



The Global Language of Business

# EU Falsified Medicines Directive (FMD) and Beyond

## Implementation Challenges for a Manufacturer

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Bayer AG

GS1 Global Healthcare Conference, Berlin, 5 April 2017



# Our Mission

## Bayer: Science For A Better Life



# Our Business Areas



## Pharmaceuticals

- Prescription drugs



## Consumer Health

- Over-the-counter medicines, dietary supplements, dermatology products, foot care and sunscreen



## Crop Science

- Innovative crop protection and seeds
- Animal Health

# EU-FMD @ Bayer: Implementation Challenges

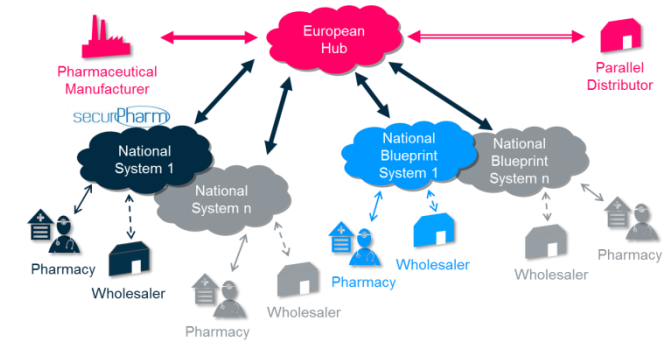
- Ensure **technical readiness** of **100+ parties**
  - ## Bayer-owned manufacturing sites,  
## packaging lines
  - ## Contract Manufacturers (CMOs)
  - ## Bayer-operated warehouses
  - ## Distribution Partners (3 PLs)
  - ## Customers where Bayer acts as Contract Manufacturer (CMO)
- Establish **serialization data exchange** with all **CMOs** and **Customers**
- Establish **exchange** of **regulatory** and **serialization data** with **European Hub**
- **Establish** new / **revise** existing **business processes** for e.g. pack decommissioning, complaint handling, batch recall
- Execute **change process** incl. **regulatory submission** for approx. **4.000 products** (Stock Keeping Units (SKUs))
- Be ready by February 2019



# EU-FMD Readiness – Collaborative Challenge for Pharmaceutical Supply Chain Partners



- **Stakeholders** in EU member states to establish Nat'l Governance Organizations
- **Nat'l Governance Organizations** to select repository system providers
- **Stakeholders** and **Nat'l Authorities** to collaborate and determine coding scheme(s)
- **Manufacturers** to equip packaging lines with serialization and tamper-evidence capabilities
- **Wholesalers** and **3PLs** to adapt IT systems and establish business processes for decommissioning and risk-based verification
- **IT suppliers** to integrate verification in pharmacy Point-of-Sales software
- **Retail pharmacists** and **hospitals** to integrate verification in workflows



**Joint Goal: Make Medicines Verification Happen in EU by Feb. 2019 to Ensure Patients' Access to Safe Medicines**

# SECURPHARM – THE GERMAN SHIELD AGAINST FALSIFIED MEDICINES

securPharm

**PHAGRO**

**BPI** Bundesverband der Pharmazeutischen Industrie e.V.

**ABDA** 

 **WUV**

Bundesverband der Arzneimittel-Hersteller e.V. **B.A.H**

**vfa.** Die forschenden Pharma-Unternehmen

**IFA**

*For video please search for 'securPharm version A' on YouTube*

# What are the Future Coding Requirements in EU Member States + EEA Countries



## Coding of single-country packs in Europe – Some examples

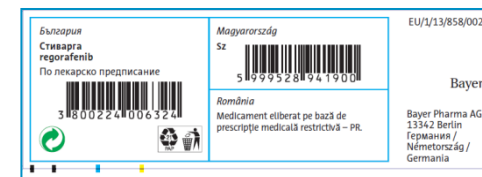
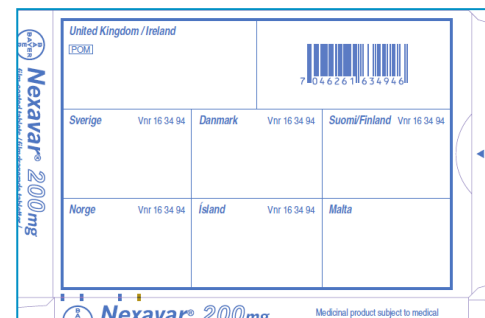
- EAN-13 coding already established in most EU countries
  - Migration path to GTIN-14 pretty straight forward
- Nordics to allow for continued use of NTINs for existing products; as of 2019, new products need 'real' GTIN
- Belgium to transition from national CNK code to GTIN

PC: 04008500018002  
SN: 19067811811  
BATCH BXA6132  
EXP 02/2019



## The 'real' challenge: Coding of multi-market packs

- Easy where packs bear only one EAN code already today
- Germany to allow for GTIN + NHRN (5<sup>th</sup> data element) e.g. for DE-AT packs
- Open topic for packs shared between Spain and Portugal
- ...



Members of GS1 Healthcare are always up-to-date through access to EU-FMD Coding Tracker

# How Can We Avoid Varying Pack Coding Requirements Around the Globe ?



## De-facto Standard

- GS1 DataMatrix encoding four data elements (GTIN, S/N, Batch, Expiry date)
- Some countries continue to require inclusion of nat'l number (e.g. Germany, France, Brazil) via NTIN (Nat'l Trade Item Number) or NHRN (Nat'l Health Reimbursement Number) using AI (7xx)

## However

- China has introduced proprietary non-GS1 coding
- Countries consider/request to add information to code (e.g. pack size, tax code, manufacturer name, ...)
- Challenge for manufacturers who need to upgrade and re-qualify equipment; space restrictions on packs do not allow for extensive extension of encoded information

**Consider to join GS1 Healthcare to benefit from advocacy of GS1 Healthcare and GS1 member organizations for de-facto standard**



# How Should MAH's Distributors (3PLs) Connect to Verification Landscape?



## Problem Statement

- 3<sup>rd</sup> Party Logistics Providers (3PLs) need to perform verification and decommissioning activities on behalf of Marketing Authorization Holders (MAHs)

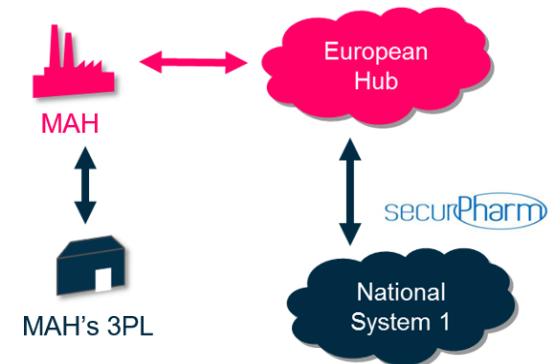
## Question

How should 3PLs connect to nat'l verification system (NMVS)?

Remote Access via MAH system and European Hub	<ul style="list-style-type: none"> <li>3PL transactions recorded under MAHs identity</li> <li>3 PL to build interface for each MAH he is working with</li> </ul>
Direct Access to NMVS via 3PL wholesaler account	<ul style="list-style-type: none"> <li>Less systems involved i.e. quicker response times</li> <li>3 PL only needs one access channel to nat'l system</li> </ul>

## Answer

Direct access is preferred model envisaged by EMVO URS



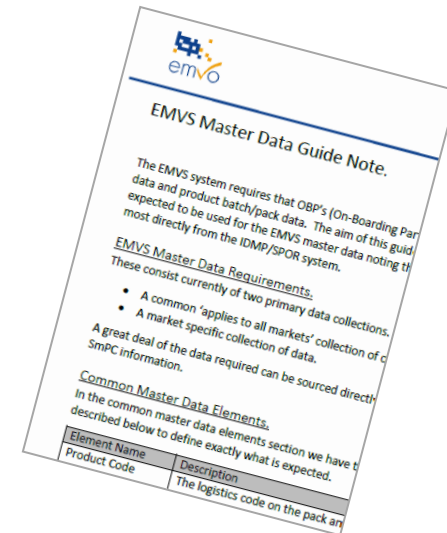
**GS1 Healthcare Public Policy workgroup provides access to network of company experts for experience exchange**

# How are Master Data Reqs. set forth in Delegated Regulation to be Understood?



## Problem Statement

- EU Delegated Regulation 2016/161 sets forth requirements on master data reporting e.g.
  - Product Name, Common Name, Strength, Pharmaceutical Form, Pack Type
  - Article 57 code / PCID
  - List of 'Designated Wholesalers'



## Question

- What does this all mean, and from which source can MAH retrieve this data?

## Answer

- Most of required data can be found in regulatory submission / xEVMPD / IDMP
- Guidance will be provided in Master Data Guidance by EMVO (European Medicines Verification Organization); publication expected in June 2017

**GS1 Healthcare Public Policy network of experts provides access to recent information regarding EU-FMD implementation**

# Can Linear Barcode be Dropped upon Introduction of 2D DataMatrix Code?



## Problem Statement

- GS1 DataMatrix code and accompanying information requires additional space for printing on outer packaging
- Space is restricted in particular on small packages

## Question

- Can linear barcode be dropped upon introduction of 2DMC to free up space on outer packaging?

## Answer

- Clear tendency by industry to keep existing linear barcode for interim period until Feb. 2019 (and drop it afterwards as part of any forthcoming change)
- Rationale: Stakeholders are only obliged as of Feb. 2019 to be capable to read 2 DMC; dropping linear barcode will pose problems to non-equipped parties

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# Long Way Already Passed – Challenging One Still Ahead



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**It's Definitely Worth to Consider a GS1 Healthcare Membership – Feb. 2019 is Nearby But it's Never too Late !!!**

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