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Nov 17, 2017

Submission of comments on 'Guideline on non-clinical documentation for marketing authorisation/registration of well-established and traditional herbal medicinal products' (EMEA/HMPC/32116/2005 Rev. 1) Draft

Comments from:

Name of organisation or individual
ECHAMP

Please note that these comments and the identity of the sender will be published unless a specific justified objection is received.

When completed, this form should be sent to the European Medicines Agency electronically, in Word format (not PDF).

30 Churchill Place ● Canary Wharf ● London E14 5EU ● United Kingdom
Telephone +44 (0)20 3660 6000 **Facsimile** +44 (0)20 3660 5555
Send a question via our website www.ema.europa.eu/contact

1. General comments

Stakeholder number *(To be completed by the Agency)*	General comment (if any)	Outcome (if applicable) *(To be completed by the Agency)*
	No general comments	

2. Specific comments on text

Line number(s) of the relevant text *(e.g. Lines 20-23)*	Stakeholder number *(To be completed by the Agency)*	Comment and rationale; proposed changes *(If changes to the wording are suggested, they should be highlighted using 'track changes')*	Outcome *(To be completed by the Agency)*
Line 49	ECHAMP	**Comment:** The avoidance of unnecessary tests in animals is an important concern for us. In chapter **1. Introduction** line 49 is stated that "post-marketing experience gained by wide spread use in humans may contribute to the avoidance of unnecessary tests in animals" Operating a pharmacovigilance-system is mandatory for medicinal products affected by this guideline. It can therefore be assumed that the insights derived from this system are meaningful and should be used. Pharmacovigilance data, collected from several sources (spontaneous reporting, literature, studies etc.) is valuable post-marketing experience gained by wide spread use in humans and thus, should be accepted by the authorities as post-marketing experience data to contribute to the avoidance of unnecessary tests in animals. Therefore, these data should be explicitly mentioned in this guidance document. **Proposed change:** Please include explicitly pharmacovigilance data: "[…] post-marketing experience **(e.g. pharmacovigilance data of several years)** gained by wide spread use in humans	

Line number(s) of the relevant text *(e.g. Lines 20-23)*	Stakeholder number *(To be completed by the Agency)*	Comment and rationale; proposed changes *(If changes to the wording are suggested, they should be highlighted using 'track changes')*	Outcome *(To be completed by the Agency)*
		may contribute to the avoidance of unnecessary tests in animals […].”	
Lines 118 ff.	ECHAMP	**Comment:** In chapter **4.1 General aspects** lines 118 ff. is mentioned that if “sufficient and well-documented experience” is “available in humans, testing of single dose and repeated dose toxicity, toxicokinetic studies, immunotoxicity as well as local tolerance … is not necessary” , especially if there are no safety concerns. The need for a pharmacovigilance system with the collection and evaluation of individual case safety reports (ICSR) and tools like e.g. signal detection have been introduced to detect such safety concerns. Due to the fact that problems with e.g. single dose and repeated dose toxicity or local tolerance can be detected well by a pharmacovigilance system, this data should be accepted by the authorities as “sufficient and well-documented experience” in case the product in question is on the market since many years and product specific pharmacovigilance data exist. If no safety concerns arise from the pharmacovigilance system concerning the above mentioned tests, these tests are not necessary and do not have to be conducted. **Proposed change:**	

Line number(s) of the relevant text *(e.g. Lines 20-23)*	Stakeholder number *(To be completed by the Agency)*	Comment and rationale; proposed changes *(If changes to the wording are suggested, they should be highlighted using 'track changes')*	Outcome *(To be completed by the Agency)*
		Please include explicitly pharmacovigilance data: "Where there is,[…], sufficient and well-documented experience available in humans **(e.g. pharmacovigilance data of several years)**, testing of single dose and repeated dose toxicity, toxicokinetic studies, immunotoxicity as well as local tolerance … is not necessary."	
128-129	ECHAMP	**Comment:** In chapter **4.1 General aspects** line 128-129 the following is stated: "In general, the documented experience gathered during the long-standing use will be the main basis of the non-clinical assessment […]." **Proposed change:** Please include explicitly pharmacovigilance data: "In general, the documented experience gathered during the long-standing use **(e.g. pharmacovigilance data of several years)** will be the main basis of the non-clinical assessment […]."	

Please add more rows if needed.