

PUBLIC ASSESSMENT REPORT of the Medicines Evaluation Board in the Netherlands

Ibuprofen Liquid caps 200 mg PCH, capsule, soft Pharmachemie B.V., the Netherlands Ibuprofen Liquid caps 400 mg Teva, capsule, soft Teva Nederland B.V., the Netherlands

ibuprofen

This assessment report is published by the MEB pursuant Article 21 (3) and (4) of Directive 2001/83/EC. The report comments on the registration dossier that was submitted to the MEB.

It reflects the scientific conclusion reached by the MEB at the end of the evaluation process and provides a summary of the grounds for approval of a marketing authorisation.

This report is intended for all those involved with the safe and proper use of the medicinal product, i.e. healthcare professionals, patients and their family and carers. Some knowledge of medicines and diseases is expected of the latter category as the language in this report may be difficult for laymen to understand.

This assessment report shall be updated by a following addendum whenever new information becomes available.

General information on the Public Assessment Reports can be found on the website of the MEB.

To the best of the MEB's knowledge, this report does not contain any information that should not have been made available to the public. The MAH has checked this report for the absence of any confidential information.

Registration number in the Netherlands: RVG 106047, 106049

18 December 2012

Pharmacotherapeutic group: antiinflammatory and antirheumatic products, non-steroids,

propionic acid derivatives

ATC code: M01AE01

Route of administration: oral

Therapeutic indication: headache, fever and pain due to common cold or influenza,

dental pain, pain during menstrual bleeding, muscular pain, backache, rheumatic pain, fever and pain following vaccination,

migraine (with or without aura)

Prescription status: non prescription

Date of authorisation in NL: 30 May 2011 (400 mg), 30 July 2012 (200 mg)

Application type/legal basis: Directive 2001/83/EC, Article 10(1)

For product information for healthcare professionals and users, including information on pack sizes and presentations, see Summary of Product Characteristics (SPC), package leaflet and labelling.

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I INTRODUCTION

Based on the review of the quality, safety and efficacy data, the Medicines Evaluation Board of the Netherlands (MEB) has granted a marketing authorisation for Ibuprofen Liquid caps 200 mg PCH, capsule, soft from Pharmachemie B.V. and Ibuprofen Liquid caps 400 mg Teva, capsule, soft from Teva Nederland B.V. The date of authorisation in the Netherlands was on 30 May 2011 for the 400 mg product and 30 July 2012 for the 200 mg capsules.

The products are indicated for

- headache
- fever and pain due to common cold or influenza
- dental pain
- · pain during menstrual bleeding
- muscular pain
- backache
- rheumatic pain
- fever and pain following vaccination
- migraine (with or without aura) only for the 400 mg capsules

A comprehensive description of the indications and posology is given in the SPC.

Ibuprofen is a propionic acid derivative NSAID that has demonstrated its efficacy by inhibition of prostaglandin synthesis. In humans ibuprofen reduces inflammatory pain, swellings and fever. Furthermore, ibuprofen reversibly inhibits platelet aggregation.

Experimental data suggest that ibuprofen may inhibit the effect of low dose aspirin on platelet aggregation when they are dosed concomitantly. In one study, when a single dose of ibuprofen 400mg was taken within 8 h before or within 30 min after immediate release aspirin dosing (81mg), a decreased effect of ASA on the formation of thromboxane or platelet aggregation occurred. However, the limitations of these data and the uncertainties regarding extrapolation of ex vivo data to the clinical situation imply that no firm conclusions can be made for regular ibuprofen use, and no clinically relevant effect is considered to be likely for occasional use.

This national procedure concerns a generic application claiming essential similarity with the innovator products Brufen® 200 mg and 400 mg capsules (NL License RVG 25572, 28320) which were first registered in the Netherlands by Knoll in 1969 and 1975, respectively (original product). These products are now registered as Advil Liquid-Caps 200 and 400, soft capsules, with Pfizer B.V. as marketing authorisation holder.

The marketing authorisation is granted based on article 10(1) of Directive 2001/83/EC.

This type of application refers to information that is contained in the pharmacological-toxicological and clinical part of the dossier of the authorisation of the reference product. A reference product is a medicinal product authorised and marketed on the basis of a full dossier, i.e. including chemical, biological, pharmaceutical, pharmacological-toxicological and clinical data. This information is not fully available in the public domain. Authorisations for generic products are therefore linked to the 'original' authorised medicinal product, which is legally allowed once the data protection time of the dossier of the reference product has expired. For this kind of application, it has to be demonstrated that the pharmacokinetic profile of the product is similar to the pharmacokinetic profile of the reference product. To this end the MAH has submitted two bioequivalence study in which the pharmacokinetic profile of the product is compared with the pharmacokinetic profile of the reference products Advil Liquid-Caps 200 and 400 mg, registered in the Netherlands. A bioequivalence study is the widely accepted means of demonstrating that difference of use of different excipients and different methods of manufacture have no influence on efficacy and safety. This generic product can be used instead of its reference product.

No new pre-clinical and clinical studies were conducted, which is acceptable for this abridged application.

No scientific advice has been given to the MAH with respect to these products and no paediatric development programme has been submitted, as this is not required for a generic application.

II SCIENTIFIC OVERVIEW AND DISCUSSION

II.1 Quality aspects

Compliance with Good Manufacturing Practice

The MEB has been assured that acceptable standards of GMP (see Directive 2003/94/EC) are in place for this product type at all sites responsible for the manufacturing of the active substance as well as for the manufacturing and assembly of this product prior to granting its national authorisation.

Active substance

The active substance ibuprofen sodium is not described in the European Pharmacopoeia (Ph.Eur.*). Ibuprofen is practically insoluble in water, very soluble in alcohol, in acetone, in methanol and in chloroform and slightly soluble in ethyl acetate. Ibuprofen is a racemic mixture of two isomers.

The CEP procedure is used for the active substance. Under the official Certification Procedures of the EDQM of the Council of Europe, manufacturers or suppliers of substances for pharmaceutical use can apply for a certificate of suitability concerning the control of the chemical purity and microbiological quality of their substance according to the corresponding specific monograph, or the evaluation of reduction of Transmissible Spongiform Encephalopathy (TSE) risk, according to the general monograph, or both. This procedure is meant to ensure that the quality of substances is guaranteed and that these substances comply with the European Pharmacopoeia.

Manufacturing process

A CEP has been submitted; therefore no details on the manufacturing process have been included.

Quality control of drug substance

The drug substance specification is in line with the Ph.Eur. and the CEP. The specification is acceptable in view of the route of synthesis and the various European guidelines. Batch analytical data demonstrating compliance with the drug substance specification have been provided for one full scaled batch. Given the fact that a CEP is available, this is considered acceptable.

Stability of drug substance

The active substance is stable for 5 years when stored under the stated conditions. Assessment thereof was part of granting the CEP and has been granted by the EDQM.

* Ph.Eur. is an official handbook (pharmacopoeia) in which methods of analysis with specifications for substances are laid down by the authorities of the EU.

Medicinal Product

Composition

Ibuprofen Liquid caps 200 mg PCH are green coloured, oval shaped soft gelatin capsules, containing colourless to light green coloured, transparent, viscous liquid, printed "145" in black colour on the capsule shell.

Iboprofen Liquid caps 400 mg Teva are clear oval shaped soft gelatin capsules containing colourless to pale yellow coloured, transparent, viscous liquid, printed '125' in black colour on the capsule shell.

The capsules are packed in PVdC-Aluminium blisters or PVC-Aluminium blisters.

The excipients for the 200 mg strength are polyethylene glycol 400, sorbitol, sorbitan monooleate, potassium hydroxide and purified water.

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The excipients for the 400 mg strength are polyethylene glycol 400, sorbitan monooleate, potassium hydroxide, povidone K-30 and purified water.

The capsule shell consists of gelatin, polyethylene glycol 400, sorbitol, purified water, triglycerides and Green S (E142) (200 mg only).

The two capsules are not dose proportional.

Pharmaceutical development

The development of the product has been described, the choice of excipients is justified and their functions explained. For both strengths an initial formulation was tested against the innovator. During the development the composition and process parameters were optimised several times until the final manufacturing formula and method were obtained.

The composition of the batches used in the bioequivalence studies is identical to the proposed composition and the optimised manufacturing process as described in the dossier was used. Comparative dissolution data versus the innovator have been provided. The pharmaceutical development of the product has been adequately performed.

Manufacturing process

The various steps of the manufacturing process have been described in sufficient detail. The manufacturing process is seen as a standard process. The process has been adequately validated according to relevant European guidelines. Process validation data on the product has been presented for two pilot-scale batches for the 200 mg strength and three pilot-scale batches for the 400 mg strength. Process validation for full scaled batches will be performed post authorisation.

Control of excipients

The excipients comply with the Ph.Eur. and the specifications are acceptable. A non-compendial excipient is the pharmaceutical ink, for which an appropriate specification is presented. Initially, the colourant FD&C Green No.3 was included in the capsule shell for the 200 mg product. This excipient is not mentioned in the EU regulations. A concern was therefore raised. The MAH replaced the colourant with Green S (E142), which is mentioned in Directive 2008/128/EC and therefore acceptable.

Quality control of drug product

The product specification includes tests for appearance, identification, uniformity of dosage units, loss on drying, dissolution rate, assay, related substances, residual solvent and microbiological purity. With the exception of the specification for the assay for the 400 mg capsules, the release and end of shelf-life specifications are identical. The specifications are acceptable. The analytical methods have been adequately described and validated.

Batch analytical data from the proposed production site have been provided for one batch of 200 mg ibuprofen and for three batches of 400 mg ibuprofen, demonstrating compliance with the release specification.

Stability of drug product

For the 200 mg capsules stability data on the product have been provided for two pilot-scale batches stored at 25°C/60%RH (18 months) and 30°C/65%RH (3 months). The conditions used in the stability studies are according to the ICH stability guideline. The batches were stored in clear PVC/PVDC and PVC – Al foil blister packs. When stored at 40°C/75%RH (3 months) and at 25°C/60%RH (18 months) no real changes are observed. For the 200 mg capsule a shelf life of 24 months, when stored below 30°C, has been granted.

For the 400 mg capsules stability data on the product have been provided for three pilot-scale batches stored at 25°C/60%RH (24 months), 30°C/65%RH (9 months) and 40°C/75%RH (3 months) in both blister packs. When stored at 40°C/75%RH the dissolution test fails during analysis of 3 months samples. The twenty-four and nine months stability data at 30°C/65%RH and 25°C/60%RH are satisfactory for all the stability pack sizes. No changes in any of the parameters are observed. Therefore for the 400 mg strength a shelf-life of 24 months, when stored below 30°C, has been granted

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A photostability study has been performed on both strengths in line with the NfG on the photostability testing of new active substances and medicinal products and no degradation has been observed

Specific measures concerning the prevention of the transmission of animal spongiform encephalopathies Gelatin is the only excipient obtained from animal origin. A CEP of gelatin as well as a certificate with respect to the TSE/BSE safety is included. This is acceptable.

II.2 Non clinical aspects

This product is a generic formulation of Advil Liquid-Caps which is available on the European market. A non-clinical overview on the pharmacology, pharmacokinetics and toxicology has been provided, which is based on up-to-date and adequate scientific literature. The overview justifies why there is no need to generate additional non-clinical pharmacology, pharmacokinetics and toxicology data. Therefore, the Board agreed that no further non-clinical studies are required.

Environmental risk assessment

The product is intended as a substitute for other identical products on the market. The approval of this product will not result in an increase in the total quantity of ibuprofen released into the environment. It does not contain any component, which results in an additional hazard to the environment during storage, distribution, use and disposal.

II.3 Clinical aspects

Ibuprofen is a well-known active substance with established efficacy and tolerability.

A clinical overview has been provided, which is based on scientific literature. The overview justifies why there is no need to generate additional clinical data. Therefore, the Board agreed that no further clinical studies are required.

For this generic application, the MAH has submitted two bioequivalence studies in which the pharmacokinetic profile of the test products Ibuprofen Liquid caps 200 mg PCH (Pharmachemie B.V., the Netherlands) and Ibuprofen Liquid caps 400 mg Teva (Teva Nederland B.V., the Netherlands) is compared with the pharmacokinetic profile of the reference products Advil Liquid-Caps 200 mg and 400 mg soft capsules (Pfizer B.V., the Netherlands).

The choice of the reference products

The choice of the reference products in the bioequivalence study has been justified by comparison of dissolution results.

The formula and preparation of the bioequivalence batch is identical to the formula proposed for marketing.

Bioequivalence study I - 200 mg

Design

A single-dose, randomised, two-period, two-treatment, two-sequence, crossover bioequivalence study was carried out under fasted conditions in 24 healthy subjects (20 males/4 females), aged 20-41 years. Each subject received a single dose (200 mg) of one of the 2 ibuprofen formulations. The tablet was orally administered with 240 ml water after an overnight fast of 10 hours. There were 2 dosing periods, separated by a washout period of 8 days.

Blood samples were collected pre-dose and at 0.16, 0.33, 0.50, 0.67, 0.83, 1.00, 1.25, 1.50, 1.75, 2.00, 2.25, 2.50, 3.00, 4.00, 6.00, 8.00, 12.00 and 24.00 hours after administration of the products.

Taken into consideration the pharmacokinetics of ibuprofen, the study design is considered adequate for establishing bioequivalence between test and reference product.

Analytical/statistical methods



The analytical method has been adequately validated and is considered acceptable for analysis of the plasma samples. The methods used in this study for the pharmacokinetic calculations and statistical evaluation are considered acceptable.

Results

One subject was withdrawn from the study before the second period due to a positive urine test on drug abuse. Twenty-three subjects were eligible for pharmacokinetic analysis.

Table 1. Pharmacokinetic parameters (non-transformed values; arithmetic mean \pm SD, t_{max} (median, range)) of ibuprofen under fasted conditions.

Treatment N=23	AUC _{0-t}	AUC _{0-∞}	C _{max}	t _{max}	t _{1/2}
	µg.h/ml	μg.h/ml	ug/ml	h	h
Test	59.3 ± 13.3	62.4 ± 13.7	24.7 ± 5.5	0.83 (0.33 – 1.50)	1.88 ± 0.16
Reference	62.0 ± 16.1	65.1 ± 16.2	26.9 ± 4.8	0.67 (0.33 – 1.00)	1.90 ± 0.19
*Ratio (90%	0.96	0.96	0.91		
CI)	(0.92 – 1.00)	(0.92 – 1.00)	(0.84 – 0.98)		
CV (%)	7.8%	7.8%	15.2%		

 $\mathbf{AUC_{0...}}$ area under the plasma concentration-time curve from time zero to infinity $\mathbf{AUC_{0..t}}$ area under the plasma concentration-time curve from time zero to thours

 $\begin{array}{ll} \textbf{C}_{\text{max}} & \text{maximum plasma concentration} \\ \textbf{t}_{\text{max}} & \text{time for maximum concentration} \end{array}$

t_{1/2} half-life

*In-transformed values

The 90% confidence intervals calculated for AUC_{0-t} , $AUC_{0-\infty}$ and C_{max} are in agreement with those calculated by the MAH and are within the bioequivalence acceptance range of 0.80-1.25. Based on the pharmacokinetic parameters of ibuprofen under fasted conditions, it can be concluded that Ibuprofen Liquid caps 200 mg PCH and Advil Liquid-Caps 200 mg soft capsules are bioequivalent with respect to rate and extent of absorption, and fulfil the bioequivalence requirements outlined in the relevant CHMP Note for Guidance.

Bioequivalence study II - 400 mg

Design

A single-dose, randomised, two-period, two-treatment, two-sequence, crossover bioequivalence study was carried out under fasted conditions in 24 healthy subjects (20 males/4 females), aged 19-39 years. Each subject received a single dose (400 mg) of one of the 2 ibuprofen formulations. The tablet was orally administered with 240 ml water after an overnight fast of 10 hours. There were 2 dosing periods, separated by a washout period of 7 days.

Blood samples were collected pre-dose and at 0.16, 0.33, 0.50, 0.67, 0.83, 1.00, 1.25, 1.50, 1.75, 2.00, 2.25, 2.50, 3.00, 4.00, 6.00, 8.00, 12.00 and 24.00 hours after administration of the products.

Taken into consideration the pharmacokinetics of ibuprofen, the study design is considered adequate for establishing bioequivalence between test and reference product.

Analytical/statistical methods

The analytical method has been adequately validated and is considered acceptable for analysis of the plasma samples. The methods used in this study for the pharmacokinetic calculations and statistical evaluation are considered acceptable.



Results

Three subjects withdrew from the study before the second period due to personal reasons and one withdrew on the first day of the second period due to an adverse event. Twenty subjects were eligible for pharmacokinetic analysis.

Table 2. Pharmacokinetic parameters (non-transformed values; arithmetic mean \pm SD, t_{max} (median, range)) of ibuprofen under fasted conditions.

Treatment N=20	AUC _{0-t}	AUC _{0-∞}	C _{max}	t _{max}	t _{1/2}
Test	109.1 ± 18.1	111.4 ± 48.9	38.6 ± 11.1	0.67 (0.33 – 2.5)	2.1 ± 0.7
Reference	112.3 ± 18.5	114.1 ± 19.5	41.1 ± 8.3	0.83 (0.50 – 3.0)	1.8 ± 0.3
*Ratio (90% CI)	0.98 (0.93 – 1.03)	0.98 (0.94 – 1.03)	0.93 (0.82 – 1.04)		
CV (%)	8.6	8.2	22.1		

 $AUC_{0-\infty}$ area under the plasma concentration-time curve from time zero to infinity $AUC_{0-\infty}$ area under the plasma concentration-time curve from time zero to thours

C_{max} maximum plasma concentration time for maximum concentration

t_{1/2} half-life

*In-transformed values

The 90% confidence intervals calculated for AUC_{0-t} , $AUC_{0-\infty}$ and C_{max} are in agreement with those calculated by the MAH and are within the bioequivalence acceptance range of 0.80-1.25. Based on the pharmacokinetic parameters of ibuprofen under fasted conditions, it can be concluded that Ibuprofen Liquid caps 400 mg Teva and Advil Liquid-Caps 400 mg soft capsules are bioequivalent with respect to rate and extent of absorption, and fulfil the bioequivalence requirements outlined in the relevant CHMP Note for Guidance.

Ibuprofen may be taken without reference to food intake. From the literature it is known that food does not interact with the absorption of ibuprofen. Therefore, a food interaction study is not deemed necessary. The bioequivalence study under fasting conditions is in accordance with CPMP/EWP/QWP/1401/98 Note for Guidance on the investigation of bioavailability and bioequivalence.

The MEB has been assured that the bioequivalence studies have been conducted in accordance with acceptable standards of Good Clinical Practice (GCP, see Directive 2005/28/EC) and Good Laboratory Practice (GLP, see Directives 2004/9/EC and 2004/10/EC).

Risk management plan

Ibuprofen was first approved in 1969 and there is now more than 10 years post-authorisation experience with the active substance. The safety profile of ibuprofen can be considered to be well established and no product specific pharmacovigilance issues were identified pre- or post authorisation which are not adequately covered by the current SPC. Additional risk minimisation activities have not been identified for the reference medicinal product. The MAH has a pharmacovigilance system at their disposal, which is based on the current European legislation. Routine pharmacovigilance activities are sufficient to identify actual or potential risks and a detailed European Risk Management Plan is not necessary for this product.

Product information

SPC



The content of the SPC approved during the national procedure is in accordance with that accepted for the reference product Advil Liquid-Caps.

Readability test

The package leaflet has been evaluated via a user consultation study in accordance with the requirements of Articles 59(3) and 61(1) of Directive 2001/83/EC. The test consisted of two rounds with 10 participants each. The questions covered the following areas sufficiently: traceability, comprehensibility and applicability. The readability score was 75% in the first round. Based on the results, some revisions were made. In the second test round, readability was 94%. The readability test has been sufficiently performed.



III OVERALL CONCLUSION AND BENEFIT-RISK ASSESSMENT

Ibuprofen Liquid caps 200 mg PCH, capsule, soft and Ibuprofen Liquid caps 400 mg Teva, capsule, soft have a proven chemical-pharmaceutical quality and are generic forms of Advil Liquid-Caps. Advil Liquid-Caps is a well-known medicinal product with an established favourable efficacy and safety profile.

Bioequivalence has been shown to be in compliance with the requirements of European guidance documents.

The MAH has provided written confirmation that systems and services are in place to ensure compliance with their pharmacovigilance obligations.

The SPC is consistent with that of the reference product. The SPC, package leaflet and labelling are in the agreed templates.

The Board followed the advice of the assessors. The MEB, on the basis of the data submitted, considered that essential similarity has been demonstrated with the reference product, and has therefore granted a marketing authorisation. Ibuprofen Liquid caps 400 mg Teva, capsule, soft were authorised in the Netherlands on 30 May 2011. Ibuprofen Liquid caps 200 mg PCH was authorised on 30 July 2012.

The following post-approval commitments have been made during the procedure:

Quality - medicinal product

- The MAH committed to continue the intermediate and long term studies.
- The MAH committed to include the first three commercial batches in the stability program.

List of abbreviations

ASMF Active Substance Master File

ATC Anatomical Therapeutic Chemical classification

AUC Area Under the Curve BP British Pharmacopoeia

CEP Certificate of Suitability to the monographs of the European Pharmacopoeia

CHMP Committee for Medicinal Products for Human Use

CI Confidence Interval

C_{max} Maximum plasma concentration

CMD(h) Coordination group for Mutual recognition and Decentralised procedure for

human medicinal products

CV Coefficient of Variation EDMF European Drug Master File

EDQM European Directorate for the Quality of Medicines

EU European Union
GCP Good Clinical Practice
GLP Good Laboratory Practice
GMP Good Manufacturing Practice

ICH International Conference of Harmonisation

MAH Marketing Authorisation Holder

MEB Medicines Evaluation Board in the Netherlands

OTC Over The Counter (to be supplied without prescription)

PAR Public Assessment Report Ph.Eur. European Pharmacopoeia

PIL Package Leaflet

PSUR Periodic Safety Update Report

SD Standard Deviation

SPC Summary of Product Characteristics

 $t_{1/2}$ Half-life

 $t_{\text{max}} \hspace{1.5cm} \text{Time for maximum concentration} \\$

TSE Transmissible Spongiform Encephalopathy USP Pharmacopoeia in the United States

STEPS TAKEN AFTER THE FINALISATION OF THE INITIAL PROCEDURE - SUMMARY

Procedure number	Type of modification	Date of start of the procedure	Date of end of the procedure	Approval/ non approval	Assessment report attached
	IA	12-9-2011	11-11-2011	Approval	N
	number	number modification	number modification of the procedure	number modification of the procedure procedure	number modification of the of the procedure procedure approval