

Public Assessment Report

Scientific discussion

Lacomed
(lacosamide)

SE/H/2420/01/DC

This module reflects the scientific discussion for the approval of Lacomed. The procedure was finalised on 2024-04-24. For information on changes after this date please refer to the module 'Update'.

I. INTRODUCTION

Based on the review of the quality, safety and efficacy data, a marketing authorisation has been granted for Lacomed, 10 mg/ml, syrup.

The active substance is lacosamide. A comprehensive description of the indication and posology is given in the SmPC.

For recommendations to the marketing authorisation not falling under Article 21a/22a/22 of Directive 2001/83/EC and conditions to the marketing authorisation pursuant to Article 21a/22a/ 22 of Directive 2001/83/EC to the marketing authorisation, please see section VI.

The application for Lacomed, 10 mg/ml, syrup, is a generic application submitted according to Article 10(1) of Directive 2001/83/EC. The applicant applies through the Decentralised Procedure with Sweden acting as reference member state (RMS) and DE as concerned member state (CMS).

The reference medicinal product chosen for the purposes of establishing the expiry of the data protection period is Vimpat, 10 mg/ml, syrup, authorised in EU since 2008, with UCB Pharma SA as marketing authorisation holder.

Potential similarity with orphan medicinal products

N/A

II. QUALITY ASPECTS

II.1 Drug Substance

The structure of the drug substance has been adequately proven and its physico-chemical properties are sufficiently described.

The manufacture of the drug substance has been adequately described and satisfactory specifications have been provided for starting materials, reagents and solvents.

The drug substance specification includes relevant tests and the limits for impurities and degradation products have been justified. The analytical methods applied are suitably described and validated.

Stability studies confirm the retest period.

II.2 Medicinal Product

The medicinal product is formulated using excipients listed in section 6.1 in the Summary of Product Characteristics.

The manufacturing process has been sufficiently described and critical steps identified.

The tests and limits in the specification are considered appropriate to control the quality of the finished product in relation to its intended purpose.

Stability studies have been performed and data presented support the shelf life and special precautions for storage claimed in the Summary of Product Characteristics, sections 6.3 and 6.4.

III. NON-CLINICAL ASPECTS

Pharmacology/Pharmacokinetics/Toxicology

Pharmacodynamic, pharmacokinetic and toxicological properties of lacosamide are well known. As lacosamide is a widely used, well-known active substance, no further studies are required and the applicant provides none. Overview based on literature review is, thus, appropriate.

Environmental Risk Assessment (ERA)

Since Lacomed is a generic product, it will not lead to an increased exposure to the environment. An environmental risk assessment is therefore not deemed necessary.

There are no objections to approval of Lacomed from a non-clinical point of view.

IV. CLINICAL ASPECTS

Pharmacokinetics

No bioequivalence study has been submitted. The applicant claims that a bioequivalence study is not necessary according to the Guideline on the investigation of Bioequivalence (CHMP/QWP/EWP/1401/98 Rev. 1) since the product is an aqueous oral solution.

Pharmacokinetic properties of the active substance

Lacosamide has an oral bioavailability of approximately 100 %. Following oral administration lacosamide plasma concentration increases proportionally with dose (100-800 mg) and maximal plasma concentrations occur at approximately 0.5 to 4 hours. The terminal half-life is approximately 13 hours. The pharmacokinetics of lacosamide is not affected by food, and therefore there are no restrictions with respect to food in the SmPC of the originator.

Discussion and overall conclusion

The product applied for is to be administered as an aqueous oral solution. The qualitative composition is almost identical to the composition of the currently authorised product, the amount of active substance is the same, and the amounts of excipients that could possibly affect bioavailability are very similar. For this type of product, no bioequivalence studies are required according to the Guideline on the investigation of Bioequivalence (CHMP/QWP/EWP/1401/98 Rev. 1). Thus, the absence of bioequivalence studies is acceptable.

Pharmacodynamics/Clinical efficacy/Clinical safety

No new studies on pharmacodynamics, clinical efficacy or clinical safety have been submitted, which is acceptable.

Risk Management Plan

The MAH has submitted a risk management plan, in accordance with the requirements of Directive 2001/83/EC as amended, describing the pharmacovigilance activities and interventions designed to identify, characterise, prevent or minimise risks relating to Lacomed.

Part II: Safety specification

The MAH has submitted the version 0.2 RMP dated 2023-08-21 and proposed the following summary safety concerns:

Important Identified Risks	• Cardiac adverse events that may be potentially associated with PR interval prolongation and sodium channel modulation
Important Potential Risks	• None
Missing Information	• Pregnant or lactating women • Impact on long-term growth, long-term neurodevelopment, and on puberty in pediatric population

Assessor's comments: The summary of safety concern is in line with the latest version of the reference product, which is endorsed.

Part III: Pharmacovigilance Plan

Routine pharmacovigilance is suggested and no additional pharmacovigilance activities are proposed by the applicant, which is endorsed.

Part V: Risk minimisation measures

Routine risk minimisation is suggested and no additional risk minimisation activities are proposed by the applicant, which is endorsed.

Part VI: Summary of the RMP

The MAH has satisfactorily responded to the questions raised and updated the RMP accordingly.

Issue is resolved.

Conclusion of the RMP assessment

The submitted Risk Management Plan, version 0.2 signed 2023-08-21 is considered acceptable.

The MAH shall perform the required pharmacovigilance activities and interventions detailed in the agreed RMP presented in Module 1.8.2 of the Marketing Authorisation and any agreed subsequent updates of the RMP.

An updated RMP should be submitted:

- At the request of the RMS;
- Whenever the risk management system is modified, especially as the result of new information being received that may lead to a significant change to the benefit/risk profile or as the result of an important (pharmacovigilance or risk minimisation) milestone being reached.

If the dates for submission of a PSUR and the update of a RMP coincide, they can be submitted at the same time, but via different procedures.

V. USER CONSULTATION

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 language used for the purpose of user testing the PL was English.

The results show that the package leaflet meets the criteria for readability as set out in the Guideline on the readability of the label and package leaflet of medicinal products for human use.

VI. OVERALL CONCLUSION, BENEFIT/RISK ASSESSMENT AND RECOMMENDATION

The quality of the generic product, Lacomed, is found adequate. There are no objections to approval of Lacomed, from a non-clinical and clinical point of view. The absence of bioequivalence studies is acceptable. The product information is acceptable. The benefit/risk ratio is considered positive, and the application is therefore recommended for approval.

List of recommendations not falling under Article 21a/22a/22 of Directive 2001/83/EC in case of a positive benefit risk assessment

N/A

List of conditions pursuant to Article 21a/22a or 22 of Directive 2001/83/EC

N/A

VII. APPROVAL

The decentralised procedure for Lacomed, 10 mg/ml, syrup was positively finalised on 2024-04-24.

Public Assessment Report – Update

Procedure number*	Scope	Product Information affected (Yes/No)	Date of end of procedure	Approval/non approval	Summary/Justification for refuse

*Only procedure qualifier, chronological number and grouping qualifier (when applicable)