



Public Assessment Report

Pharmacy to General Sales List Reclassification

Deep Relief Anti-Inflammatory Gel

Ibuprofen (5%) and Levomenthol (3%)

PL 00189/0027-0060

THE MENTHOLATUM COMPANY LIMITED

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The Medicines and Healthcare products Regulatory Agency (MHRA) is the UK Government agency responsible for regulating medicines and medical devices. We continually review the safety of medicines and vaccines in the UK, and inform healthcare professionals and the public of the latest updates through several means, including public reclassification reports. Suspected side effects to any drug or vaccine can be reported to MHRA by both healthcare professionals and members of the public via the Yellow Card Scheme (<https://yellowcard.mhra.gov.uk/>).

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1 Introduction

Deep Relief Anti-Inflammatory Gel can be used in adults and children aged over 12 years for the relief of rheumatic pain, muscular aches, pains, and swellings such as strains, sprains, and sports injuries.

Each gram (g) of the product contains 50 milligrams (mg) (5%) of ibuprofen and 30 mg (3%) of levomenthol.

The licence holder¹, The Mentholatum Company Limited, applied to make 100 g pack size of Deep Relief Anti-Inflammatory Gel available as a General Sales List medicine for sale through general retail outlets (see Background for definition).

The Medicines and Healthcare Products Regulatory Agency (MHRA) considers this product sufficiently safe to be sold on general sale. This report outlines the evidence that the MHRA reviewed and which led to the decision to approve the application.

2 Background

Ibuprofen reduces substances in the body that cause pain and swelling and therefore acts to relieve pain and reduce inflammation (it is a non-steroidal anti-inflammatory drug [NSAID]). Levomenthol, when applied to the skin, narrows the blood vessels causing a sensation of coldness followed by a pain-relieving effect.

Pharmacy medicines can be supplied without prescription only from pharmacies, by or under the supervision of a pharmacist. General Sales List medicines can be sold or supplied in other retail outlets other than pharmacies by someone who is not a pharmacist.

Deep Relief Anti-inflammatory Gel (product licence [PL] 00189/0027), in pack sizes of 15 g, 20 g, 30 g, and 50 g, has been available on the UK market with General Sales List legal classification since April 1998. The pack size of 100 g was available with Pharmacy legal classification in the UK market from April 1998 to June 2015. This product is now marketed under a new licence (PL 00189/0036) as Deep Relief Joint Pain Gel.

As per the other pack sizes, the 100 g pack size of Deep Relief Anti-inflammatory Gel can be used in adults and children aged over 12 years for the relief of rheumatic pain, muscular aches, pains, and swellings such as strains, sprains, and sports injuries.

3 Proposed Terms of Reclassification

The Mentholatum Company Limited proposed to make Deep Relief Anti-Inflammatory Gel available through general retail outlets with the following terms of reclassification:

- a) Pack size: 100 g

¹ A licence holder or marketing authorisation holder is the company with legal authorisation to make the medicine available to patients.



- b) Used in adults and children aged over 12 years for the relief of rheumatic pain, muscular aches, pains, and swellings such as strains, sprains, and sports injuries
- c) Dose: 10-40 mm (containing 50-125 mg ibuprofen) up to a maximum of three times a day for up to 2 weeks
- d) Route of administration: applied locally to the skin
- e) Strength: 1 g of gel contains 50 mg (5%) ibuprofen and 30 mg (3%) levomenthol
- f) Duration of treatment: up to 2 weeks.

4 General Sales List Criterion

Under the provisions of The Human Medicines Regulations 2012, regulation 62(5), General Sales List is appropriate for medicines that can, with reasonable safety, be sold or supplied by someone other than a pharmacist.

The term “with reasonable safety” has been defined as: “where the hazard to health, the risk of misuse, or the need to take special precautions in handling is small and where wider sale would be a convenience to the purchaser.”

5 Assessment of suitability for General Sales List availability

The MHRA assessed the application against the General Sales List criterion, as stated in section 4.

5.1 Hazard to health

5.1.1 Safety Profile

Based on the post-marketing experience² between March 2012 to February 2017, approximately 13,000,000 patients have had exposure to Deep Relief Anti-inflammatory Gel.

The worldwide safety data received by The Mentholatum Company Limited for Deep Relief Anti-Inflammatory Gel, from January 2005 until 13 April 2017, showed that 27 adverse event (side effects) reports were received, all of which were non-serious. No significant safety concern was identified. These adverse events included redness and itching of the skin where the gel had been applied. Since the amount of medicine that goes through the skin is lower than when it is taken by mouth, more serious side effects would not be expected.

There are currently other General Sales List medicines available in the UK in a pack size of 100 g that contain the same or similar concentrations of either ibuprofen or menthol. For example, Radian B Anti-Inflammatory Ibuprofen 5% w/w gel (PL 00240/0358), which contains 5% of ibuprofen, and Deep Heat Rub (PL 00189/5002R), which contains 5.91% of menthol. These products also provide a similar number of days of treatment as in the application. Therefore, no major differences are expected in terms of the safety of this product compared with the other examples of 100 g products that are currently available as General Sales List medicines.

The maximum duration of use has been limited to 2 weeks, which has been emphasised clearly on the product information. This maximum duration of treatment is considered safe enough for users to

² Post-marketing experience estimates how many people have taken a medicine and how many side effects have been reported after it has been released onto the market.



self-treat their condition without masking any underlying serious conditions. This is consistent with other General Sales List medicines applied to the skin that contain the same amount of ibuprofen, which also recommend a maximum duration of 2 weeks before speaking to a doctor or pharmacist for further advice. For example, the label and patient information leaflet for Radian-B Anti-Inflammatory Ibuprofen 5% w/w gel (PL 00240/0358) consists of the warning ‘You must contact your doctor if your symptoms worsen at any time, or do not improve after 2 weeks’.

5.1.2 Drug Interactions

The summary of product characteristics (SPC)³ of the product states that the combined use of ibuprofen with aspirin or other NSAIDs may cause an increase in the occurrence of side effects. However, due to the low absorption of the product into the body in normal conditions, the interactions described for oral NSAIDs would not be expected. During post-marketing experience, no drug interactions were reported. No interaction studies have been performed, and the product information (label and leaflet⁴) advises users to consult their doctor or pharmacist if they are taking other medication. In particular, section 2 of the patient information leaflet states “Please tell your doctor or pharmacist if you are taking or have recently taken any other medicines. This includes medicines you have bought without a prescription.” Also, the carton of the tube consists of the warning “Consult your doctor before use if you are taking aspirin, any painkillers or if you are pregnant”.

5.2 Risk of Misuse

5.2.1 Pack Size

The pack size of 100 g would provide approximately 13 days of treatment of Deep Relief Anti-Inflammatory Gel when used at the maximum dose, and approximately 33 days of treatment when used at the minimum dose. There are no other products containing the same amounts of both ibuprofen and levomenthol in a 100-g pack size that are available as a General Sales List medicine. Therefore, The Mentholatum Company Limited has provided examples of other products available as a General Sales List medicine that are available in 100 g pack sizes which consist of either Ibuprofen or menthol in the same or similar amounts (see section 5.1.1 Safety Profile).

Because the product information has been updated to ensure use of the product does not exceed more than 2 weeks, the risk of misuse has been minimised.

5.3 Special Precautions in Handling

There are no special precautions required in handling Deep Relief Anti-Inflammatory Gel.

5.4 Wider sale would be a convenience

The MHRA accepts that a larger pack size (i.e. 100 g) would enable users who are using the gel to relieve symptoms of a large area (such as the back or hip), to have access to a sufficient amount of medicine from one pack.

³ The summary of product characteristics is a description of a medicinal product's properties and the conditions attached to its use.

⁴ The label and leaflet (patient information leaflet) provide information to patients about the medicine, including information about how to use them.



This wider availability would enable users to have an increased choice of treatment to better control their symptoms. It would also allow for users to use the gel up to the maximum of 2 weeks before seeking medical advice, as the current largest pack size available as a General Sales List medicine (50 g) provides less than 7 days of treatment when used at the maximum dose.

5.5 Risk Management Plan

The normal practices to monitor the safety of Deep Relief Anti Inflammatory Gel are considered sufficient to address the identified and potential risks. The identified risks will be managed using current practices, such as the clear advice in the product information on how to use the product safely and correctly. No additional measures, such as speaking to a pharmacist, are considered necessary.

6 Reasons for not seeking advice from the Commission on Human Medicines⁵

No major issues have been identified in the assessment of this application. The availability of a 100-g pack size as a General Sales List medicine would result in minimal changes based on the following reasons:

1. The proposed use of the medicine, dosing regimen, route of administration, strength, and duration of treatment are the same as those for the currently approved pack sizes of 30 g and 50 g on this licence.
2. There is an approved General Sales List product that also contains ibuprofen 5% and is available in a pack size of 100 g.
3. The product information has been updated to limit the duration of use to 2 weeks.
4. There are marketed General Sales List products that contain a higher strength than 3% levomenthol.
5. Although a 100-g pack size would provide more than 2 weeks treatment when used at the minimum dose, other General Sales List products available also provide the same number of doses and no issues were raised regarding this when these products were reclassified.

7 Conclusion

The MHRA has taken the decision to approve General Sales List legal status for the 100-g pack size of Deep Relief Anti-Inflammatory Gel.

General Sales List availability of this pack size will be valuable to people who are treating a larger area of their body, as 100 g would provide a sufficient amount of treatment.

The risks of misuse including the continued use of the gel is minimised by the addition of the precaution on the label and leaflet to ensure advice from a doctor or pharmacist is sought if any signs of illness continue for longer than 2 weeks.

The safety profile, the low likelihood of side effects and low risk of potential drug interactions is supported by the fact that this product has a well-established use, and that current 100g products

⁵ The Commission on Human Medicines (CHM) advises ministers on the safety, efficacy and quality of medicinal products. Their views are sought on reclassifications when more complex or new reclassifications of medicines are being proposed.



exist on the market containing the same amount of the NSAID (ibuprofen) as Deep Relief Anti-Inflammatory gel.

**Medicines and Healthcare products Regulatory Agency,
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