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GMP requirements applicable to the early manufacturing steps for comminuted plants and herbal extracts used as active substances

Question

What are the GMP requirements applicable to the comminution and initial extraction steps in the manufacture of non-transgenic comminuted plants and herbal extracts used as active substances?

Answer

As active substances, herbal extracts are manufactured in accordance with EU Good Manufacturing Practice (GMP) Part II - *Basic Requirements for Active Substances used as Starting Materials*. In addition, and as stated in Part II, supplementary guidance applies as per EU GMP Annex 7 - *Manufacture of Herbal Medicinal Products*. For the GMP classification, reference should be made to the table illustrating the application of Good Practices to the manufacture of herbal medicinal products included in annex 7, which "*expands in detail the herbal section of Table 1 in part II of the GMP Guide.*"

Specifically, as set by EU GMP Annex 7, comminution and initial extraction steps in the manufacture of non-transgenic comminuted plants and herbal extracts used as active substances should be carried out in compliance with the requirements of EU GMP Part II. Herbal active substance representing itself the finished product will be considered in a Q&A for finished products.

In some exceptional circumstances that should be justified in the relevant marketing authorisation/ registration documentation, provided that the cultivation is in compliance with GACP (Good Agricultural and Collection Practice), it is acceptable that the early manufacturing steps such as expression from plants and distillation are performed in the field, when they represent an integral part of harvesting to maintain the quality of the product within the approved specifications. In this case, appropriate documentation, control, and validation according to the GMP principles should be assured by the API manufacturer as part of its supplier qualification. Regulatory authorities may assess compliance of these activities during GMP inspections.

NB: The case of transgenic plants is covered separately by EU GMP Annex 2.

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References

EU GMP Part II – Basic requirements for active substances used as starting materials: Application table

EU GMP Annex 7 - Manufacture of Herbal Medicinal Products: Application table

EU GMP Annex 2 - Manufacture of Biological active substances and Medicinal Products for Human Use: - Application table

Ph. Eur. 1434 monograph - Herbal drug preparations