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The European Falsified Medicines Directive

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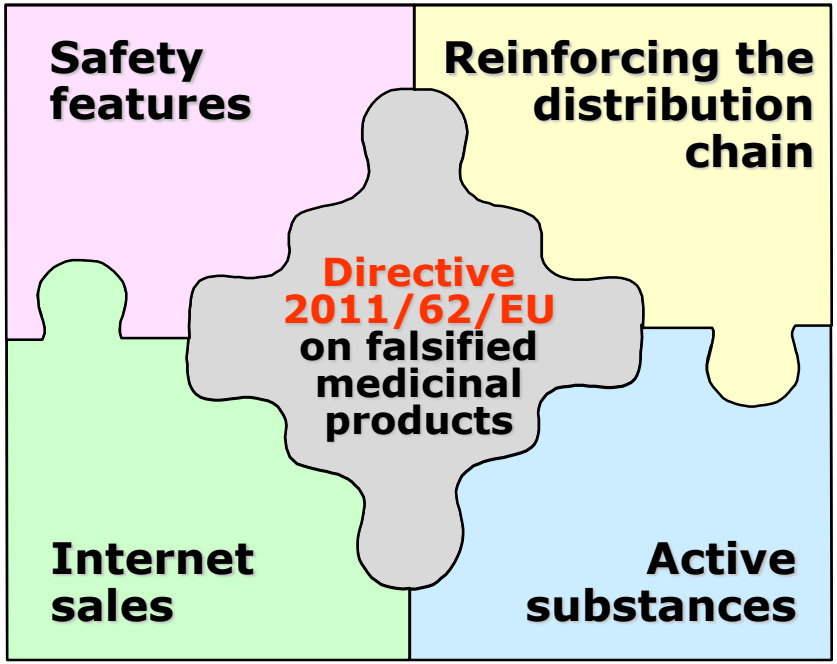
EU Action Against Falsified Medicines



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Reinforcing the distribution chain

New/Updated GDP guidelines:

- For medicinal products (November 2013)
- For APIs (March 2015)

EudraGMDP

- EU database of medicinal product distributors

API distributors

- Mandatory registration with NCAs

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Active substances

APIs can only be imported into the EU if :

- Written confirmation on GMP for API; or
- Exporting country is "listed" by the Commission; or
- EU GMP certificate.

New requirements for API manufacturers :

- Registration of EU API manufacturers and importers;
- Audit by manufacturers of medicinal products;
- Inspections by NCAs;
- Legally binding GMP for APIs (based on ICH Q7)

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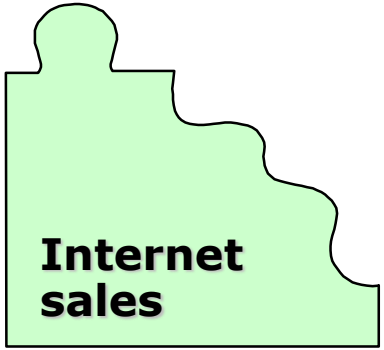

EU common logo for online pharmacies

- Since 1 July 2015, a EU common logo identifies all websites legally selling medicinal products in the EU
- Clicking the logo securely redirects to a list of authorised pharmacies in a given MS

Online pharmacies must be registered

- By the NCA of the Member State in which they are established

Awareness campaigns by MS to inform

- On the risks of buying online
- On the functioning of the common logo

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Safety features

Unique identifier (UI)

Code enabling:
- the identification and
- the authentication

of a given pack.

Anti-tampering device (ATD)

Device allowing the verification of whether a pack has been opened/tampered with.

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Safety features

Delegated Regulation 2016/161

- Lays down detailed rules for the safety features appearing on the packaging of medicinal products
- Applies as of 9th February 2019 in all MS.
- Packs on the market before February 2019 can stay on the market until their expiry date
- BE, EL and IT may defer the application by up to 6 years.

COMMISSION DELEGATED REGULATION (EU) 2016/161

of 2 October 2015

supplementing Directive 2001/83/EC of the European Parliament and of the Council by laying down detailed rules for the safety features appearing on the packaging of medicinal products for human use

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

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Safety features

Regulation 2016/161 provides for:

- Technical characteristics of the UI
- Repositories system for the UI
- Verification of the safety features
- List of exceptions from bearing/not bearing the safety features

Regulation 2016/161 does not provide for:

- Technical options for the anti-tampering device

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Safety features

Scope : principles

- **Prescription medicines** for human use must bear the safety features.
- **Non-prescription medicines** for human use are exempted.

Scope : exceptions

- **Prescription medicines** exempted from the safety features: homeopathics, radiopharmaceuticals, ATMPs, medical gases, certain solutions, contrast media, allergy tests and allergens.
- **Non-prescription medicines** requested to bear the safety features: Omeprazole 20 or 40 mg (reported incidents of falsification)

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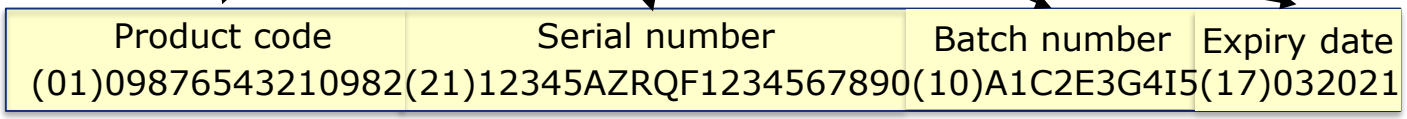
Safety features

Unique Identifier (UI) : composition

- Product code:
  - ISO-compliant (ISO 15459)
  - < 50 characters
  - globally unique
  - issued by ISO-compliant coding agencies
- Serial number (max 20 characters; randomized)
- Batch number
- Expiry date
- Optional: national reimbursement or identification number



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Safety features

Unique Identifier (UI) : properties

- A unique code (UI) on each pack
- The UI is carried by a 2D barcode (Data Matrix ECC200)
- Human-readable format
- Minimum printing quality

PC: 09876543210982
SN: 12345AZRQF1234567890
NN: (optional)
Batch: A1C2E3G4I5
Expiry: 032021

Illustrative example – not binding

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Verification of the safety features (I)

- An **end-to-end** verification system – not a full track & trace system
- One end - Manufacturers/MAH:
  - UIs are printed on packs and uploaded in a secure repositories system.
  - ATDs are applied on packs.
- Other end – Pharmacies/hospitals:
  - UIs are systematically verified for authenticity and decommissioned at the time of supply to the public.
  - The integrity of the ATD is checked.

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Safety features

Verification of the safety features (II)

- What happens in the middle of the chain?
- Risk-based verification by wholesalers, who verify the safety features when:
  - The product is not directly supplied from a manufacturing or marketing authorisation holder (or a person supplying on their behalf);
  - The product is returned by another wholesale distributor or a pharmacy.

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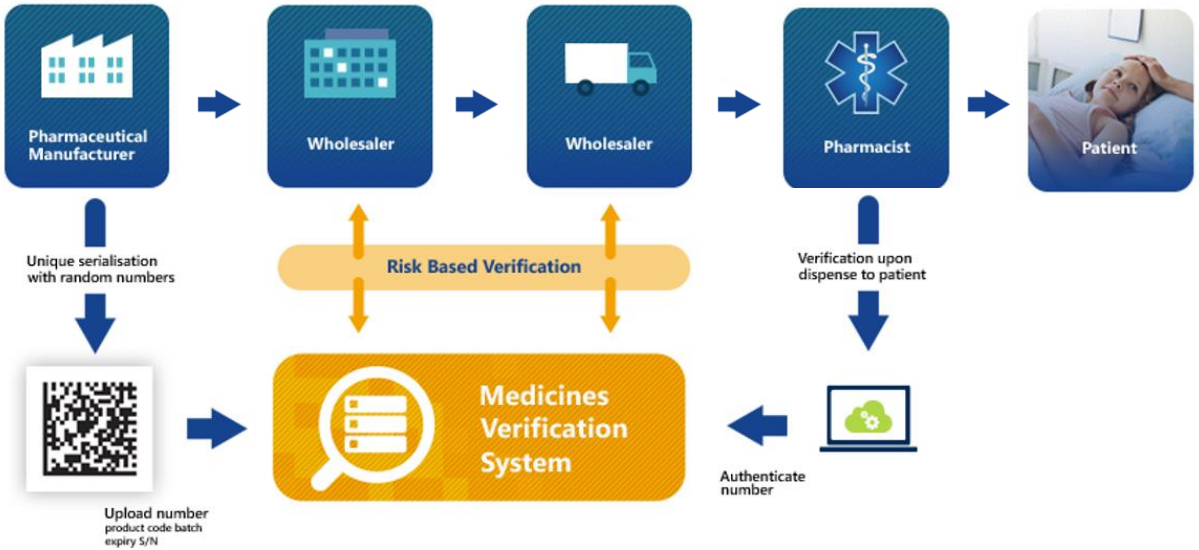
Safety features

Verification of the safety features (III)

- End-to-end verification system
- Risk-based verifications



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Safety features

Verification of the safety features (IV)

- Member States **can exempt** certain persons from the obligations to verify/decommission:
  - Veterinarians, dentists, opticians, paramedics, nursing homes, etc. (full list in Article 23)
  - In this case the verification/decommissioning of the UI is performed by the wholesaler supplying those persons.
- Member States **cannot exempt pharmacies** nor healthcare institutions.

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Safety features

The Repositories system (I - Characteristics)

- Main **tasks**:
  - store the information on the legitimate UIs, and
  - allow the verification/decommissioning of UIs at any point of the supply chain.
- Physically **located** in the European Union.
- Established and managed by **stakeholders**.
- Supervised by **Member States.**
- It **consists** of:
  - a central information and data router ('hub'), and
  - national or supranational repositories connected to the hub.

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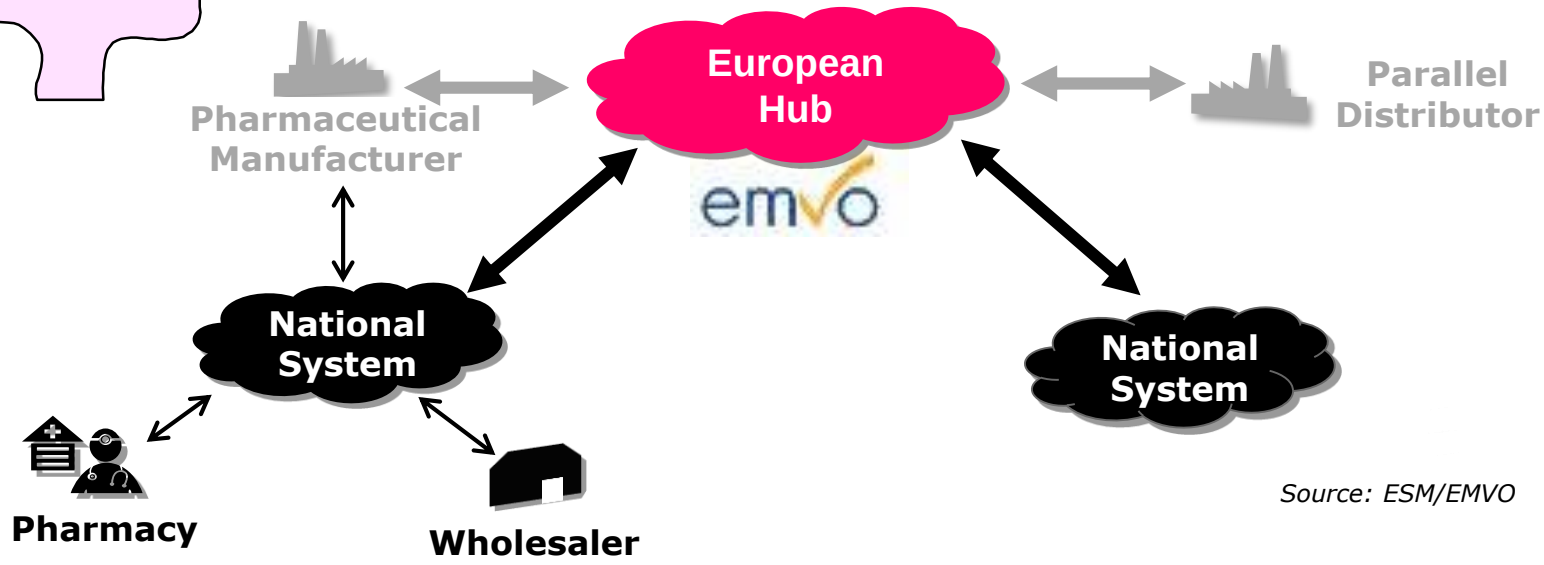
Safety features

The Repositories system (II - Architecture)

- Architecture: a **distributed** system



Source: ESM/EMVO

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Safety features

The Repositories system (III - Access)

- The repositories system can be queried by **verified users**, i.e. users whose identity, role and legitimacy has been verified.
- **National competent authorities (NCAs)** can access the repositories system and the information contained therein for:
  - ❑ supervising the functioning of the repositories
  - ❑ investigating potential incidents of falsification;
  - ❑ reimbursement;
  - ❑ pharmacovigilance or pharmacoepidemiology.

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References

- Q&A published by the Commission: http://ec.europa.eu/health/files/falsified_medicines/qa_safetyfeature.pdf
- Regulatory requirements: Implementation plans published by EMA and CMDh

  CAPs: http://www.ema.europa.eu/docs/en_GB/document_library/Other/2016/02/WC500201413.pdf

  NAPs: http://www.hma.eu/fileadmin/dateien/Human_Medicines/CMD_h_/Falsified_Medicines/CMDh_345_2016_Rev00_02_2016_1.pdf

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Thank you!