recommended dose will be:

Acute diarrhoea: 2 dosage forms initially followed by 1 dosage form after every loose stool. The usual dose is 3-4 dosage forms/day; the maximum daily dose should not exceed 6 dosage forms.

Symptomatic treatment of acute episodes of diarrhoea associated with irritable bowel syndrome in adults: 2 dosage forms to be taken initially. The usual dose is between 2 and 4

dosage forms per day in divided doses depending on severity. If required, this dose can be adjusted according to result, up to a maximum of 6 dosage forms daily.

The maximum pack size will be 6 dosage forms, equivalent to one day's treatment if the maximum dose is taken.

If symptoms persist for more than 24 hours, people will be advised to consult their doctor.

3. RATIONALE FOR THE RECLASSIFICATION

Imodium, containing loperamide hydrochloride 2mg per dosage form, has been available for 30 years in the UK. It has been reclassified as a P medicine in the UK in 1985 and reclassified as a GSL medicine in 1997. The products which are the subject of this reclassification are already available as GSL medicines for the symptomatic treatment of acute diarrhoea. Loperamide is currently available as a P medicine for the symptomatic treatment of acute episodes of diarrhoea associated with IBS. Support for making Imodium available for this indication as a GSL medicine is presented below.

3.1 Hazard to Health:

Loperamide hydrochloride is a synthetic opioid anti-diarrhoeal agent that binds to the opiate receptor in the gut wall. Due to its high affinity for the gut wall and its high first-pass metabolism, loperamide levels in the systemic circulation remain extremely low. Therefore, the potential for causing serious side effects is small.

Loperamide hydrochloride has a good safety profile with few side effects reported during clinical investigations or in use as a POM, P or GSL medicine.

Most adverse events are mild self-limiting events. Review of the PSUR, Drug Analysis Prints (DAPs) for loperamide and Product Analysis Prints (PAPs) for Imodium do not reveal any particular areas of concern.

3.2 Risk of misuse

Symptomatic relief of Irritable Bowel Syndrome is established as an indication suitable for products with GSL status. However, this product is only to be indicated for the symptomatic treatment of acute episodes of diarrhoea associated with Irritable Bowel Syndrome in adults previously diagnosed by a doctor.

It is clearly stated on the carton that a doctor has to have diagnosed IBS before self-medicating with Imodium.

The greatest potential concern is that individuals may take loperamide to treat diarrhoea that they believe to be related to IBS, when it is, in fact, the result of a serious underlying condition such as a malignancy, bacterial enterocolitis or acute dysentery. As with other GSL medicines recommended for IBS related conditions, advice will be given to consult a doctor before self-medication for those experiencing digestive symptoms of unknown cause.

Individuals will not continue to self medicate unnecessarily. There is no evidence to suggest that individuals unnecessarily take antidiarrhoeal products.

In the unlikely event that an individual makes an inappropriate decision to take the medicine, it is likely that this will be for a short period of time as the pack advises people to seek medical advice after 24 hours if symptoms persist for acute diarrhoea or 2 weeks in the case of diarrhoea associated with IBS that has been previously diagnosed by a doctor.

3.3 Role of the Pharmacist

Once diagnosed by a doctor, IBS sufferers are usually familiar with their symptoms and are able to self medicate during acute episodes. The PIL will include clear information which will help to ensure the correct use of the product without the supervision of a pharmacist.

3.4 Special precautions in handling

There are no special precautions for handling these products.

3.5 Convenience to the purchaser

IBS is a common condition and consumers want to be able to treat their symptoms promptly and effectively. This condition can be troublesome and life affecting and individuals benefit from prompt treatment of symptoms. Individuals are more likely to return to work if the symptoms are under control.

The reclassification of this product would widen accessibility to treatment for consumers with IBS previously diagnosed by a doctor.

This reclassification encourages self-care, lessens reliance on health professionals and allows more choice for sufferers in how they treat this chronic intermittent condition.

4. Support for reclassification

This is a company application and no special additional support from experts or organisations has been provided.

5. Specific GSL Requirements

- The maximum pack size will be 6 dosage forms.

- Previous Committee on Safety of Medicines (now the Commission on Human Medicines) recommendations relating to OTC medicines for use in IBS, advising when it is necessary to consult a doctor prior to or during treatment have been included in the product information.
- A warning for IBS sufferers to seek medical advice if new symptoms develop or worsen or if symptoms do not improve over two weeks has been included in the product information.

6. Safety Profile

Imodium, containing loperamide hydrochloride 2mg per dosage form, has been available for 30 years in the UK. It has been reclassified as a P medicine in the UK in 1985 and reclassified as a GSL medicine in 1997.

Loperamide has a well established safety record over the 10 years that it has been available as a P medicine for the symptomatic treatment of acute episodes of diarrhoea associated with IBS in adults previously diagnosed by a doctor. Post-marketing experience has shown that the availability of loperamide through pharmacies for this indication and through general sales outlets for the symptomatic treatment of acute diarrhoea is safe.

© J-C [Year]

Imodium Capsules ^{TRADEMARK}

Loperamide hydrochloride

PATIENT INFORMATION LEAFLET

WHAT SHOULD YOU KNOW ABOUT IMODIUM?

Before you start to take your medicine, please read this leaflet carefully all the way through as it contains important information. If there is anything that you do not understand or if you need further information or advice, you should ask your pharmacist or doctor.

This leaflet applies only to Imodium capsules. **Please do not throw it away as you may need to refer to it again.**

WHAT IS IMODIUM?

The active ingredient of Imodium is loperamide hydrochloride, a medicine used to treat diarrhoea.

Imodium is available for general sale in packs of 6

Imodium capsules come in the form of green/grey capsules marked 'Imodium' and 'JANSSEN'. Each capsule contains 2 mg loperamide hydrochloride. The capsules also contain the following inactive ingredients: lactose, maize starch, talc and magnesium stearate. The capsule itself is made up of titanium dioxide (E171), iron oxides (E172), indigo carmine (E132), erythrosine (E127) and gelatin.

The product licence for this medicine (PL number 0242/0028), is held by Janssen-Cilag Ltd, Saunderton, High Wycombe, Bucks, HP14 4HJ, UK. Imodium capsules are manufactured by either Janssen Pharmaceutica NV, Turnhoutseweg 30, B2340, Beerse, Belgium, Janssen-Cilag SA, Campus de Maigremont, 27100 Val de Reuil, France or Pharmapac UK Ltd, Bidston, Wirral, CH41 7EL.

WHAT IS IMODIUM FOR?

Imodium is used to treat sudden short-lived (acute) attacks of diarrhoea in adults and children over 12 years old.

Imodium can also be used to treat episodes of diarrhoea associated with Irritable Bowel Syndrome in adults aged 18 years and over after your doctor has diagnosed you are suffering from this condition.

Diarrhoea happens because your bowel is contracting faster than normal. Imodium works by slowing down your bowel and returning it to its normal rhythm. As a result, this helps to

restore the absorption of more fluids and nutrients back into your body. This makes your stools more solid and less frequent.

WHAT YOU SHOULD KNOW BEFORE YOU TAKE IMODIUM

BEFORE TAKING ANY MEDICINE

Always inform your doctor or pharmacist if you are pregnant, think you might be pregnant or are trying to become pregnant as they will be able to tell you the best thing to do.

WHEN NOT TO USE THIS MEDICINE

Do not take Imodium if:

- You are a child under the age of 12.
- Your doctor has told you that you have a condition where slowing of the stomach or intestine should be avoided for example, a bloated tummy - particularly in children with severe dehydration or AIDS patients- constipation, any form of blockage of the bowel, or any form of inflammation or irritation of the bowel such as colitis, diverticulosis)
- You think that you may have had an allergic reaction to any form of Imodium or any of the inactive ingredients. An allergic reaction may include a rash, itching, swollen face or lips, or shortness of breath.
- You have acute dysentery. The symptoms of dysentery may include blood in your stools and a high temperature.

If you are not sure about any of the above, ask your doctor or pharmacist.

If you have Irritable Bowel Syndrome (IBS):

Only take Imodium to treat acute episodes of diarrhoea associated with Irritable Bowel Syndrome if your doctor has previously diagnosed IBS.

If any of the following now apply, do not use the product without first consulting your doctor, even if you know you have IBS:

- If you are 40 years or over and it is some time since your last attack of IBS or the symptoms are different this time
- If you have recently passed blood from the bowel
- If you suffer from severe constipation
- If you are feeling sick or vomiting
- If you have lost your appetite or lost weight
- If you have difficulty or pain passing urine
- If you have a fever
- If you have recently travelled abroad

Consult your doctor if you develop new symptoms, or if your symptoms worsen or have not improved over two weeks.

WHAT SPECIAL PRECAUTIONS SHOULD BE TAKEN WHEN USING THIS MEDICINE?

If you suffer from liver disease, see your doctor before taking any Imodium. You may need to be closely supervised during treatment and the dosage may have to be altered.

Imodium only treats the symptoms of diarrhea. When you have diarrhoea, your body loses large amounts of fluid and salts, and it is necessary to replace this lost fluid by taking more liquids than you normally would. This is of particular importance in young children, the frail and elderly, A special powder containing sugar and salts (known as oral rehydration therapy) may be needed to help the body replace the fluid and salts lost during diarrhoea. Ask a pharmacist for advice.

In cases of acute diarrhoea, if your diarrhoea lasts for more than 24 hours, see your doctor.

If you are taking Imodium to control episodes of diarrhoea associated with Irritable Bowel Syndrome previously diagnosed by your doctor, you should return to him/her if the pattern of your symptoms changes. Also, if your diarrhoea symptoms persist for more than two weeks, such that there is a need for continuous treatment during this time, then you should consult your doctor.

Pregnancy

If you are pregnant, think you might be pregnant or are planning to become pregnant, you should talk to your doctor who will decide if you can take Imodium.

Breast Feeding

Do not take Imodium if you are breast feeding as small amounts of the medicine may get into your milk. You should talk to your doctor about suitable treatment.

Other Medicines

Always tell your doctor or pharmacist if you are unsure about taking any other medicines as you should not take any other antidiarrhoeal preparations whilst taking Imodium (except for oral rehydration therapy).

Driving or operating machinery



Use caution when driving or operating machinery if you feel dizzy, tired or sleepy after taking Imodium.

HOW TO USE YOUR MEDICINE

Swallow the correct number of capsules whole with some liquid.

WHAT IS THE DOSE FOR IMODIUM?

To treat sudden short-lived (acute) diarrhoea:

Adults and children aged 12 and over: take two capsules to begin with and then, if required, 1 capsule after each episode of diarrhoea. Do not take more than 6 capsules in any 24 hour period.

To treat episodes of diarrhoea associated with Irritable Bowel Syndrome:

If you know you suffer from Irritable Bowel Syndrome, take two capsules to control an episode of diarrhoea. Further episodes may be controlled by taking 1 or 2 capsules according to severity, up to a maximum of 6 capsules a day.

If your symptoms change or if your acute symptoms persist for more than 2 weeks, consult your doctor.

Ask your pharmacist if you are not sure about anything.

WHAT IF TOO MUCH HAS BEEN TAKEN?

If you or anyone else, take too much Imodium, contact your doctor or local hospital without delay.

DOES THIS MEDICINE HAVE ANY UNWANTED SIDE EFFECTS?

Like all medicines, Imodium can occasionally cause side effects.

It is very rare to experience the following symptoms after taking Imodium; tummy cramps, feeling sick, vomiting, indigestion, tiredness, drowsiness, dizziness, dry mouth and skin reactions, including nettlerash.

Allergic reactions to Imodium are very rare. An allergic reaction can be recognised, for instance, by skin rash, itching, shortness of breath or swollen face. If any of these signs occurs, stop taking Imodium and see your doctor.

Severe bloated tummy or stoppage of bowel activity or difficulty urinating (passing water) have been reported. If this should occur, stop taking Imodium and contact your doctor.

If your medicine affects you in any other way, you should tell your doctor or pharmacist.

HOW SHOULD THIS MEDICINE BE STORED?

As with all medicines, Imodium should be kept in a safe place where children cannot see or reach it. Store the medicine in its original container. Do not use the medicine after the expiry date printed on the packaging and return any left over medicine to your pharmacist.

This leaflet was revised in March 2007.

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CONSULTATION LIST: ARM 42

Advertising Association
Advertising Standards Authority
Advisory Committee on Misuse of Drugs
Aqueous II (NHS Information Authority)
Arthritis Care
Association of Anaesthetists of GB and Ireland
Association of British Cardiac Nurses
Association of British Pharmaceutical Industry
Association of Independent Multiple Pharmacies
Association of Pharmaceutical Importers
Asthma and Allergy Research
Astra Zeneca
Bayer Plc
BDA Scotland
Boots Pharmacists Association
British Association of European Pharmaceutical Distributor
British Association of Pharmaceutical Wholesalers
British Association of Dermatologists
British Association of Pharmaceutical Physicians
British Cardiac Patients Association
British Dental Association
British Dental Association (NI)
British Dental Association (Wales)
British Diabetic Association
British Generic Manufacturers Association
British Geriatric Society
British Heart Foundation
British Homeopathic Association
British International Doctors Association
British Institute of Regulatory Affairs
British Medical Association
British Medical Association (Wales)
British Pharmacological Society (London)
British Retail Consortium
British Society for Allergy & Clinical Immunology
British Society of Gastroenterology
British Society of Rheumatology
British Toxicology Society
Cancer BACUP
Central Medical Advisory Committee
College of Pharmacy Practice
Committee for Practitioners
Community Pharmacy Magazine
Company Chemists Association

Connect Public Affairs
Consolidated Communications
Consumers Association
CMP Medica
Department of Agriculture
Department of Health, UK
Department of Health, Social Services and Public Safety, Northern Ireland
Diabetes UK
Dispensing Doctors Association
Doctor magazine
Drug Information Pharmacists Group
Faculty of Pharmaceutical Medicine
Faculty of Public Health
FDC Reports
Francesco International
General Medical Council
General Practitioners Association (NI)
General Practitioners Committee
General Practitioners Committee (Wales)
Guild of Healthcare Pharmacists
Health Protection Agency
Health Service Commissioner
Help the Aged
IBS Network
Imperial Cancer Research Fund
Independent Healthcare Forum
International Research Consultants
LUTO Rearch Limited
LACOTS
Long term Medical Conditions Alliance
Medical Defence Union
Medical Protection Society Ltd
Medical Research Council
Medical Women's Federation
National AIDS Trust
National Association of Women Pharmacists
National Back pain Association
National Consumer Council
National Federation of retail Newsagents
National Patient Safety Agency
National Pharmaceutical Association
National Public Health Service (NPHS)(Wales)
Neurological Alliance
NHS Direct
Northern Ireland Consumer Council
Nursing and Midwifery Council

Ophthalmic Group Committee
OTC Bulletin
Patients Association
PCT Healthcare
Pharmaceutical Journal
Pharmacist's Defence Association
Pharmaceutical Society of NI
Primary Care Society for Gastroenterology
Proctor & Gamble UK
Proprietary Association of Great Britain
Pharmaceutical Services Negotiating Committee
Royal College of General Practitioners
Royal College of Nursing
Royal College of Nursing (NI)
Royal College of Paediatrics & Child Health
Royal College of Pathologists
Royal College of Physicians (London)
Royal College of Physicians and Surgeons of Glasgow
Royal College of Physicians of Edinburgh
Royal College of Psychiatrists
Royal College of Radiologists
Royal College of Surgeons (Edinburgh)
Royal College of Surgeons (England)
Royal Pharmaceutical Society of Great Britain
Royal Pharmaceutical Society (Wales)
Royal Society for the Promotion of Health
SACAR
Scottish Executive
Scottish General Practitioners Committee
Scottish Pharmaceutical General Council (SPGC)
Scottish Wholesale Druggists Association
Social Audit Unit
Society of Pharmaceutical Medicine
Surgical Dressings Manufacturers Association
Thornton and Ross
Terrence Higgins Trust
Tutssels Enterprise IG
UK Clinical Pharmacy Association (UKCPA)
UK Homeopathic Medical Association
UK Inter-professional Group
Veterinary Medicines Directorate (VMD)
West Lancashire PCT
Women in medicine
Wyeth

