Plain Language Labelling Industry Perspective

Rocelyn DelCarmen
Director, Regulatory Affairs and Quality Assurance
AstraZeneca Canada Inc

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Presentation Outline

- The PLL Journey for Industry
- Impact on Industry
- Next steps

The PLL Journey for Industry

- Beneficial to have standardized consumer information
- Ensure Canadians receive approved Canadian drug information
- Approved labelling publically accessible (e.g. on-line); more easily found on HC's website
- Shift from paper media to electronic media

Concerns raised where testing was unique for Canada and over and above testing requirements in US and EU

- Electronic accessibility of product information
- Approved labelling at dispensing
- Substantial costs of proposals not accounted for in RIAS
- Provision of mock-ups time consuming and resource intensive

Extended implementation period to 1-year (vs 6 months)

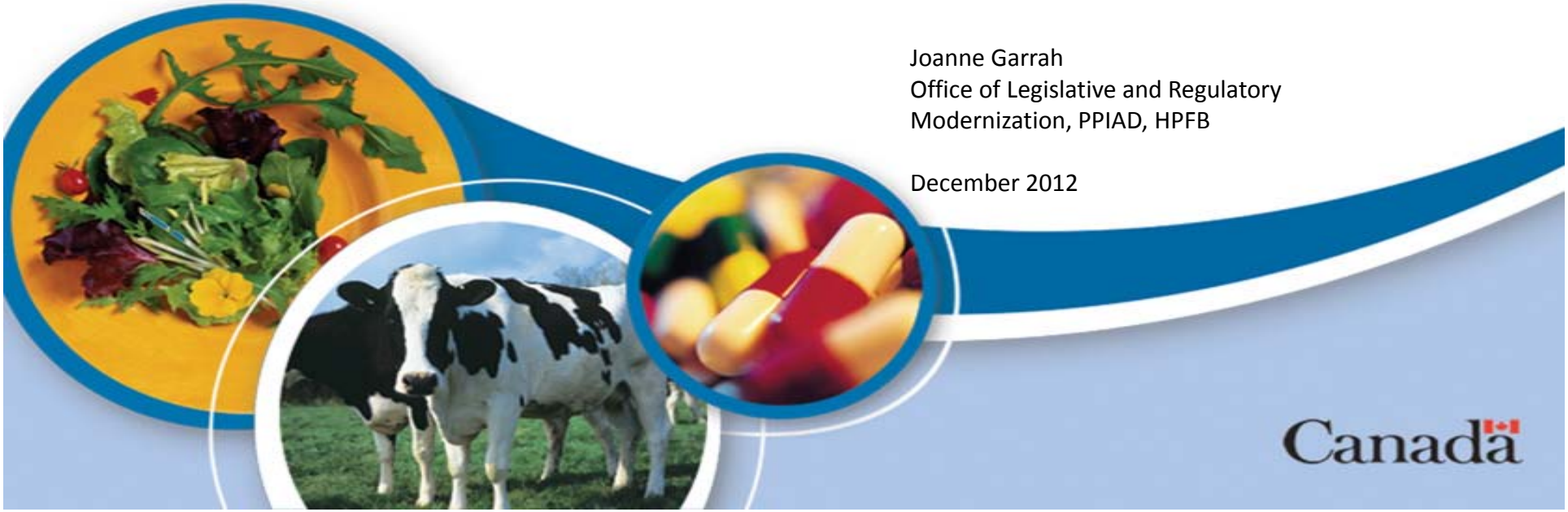
Through bilateral interactions continue to provide feedback

Health Canada Santé Canada

Your health and safety... our priority. *Votre santé et votre sécurité... notre priorité.*

PLAIN LANGUAGE LABELLING INITIATIVE

Easy to Read... Easy to Understand... Easy to Access



Joanne Garrah
Office of Legislative and Regulatory Modernization, PPIAD, HPFB

December 2012

Canada

Plain Language Labelling Initiative

Objectives:

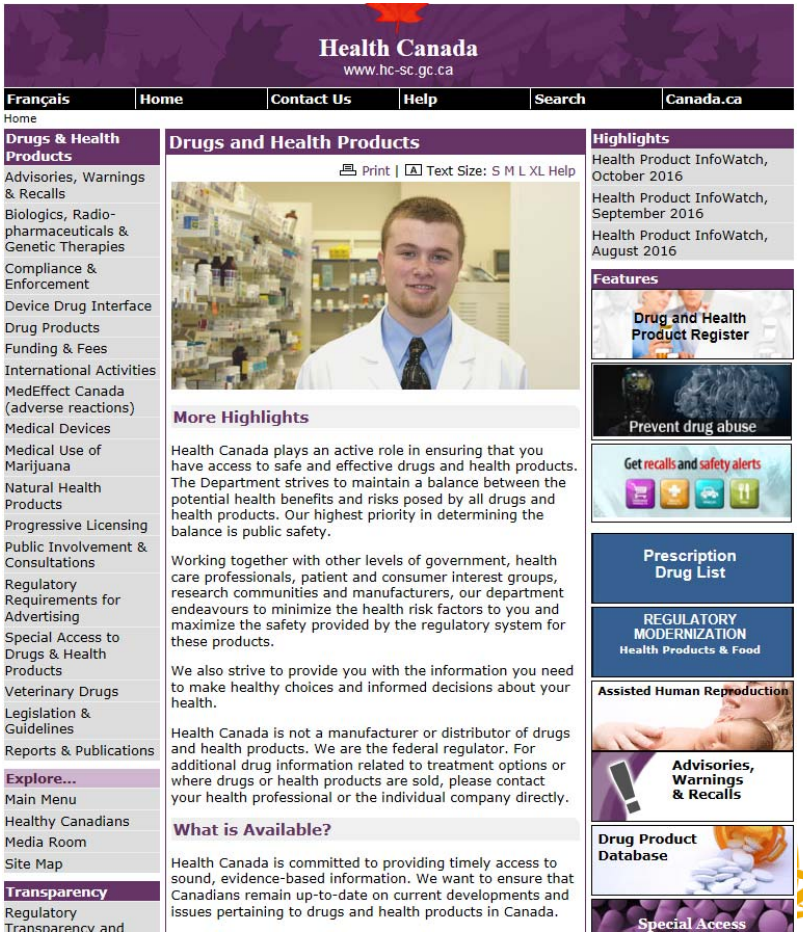
- **reduce preventable** medication errors
- **improve safe and effective** use of drugs
- support Canadians in making **informed choices** about drugs

To be achieved through:

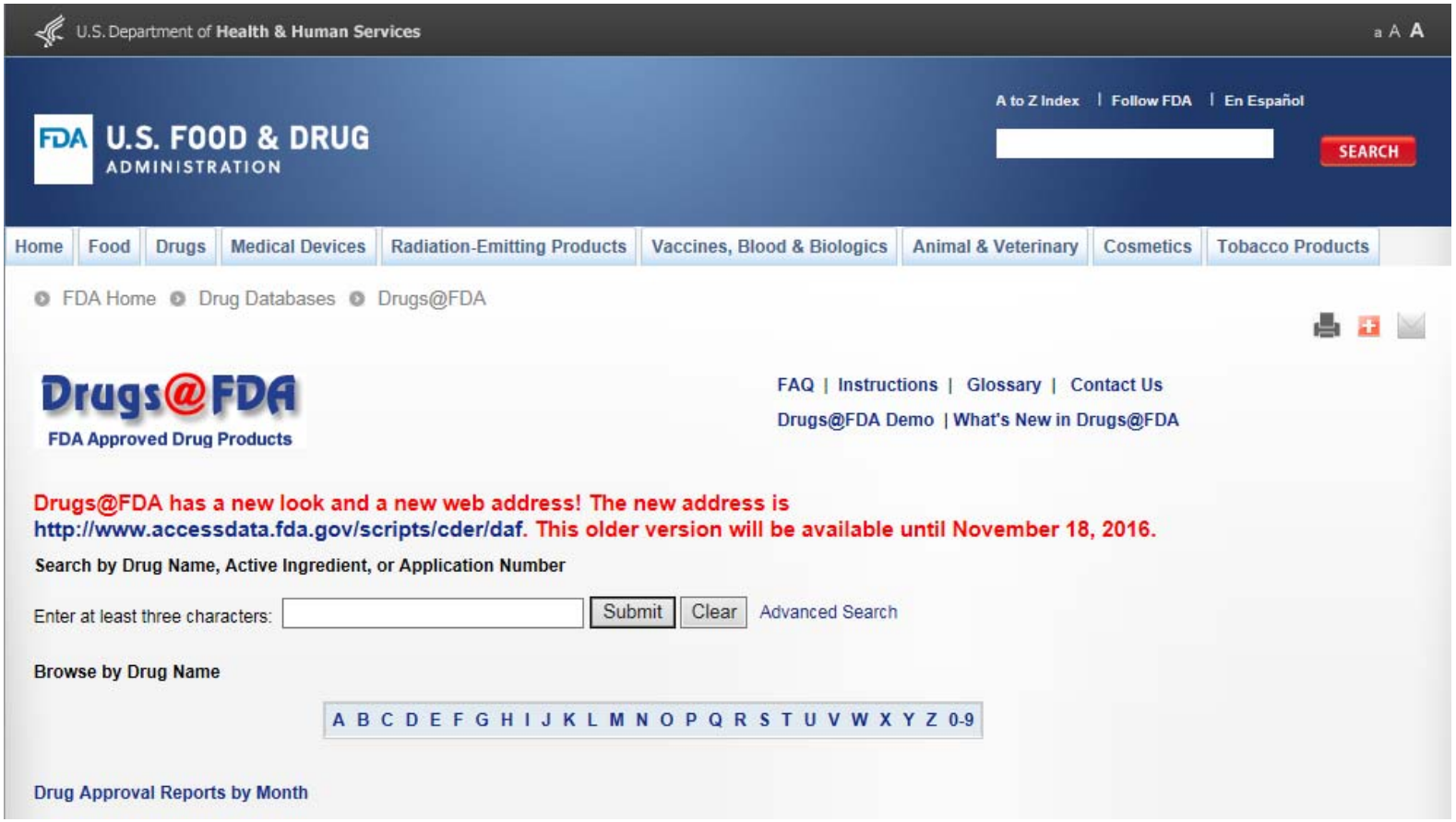
- **plain language** improvements to labels and packages
- increasing **accessibility and tailoring** of labels for health professionals and consumers
- increasing **consumer awareness** - how labels are read

System-wide collaboration will be key to the success of this initiative, and Health Canada will also look to international counterparts to draw upon best practices and experiences, and align where possible.

Google Search Term: Drugs Health Canada



Google Search Term: Drugs FDA



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Regulatory Impact Analysis Statement (RIAS)

- The submission of mock-ups would not theoretically require additional work on the part of the Sponsor
  - Timing change
  - Reduce procedural steps during review

- LASA – policy in effect since 2006. Industry anticipating updates.
  - Void of stating any additional/incremental cost for Sponsors

- Reduction in
  - Preventable medication errors caused by drug's name, label, package
  - Number of ER visits, hospitalizations, lengths of stays
  - Reduce morbidity and mortality linked to ADR
  - Reduce dispense error rate in community pharmacies
  - Reduce number of tort cases related to medication errors

"The issue of preventable medication errors is recognized as being a complex and system-wide concern…"

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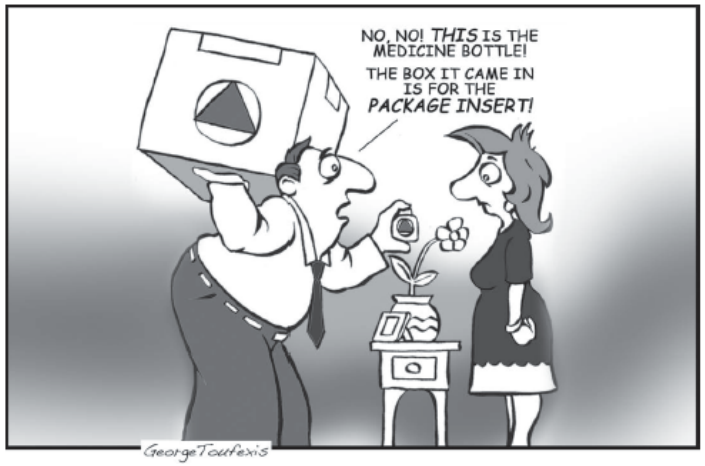
Industry's Key Comments

- Ensure Canadians receive approved Canadian labelling
- Approved labelling available in Central repository, accessible from trusted source
- Shift from paper formats to electronic media
- Harmonize requirements
- Eliminate/minimize non-value, resource intense implementation elements

Milestone	Q&A pre-v1	Q&A v1	Q&A v3	Q&A v4
Filing	• Brand Name Assessment • Contact information on inner and outer label • Bilingual Inner and Outer label mock-ups for each product size and configuration • Bilingual PM • Bilingual PI	• Brand Name Assessment • Contact information on inner and outer label • Bilingual Inner and Outer label mock-ups for representative size and configuration • Unilingual (NDS only) or Bilingual PM • Unilingual (NDS only) or Bilingual PI	• Brand Name Assessment • Contact information on inner and outer label • Bilingual Inner and Outer label mock-ups for representative size and configuration (NDS, SNDS, ANDS, SANDS, DINA, DINB) • Inner and outer label, PM, PI annotated written text (NC and PDC) • Unilingual (NDS only) or Bilingual PM • Unilingual (NDS only) or Bilingual PI	• Brand Name Assessment • Contact information on inner and outer label • Bilingual Inner and Outer label mock-ups for representative size and configuration (NDS, SNDS, ANDS, SANDS, DINA, DINB) • Inner and outer label, PM annotated written text (NC and PDC) • No PI for NC and PDC • Unilingual (NDS only) or Bilingual PM • Unilingual (NDS only) or Bilingual PI
Within **15 days** of review acceptance	None – all at filing	• 2nd language PM (NDS only) • 2nd language PI (NDS only)	• 2nd language PM (NDS only) • 2nd language PI (NDS only)	• 2nd language inner/outer labels (NC, PDC) • 2nd language PM (NDS, NC, PDC) • 2nd language PI (NDS only)
Prior to approval	• Final Bilingual Inner and Outer label mock-ups • Bilingual PI • English PM	• Final Bilingual Inner and Outer label mock-ups • Final English PI mock-up • English PM	• Final Bilingual Inner and Outer label mock-ups • Final English PI mock-up • Final English PM	• Final Bilingual Inner and Outer label mock-ups • Final English PI mock-up • Final English PM
After approval	Within 10 days • French PM	Within 10 days • French PM • French PI	Within 10 days • French PM • French PI	Within 20 days • French PM • French PI



R&D

Standard process for Inner/Outer Label Mock-up

Process #1: Create content
To develop text only draft:
-Company Label standard (e.g. logos, unique ID)
-Local Regulatory Requirements

Multiple reviews
2-3 weeks
Multiple reviews
4-8 weeks
2-4 weeks

Process #2:
Approve content
Text only label reviewed by Global

Process #3: Translation
-External vendors typically used
-Starts after text approved by Canada/Global

Process #4
Mock-up creation
-Central Graphics typically used
-Requires several iterative reviews

Producing a translated label mock-up takes at least 8-15 weeks

Overall process from the industry to the wholesalers

- New or modification to artwork
- Artwork Design
- Submission to Health Canada
- Approval
- Translation
- Creation of the artwork
- Validation and approval
- Printing
- Storage / inventory management
- Production of finished product
- Storage / inventory management
- Release and distribution

3 to 40 months

SANOFI

Package Label Elements – Reviewer comments

"...remove the trademark information... not required by the regulations, nor is it considered essential information for the consumer..."

"...to make space, please remove the bar code / QR code..."

"...remove the product logo..."

"...to minimize visible distraction, remove/change these colours..."

"Reduce the space allocated to the expiry"

"...adopt one of the acceptable expiry date formats as noted in GLLG.."

"... the colour scheme on the label does not match the color of the tablets..."

"...to meet a font size, remove directions such as "do not split the tablet..."

Sponsors: Difficult to implement these types of requests

DOCUMENT REVISION HISTORY

File name	Guidance Document Questions and Answers: Plain Language Labelling Regulations	**Replaces**	not applicable
Date Adopted **Effective Date**	2015/04/30 2015/06/13	**Date Adopted** **Effective Date**	not applicable not applicable

Version	Location of Change	Change Made	Effective Date
1	not applicable	Initial Issuance of Guidance	2015/06/13
2	Section 2: Mock-up Requirement Clarification around DIN-As and DIN-Bs	Removal of Notifiable Change (NC) and post-authorization Division 1 Change (PDC) submissions from the mock-up requirement	2016/02/02
3	Section 2: Mock-up Requirement	Clarification around the submission of annotated text for Notifiable Changes.	2016/04/12
4	Section 2: Mock-up Requirement	• Reorganization of section on mock-ups • Inclusion of text on recommended font size for labels and package inserts • Addition of requirement to declare font size and style for labels and to provide a rationale, if expected font size is not met • Removal of requirement to submit package inserts for Notifiable Change/Post-authorization Division 1 Change submissions	2016/09/08
5	Appendices	Addition of guidelines on	2016/09/08

Revisions to Q&A: PLL Regulations

- Relaxed requirements for NC and PDC
  - No PI at time of filing
  - Labels (annotated text or mock-up) at filing, only if significant changes

- Timing of submission for 2nd language PM and PI for NDS
  - Accepted during screening
  - Final accepted post-approval

- Post-approval submission of 2nd language PM and PI
  - Accepted 20 days post-approval

- Creation of abbreviated Package Insert

Impact on Industry

- Delays to submissions in Canada
  - Notifiable Changes – *alleviated by Q&A Sept 2016 update*
  - SNDS response to Advisement Letter
- Increased artwork demand
- Increased translation demand
- Increase to new product introductions costs in Canada
- Global-Canada process and governance changes for labelling and package change control

Industry's Ongoing Challenges

Ongoing Challenge	Suggestions
Expiry date format	Flexibility for currently approved products and site formats
Font size	Focus on overall legibility
Package Insert Mock-ups	Shift to electronic media and away from paper based format
When to submit 2nd language labels	• Remove filing requirement • Provide 20 days post-approval • Availability evaluated during Inspections

Next steps

- Continue to provide feedback on PLL implementation
- Explore options for electronic consumer information
- Evaluate effectiveness of PLL after years of implementation
  - Assess against RIAS:
    Has medication errors linked to brand name, label, package decreased?

Labelling Information – many types

Rx bottle

Package insert

Product Monograph Part III – Consumer Information

THE INFORMATION FOR THE CONSUMER

Loboris LEUCOVORIN
calcium folinate tablets

This leaflet is designed specifically for Consumers. This leaflet is a summary and will not tell you everything about Loboris Leucovorin Calcium. Contact your doctor or pharmacist if you have any questions about the drug.

ABOUT THIS MEDICATION

What the medication is used for:

The medication is used -
a) To diminish the toxicity and counteract the effect of impaired METHOTREXATE elimination.

b) To treat the megaloblastic anemias due to folate deficiency, as in sprue, nutritional deficiency, megaloblastic anemias of pregnancy and infancy.

What it does:

LEUCOVORIN is a reduced form of folic acid. LEUCOVORIN limits METHOTREXATE action on normal cells by competing with METHOTREXATE for the same transport processes into the cell. LEUCOVORIN rescues bone marrow and gastrointestinal cells from METHOTREXATE but has no apparent effect on pre-existing METHOTREXATE nephrotoxicity.

When it should not be used:

Do not take LEUCOVORIN
- If you are allergic (hypersensitive) to calcium folinate or any of the other ingredients of LEUCOVORIN OR
- If you have megaloblastic anemia due to Vitamin B_{12} deficiency

What the medicinal ingredient is:

LEUCOVORIN Calcium (also known as calcium folinate).

What the important nonmedicinal ingredients are:

Non-medicinal ingredients are: Lactose, Magnesium Stearate, Microcrystalline Cellulose, Sodium Starch Glycolate and Starch Pregelatinized 1500.

What dosage forms it comes in:

Tablet: 5 mg **LEUCOVORIN as LEUCOVORIN calcium**

WARNINGS AND PRECAUTIONS

In very rare cases sloughing of the skin, rarely leading to death, has been reported in patients receiving Leucovorin along with other medications known to have similar side-effects.

Leucovorin should only be used under the direct supervision of a clinician experienced in the use of cancer chemotherapeutic agents.

BEFORE you use LEUCOVORIN talk to your doctor or pharmacist if:
- You have symptoms of gastrointestinal disorders.
- You are taking cytotoxic drugs (hydroxycarbamide cytarabine, mercaptopurine, fluoguanine).
- You are epileptic and are being treated with phenobarbital, primidone, phenytoin and succinimides.
- If you are Pregnant or Nursing.

INTERACTIONS WITH THIS MEDICATION

LEUCOVORIN can interfere with the breakdown or metabolism of certain drugs. In particular, you should inform your doctor if you are taking any of the follow ing:

- Cytotoxic drugs - 5-fluorouracil (5FU), Methotrexate (High doses of LEUCOVORIN may reduce the efficacy of Methotrexate. LEUCOVORIN may enhance the toxicity of fluorouracil.)
- Folic acid antagonists – cotrimoxazole, pyrimethamine
- Anti-epileptic substances - phenobarbital, primidone, phenytoin and succinimides.

PROPER USE OF THIS MEDICATION

Usual dose:
Take your dose as prescribed by the physician.

Overdose:

If you take too much LEUCOVORIN (Overdose):
- Immediately call your doctor or go to the nearest hospital emergency department
- Do this even if you have no signs of discomfort
- Always take the labelled medicine bottle with you, even if it is empty

Missed Dose:
Not Applicable.

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3rd Party Drug info sheet

Before-N-After

Drug Information Sheet: Phentermine & Phendimetrazine

What is Phentermine ? What is Phendimetrazine?

These medications are prescription medications that decrease your appetite, however, they are not Fen-Phen. Fen-Phen was a combination of two medications that were also used to control appetite but because of serious side effects, Fen-Phen was taken off the market years ago. For more information on Fen-Phen, see the Fen-Phen section of this document.

Phentermine and Phendimetrazine are also known as "anorectics" or weight loss medications. Because they help clients make dietary changes, Before-N-After providers may prescribe them as an initial supplement to diet and exercise in weight management and weight loss.

What are the possible side effects of Phentermine?

As with any medication, these medications may cause side effects. However, because Before-N-After uses low doses of these medications, side effects are rare. Many of our patients appreciate the conservative dosing and do not experience the "jitteriness or insomnia" experienced with other programs. Although extremely rare, the following is a list of serious side effects that may occur:

- an allergic reaction (difficulty breathing, closing of your throat, swelling of your lips, tongue, or face, or hives);
- chest pain, shortness of breath, or irregular heartbeat;
- severe headache, dizziness, blurred vision or high blood pressure; or
- hallucinations, abnormal behavior, or confusion.

Other, less serious more common side effects may occur. Continue to take Phentermine and talk to your doctor if you experience:

- restlessness or tremor;
- nervousness or anxiety;
- difficulty sleeping;
- dry mouth;
- diarrhea or constipation;
- impotence or changes in your sex drive; or
- irritability.

What is the most important information I should know about these medications?

These medications may hide the symptoms of extreme fatigue. So, they should not be used as an energy pill.

You cannot take these medications if you:

- have heart disease or uncontrolled high blood pressure;
- have arteriosclerosis (hardening of the arteries);
- have glaucoma;

Website Drug Page (1)

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Questions