



## **Public Assessment Report**

### **Prescription only medicine to Pharmacy Reclassification**

### **Ibuprofen Twelve Plus Pain relief 200mg/5ml Oral Suspension**

**PL 35533/0034**

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# 1. Background on deciding where medicines are available

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## The role of MHRA

MHRA regulates medicines and medical devices in the UK, on behalf of the UK Licensing Authority. This means that MHRA decides whether medicines are available:

- on prescription only - 'prescription only medicine' (POM)
- bought from pharmacies - 'pharmacy medicine' (P)
- bought from other shops - 'general sales list medicine' (GSL)

## What is re-classification of a medicine?

Making a change on where a medicine is available is called 're-classification'. This is sometimes referred to as 'switching'. To decide on this change, MHRA may:

- take advice from its committees of external experts
- take advice from a group ('stakeholder group') of health professionals and representatives of people affected by the classification change
- run a public consultation

To be reclassified from POM to P, a medicine must:

- be unlikely to be a direct or indirect danger to human health when used without the supervision of a doctor, even if used correctly
- be generally used correctly (ie not frequently or to a wide extent used correctly)
- not contain substances or preparations of substances where the activity of the product or its side effects require further investigation
- not normally be prescribed by a doctor for injection (parenteral administration)

## What evidence is needed?

A company or organisation can ask MHRA for a medicine to be available as a pharmacy medicine or a general sale medicine. To do this, they need to get together evidence to show that the medicine

- a) is likely to be used appropriately, and
- b) with relatively little danger to the public.

This evidence needs to focus on the risk to the public. This includes evidence on the possible abuse or misuse of the medicine. The evidence may include:

- clinical studies
- evidence showing acceptable level of side effects
- advice of experts
- views of relevant health professionals and their professional bodies
- views of relevant public associations and individuals with an interest in the medicine under consideration.

## Who makes the final decision?

The final decision on whether to approve a change is made by the MHRA, on behalf of the UK Licensing Authority.

## 2. About Ibuprofen Twelve Plus Pain Relief

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Ibuprofen Twelve Plus Pain Relief 200mg/5ml Oral Suspension<sup>1</sup> is a medicine for the short-term relief of: migraine, headaches, backache, dental pain, neuralgia and period pains as well as rheumatic and muscular pains, pain of non-serious arthritic conditions, cold and flu symptoms. It can be used in adults and children over 12 years.

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<sup>1</sup> A liquid medicine.

The full name of the medicine is Ibuprofen Twelve Plus Pain Relief 200mg/5ml Oral Suspension – in this document, we will call it 'Ibuprofen Twelve Plus Pain Relief'.

In April 2014 the Commission on Human Medicines advised that an oral suspension product containing ibuprofen 200mg/5ml for the same indication in children aged 7-12 years only can be available as a Pharmacy medicine<sup>2</sup> (PL 04917/0099). The Commission on Human Medicines provides advice to the Licensing Authority on changes to the legal status of medicines in circumstances which require expert advice, for example, but not limited to, the first product in a therapeutic category or a new target population. .

This report outlines the evidence that the MHRA reviewed which led to the decision to approve this application.

### **What is in Ibuprofen Twelve Plus Pain Relief?**

Ibuprofen Twelve Plus Pain Relief is an oral suspension containing 200mg ibuprofen in every 5ml liquid dose.

This is the second product containing liquid ibuprofen product at 200mg/5ml strength to be available without prescription. The first was for the similar indications in children aged 7-12 years, whereas this product is for adults and children over 12 years.

### **What is ibuprofen used for?**

Ibuprofen is a non-steroidal anti-inflammatory drug (NSAID). It is currently available from several companies as a suspension, tablets, powders and granules as Prescription only medicine, a Pharmacy medicine or a General Sales List medicine. As a Pharmacy or General Sales List medicine, it is used to reduce pain and fever in both adults and children. Further details of these conditions are provided below -

**Ibuprofen is available as a General Sales List medicine under the following conditions:**

Tablets, capsules, powders, granules

- Maximum strength: 200mg
  - For rheumatic or muscular pain, backache, neuralgia, migraine, headache, dental pain, dysmenorrhoea, feverishness, symptoms of colds and influenza.
  - Adults and children over 12.
- Maximum dose: 400mg. Maximum daily dose: 1200mg  
Maximum pack: 16 tabs or caps, 12 sachets of powder or granules

Liquid

- Max strength 2% (100mg in 5ml).  
For the treatment of rheumatic or muscular pain, headache, dental pain, feverishness, or symptoms of colds and influenza.  
For children under the age of 12 years  
Maximum dose: 200mg. Maximum daily dose: 800mg.  
Maximum pack: Individual unit doses of not more than 5ml each in a pack containing not more than 20 doses *or*  
Multidose containers containing not more than 100ml of product.

**Ibuprofen is available as a Pharmacy medicine under the following conditions:**

- For rheumatic and muscular pain, pain of non-serious arthritic conditions, backache, neuralgia, migraine, headache, dental pain, dysmenorrhoea, feverishness, symptoms of colds and influenza.
- Maximum dose: 400mg (600mg for prolonged-release preparations)
- Maximum daily dose: 1,200mg.

### **Who has made the proposal?**

The licence-holder for Ibuprofen Twelve Plus Pain Relief (Aspire Pharma Limited) applied to make this product available through Pharmacies.

<sup>2</sup> Public Assessment Report, Ibuprofen Seven Plus 200mg/5ml Oral Suspension, Annex 1.  
<http://www.mhra.gov.uk/home/groups/par/documents/websitesources/con137735.pdf>

### 3. Proposed terms of reclassification

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#### What are the details of this change?

Ibuprofen Twelve Plus Pain Relief will be made available through Pharmacy outlets under the following conditions:

- Oral use
- Strength: 200mg/5ml Ibuprofen
- For use in adults and children over 12 years
- For the short-term relief of: migraine, headaches, backache, dental pain, neuralgia and period pains as well as rheumatic and muscular pains, pain of non-serious arthritic conditions, cold and flu symptoms.
- Dose: 5ml-10ml (200mg-400mg) three times daily;
- Maximum length of treatment: 3 days for children and adolescents between 12-18 years; 10 days for adults.
- Maximum pack size: 100ml.

### 4. How the proposal was assessed

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To be reclassified from POM to P, a medicine must:

- be unlikely to be a direct or indirect danger to human health when used without the supervision of a doctor, even if used correctly
- be generally used correctly (ie not frequently or to a wide extent used correctly)
- not contain substances or preparations of substances where the activity of the product or its side effects require further investigation
- not normally be prescribed by a doctor for injection (parenteral administration)

These criteria are set out in the Human Medicines Regulations 2012, regulation 62(3).

#### Assessment of suitability for Pharmacy availability

The MHRA assessed the application against these criteria for reclassification:

##### *Direct danger*

It is considered that ibuprofen is well established in the Pharmacy and General Sales List setting and the risks of direct danger are no greater than other liquid ibuprofen products. "Direct danger" means that a danger may be present if the product causes adverse reactions that are important. The dose, age range, use, and pack size for this product are all within accepted parameters for other liquid ibuprofen products available as Pharmacy medicines.

##### *Indirect danger*

It is accepted that as ibuprofen is already available in both P and GSL settings, for treatment of the listed conditions in children, there are no additional indirect risks in this regard which arise from the active ingredient, ibuprofen. "Indirect dangers" are considered to be when treatment might mask an underlying condition that requires medical attention.

There is considered to be a risk of confusing the 200mg/5ml product with many of the other ibuprofen suspension products which are already available without prescription – either the 200mg/5ml product for 7-12 year olds, or the many ibuprofen suspensions available which are half the strength (100mg/5ml). The risk is that a parent/carer, who may be used to giving quantities of suspension suitable for the 100mg/5ml product, might give twice the dose if they give the same volume of this product. This risk of confusion is considered to be greater in households where there may be two or more children of different ages (particularly under or over 12) using other ibuprofen oral suspensions. The applicant addressed the risk of double dosing in all children from 3 months–18 years, as the 100mg/5ml suspension is authorised as a Pharmacy medicine from 3 months old.

The company has proposed appropriate risk minimisation measures to manage the risk of confusion. This will be done by clear warnings and dosage instructions on the leaflet and label, by adding the words, “double strength” clearly highlighted to the outer box and to the label on the bottle itself, and including “Twelve Plus” in the name to identify the correct age range. Additionally as a Pharmacy medicine this product will be supplied only from pharmacies under the supervision of a pharmacist and therefore pharmacy staff can provide additional advice on correct use. It is considered that the risk of confusion and therefore indirect danger is low.

*Incorrect use – frequently and to a very wide extent*

There is no evidence that any ibuprofen products are frequently and to a very wide extent used incorrectly.

*Activity and/or adverse reactions require further investigation*

This medicinal product contains only ibuprofen as the active ingredient. The activity of and adverse reactions to ibuprofen are well known.

*Is normally prescribed as an injection*

This product is for oral use only, so this criterion does not apply.

## **5. Further details on the application**

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### **Risk Management Plan**

The application contains a risk management plan (RMP). RMPs are documents that contain information on a medicine’s safety profile and one or more of the following:

- how any risks identified in the safety profile will be prevented or minimised in patients
- plans for studies and other activities to gain more knowledge about the safety and efficacy of the medicine
- risk factors for side effects
- measuring the effectiveness of measures taken to prevent or minimise risks.

The RMP for this product has identified the main risk to be pharmacists and/or parents/carers confusing it with the 100mg/5ml ibuprofen liquid products, which are half the strength. This risk has been minimised by clear warnings on the leaflet and label. Also, as the product will be classified as a Pharmacy medicine additional advice on correct use will also be available from the pharmacy staff.

## **6. Reasons for not seeking advice from the Commission on Human Medicines**

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CHM advised in favour of ibuprofen 200mg/5ml oral suspension being available as a Pharmacy medicine for either 7-12 year olds or 12+ years in April 2014. The reason for limiting the age range was to simplify the label and leaflet as indications and dosing instructions for 7-12 years, and 12+ on the same label was considered to be too complex. Overall, no new issues of concern have been raised in relation to Pharmacy availability of Ibuprofen Twelve Plus Pain Relief. The patient information leaflet text and design have been revised, improved and user-tested to ensure that patients can make an informed decision about this medicine.

## 7. Conclusion

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The MHRA has taken the decision to approve Pharmacy legal status for Ibuprofen Twelve Plus Pain Relief under the following conditions:

- Oral use
- Strength: 200mg/5ml Ibuprofen
- For use in adults and children over 12 years
- For the short-term relief of: migraine, headaches, backache, dental pain, neuralgia and period pains as well as rheumatic and muscular pains, pain of non-serious arthritic conditions, cold and flu symptoms.
- Dose: 5ml – 10ml (200mg – 400mg) three times daily;
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