

Public Assessment Report Scientific discussion

Thiopental ELC Group (thiopental sodium)

SE/H/2148/01-02/DC

This module reflects the scientific discussion for the approval of Thiopental ELC Group. The procedure was finalised on 2022-04-29. 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 Thiopental ELC Group, 0,5 g, 1 g, Powder for solution for injection.

The active substance is thiopental sodium, thiopental. 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 Thiopental ELC Group, 500 mg and 1 g, powder for solution for injection, is a generic application made according to Article 10(1) of Directive 2001/83/EC. The applicant, ELC Group s.r.o., applies through the Decentralised Procedure with Sweden acting as reference member state (RMS) and DK, FI and NO as concerned member states (CMS).

The reference medicinal product chosen for the purposes of establishing the expiry of the data protection period is Pentothal Natrium, 500 mg and 1 g, powder for solution for injection authorised in RMS since 1940, with Hospira enterprises B.V. as marketing authorisation holder.

European Reference Product (ERP)

A European Reference Product is used in RMS and CMS DK, FI and NO: Pentothal Natrium, 500 mg and 1 g, powder for solution for injection authorised in RMS since 1940, with Hospira enterprises B.V. as marketing authorisation holder.

The justification to use this product is based on RMS's own files. The ERP information was circulated during the validation period.

Potential similarity with orphan medicinal products

According to the application form and a check of the Community Register of orphan medicinal products the following medicinal product(s) has/have been designated as orphan medicinal products, but not yet been granted a marketing authorisation in the EU: EU/3/16/1629, EU/3/21/2554.

The applicant should monitor these products during the entire procedure to check if a marketing authorisation has been granted. In case a marketing authorisation is granted, the applicant should submit a report on similarity (Module 1.7.1) and, if applicable, submit the data to support derogation from orphan market exclusivity (Module 1.7.2).

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 active substance are well known. As active substance 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 Thiopental ELC Group 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 Thiopental ELC Group from a non-clinical point of view.

IV. CLINICAL ASPECTS

Pharmacokinetics

To support the application, the applicant has not submitted any bioequivalence studies.

Pharmacokinetic properties of the active substance

Thiopental is almost completely metabolized and only approximately 0.3 % is excreted unchanged in the urine. The half-life of the distribution phase after a single intravenous dose is 2-4 hours and the half-life of the elimination phase is 9-11 hours.

Biowaiver

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 parenteral solution.

Discussion and overall conclusion

The applied product is to be administered as an aqueous intravenous solution containing the same active substance as the reference product. None of the excipients are known to interact with the drug substance. 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 Thiopental ELC Group.

Safety specification

The MAH has submitted the version 0.2 RMP dated 29/11/2021 and proposed the following summary safety concerns:

Summary of safety concerns	
Important identified risks	None
Important potential risks	None
Missing information	None

Pharmacovigilance Plan

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

Risk minimisation measures

Routine Risk minimisation measures is suggested and no RMM are proposed by the applicant, which is endorsed.

Summary of the RMP

The submitted Risk Management Plan, version 0.2 signed 29/11/2021 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, Thiopental ELC Group, is found adequate. There are no objections to approval of Thiopental ELC Group, from a non-clinical and clinical point of view. The product information is acceptable. The benefit/risk 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 Thiopental ELC Group, 0,5 g, 1 g, Powder for solution for injection was positively finalised on 2022-04-29.

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)