

Aventis Pasteur



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 02N-0204

Bar Code Label Requirements for Human Drug Products [67 FR 41360, June 18, 2002]

09 August 2002

Dear Sir/Madam:

Aventis Pasteur Inc. of Swiftwater, Pennsylvania thanks the Food and Drug Administration for the opportunity to comment on the above-referenced proposed rule entitled "Bar Code Label Requirements for Human Drug Products" for the development of a regulation on bar code labeling for human drug products, including biologic products. Aventis Pasteur Inc. is part of the Aventis Pasteur family of companies, which consists of the parent firm Aventis Pasteur SA, headquartered in Lyon, France, Aventis Pasteur Inc., and other subsidiaries (collectively Aventis Pasteur). In turn, Aventis Pasteur SA is a subsidiary of Aventis SA.

Aventis Pasteur is a world leader in vaccines and produces more than one billion doses of vaccines every year to immunize 400 million people around the world. Aventis Pasteur provides the broadest range of human vaccines and biologicals commercially available from any single U.S. vaccine company. It is a leading supplier of vaccines to protect against influenza, diphtheria, tetanus, pertussis, polio, Japanese encephalitis, yellow fever, *Haemophilus influenzae* type b disease, meningitis, rabies, and typhoid fever. Aventis Pasteur, in close consultation with the U.S. public health establishment, including the U.S. Food and Drug Administration (FDA), and the Centers for Disease Control and Prevention (CDC), strives to alleviate the suffering and death of vaccine-preventable diseases.

We offer the following comments for your consideration as they apply to the biologics (vaccine) industry:

A. General Questions Related to Drugs and Biologics:

Should blood products and vaccines carry a bar code?

We believe that the application of bar codes to hospital-administered medicinals could aid in the reduction of many medication errors. It is our determination, however, that applying bar codes on vaccine labeling will have minimal beneficial impact as the vast majority of vaccines are administered in physician's offices where scanning equipment and systems are not readily available.

02N-0204

C17

In addition, there is concern that including bar codes on vaccine labeling will increase the potential of disrupting vaccine production lines, particularly if there is a need for in-line printing. Given the fragile nature of vaccine supply and recent shortages of a number of vaccines, there is concern that any additional disruptions could exacerbate this situation.

What information should be contained in the bar code? What do you consider to be critical bar code information that will reduce medical product errors?

In the event there is a determination that it is a necessity to implement bar coding on unit-of-use container labels for the reduction of medical errors, we identify the National Drug Code (NDC) as the only key element that will support this objective. The NDC contains the essential components (manufacturer, product, and dosage) for such an initiative. Lot number and expiration date are variable elements that are not necessarily related to reduction in medication errors. As stated above, the addition of variable elements to the bar code will have an impact on current vaccine production lines. Increased lead times can potentially alleviate some of these issues. However, for vaccines such as influenza, a vaccine that is comprised of 3 different viral strains each year with minimal time allotted to identify the strains and begin production on the vaccine, any such mandate could have a major impact on the availability of the vaccine in the marketplace.

Considering current scanners and their ability to read certain symbologies, should the rule adopt a specific bar code symbology (e.g., reduced space symbology (RSS) and 2-dimensional symbology)?

We would like to point out that a significant portion of all vaccines supplied to market is in single-dose presentations. Based on current space constraints for single-dose container labels, we support the vaccine manufacturer's recommendation for the preference of the 2-dimensional bar code symbology (i.e., Data Matrix). Along with the reduced size of this symbology, Data Matrix symbology is imbedded with error detection and correction capabilities to ensure absolute read accuracy. We believe the RSS technology will create difficulties based on its larger size. It is important to note that although it has been stated that this technology has been tested, it has not been tested within the confines of an actual production line to determine any potential impact on actual production lines, and to validate the ability to maintain production at current speeds.

Assuming that we require bar codes on all human drug products, where on the package should the bar codes be placed? Are there benefits to placing bar codes on immediate containers, such as the bottles, tubes, foiled-wrapped tablets, and capsules, found inside prescription or OTC product cartons?

A benefit could be identified by having a consistent location for bar codes on all human drug products; however, current space constraints may make it difficult for labeling manufacturers to comply. Based on this actuality, we request that a specific location not be identified or required.

What products already contain bar codes?

Aventis has implemented Universal Product Codes (UPC) bar coding on all package cartons. This has been made possible because of space availability. These UPC bar codes presently contain the NDC number. This UPC code included on cartons is incorporated and validated during the printing process as opposed to on the production line. If variable data were required, the bar code would have to be integrated into the production line.

B. Medical Device Questions (Not applicable to biologics)

C. General Questions and Economic Impact Questions

Will bar code printing costs cause you to modify your packaging choices, such as reconsidering the use of blister packages or influencing future package choices? If so, how?

We conclude that it is a possibility that future package choices can be influenced by the final rule and requirements of this proposal. Our single-dose container labels have very limited space; therefore, if larger bar code symbologies are mandated along with additional variables required, we may have to produce only larger volume presentations in order to comply with the new regulations. However, as stated previously, in the vaccine industry the current move has been to single-dose presentations in order to reduce/eliminate the need for certain preservatives.

Have you implemented bar code technology in your product line? If so, what elements and symbology are included in the bar code?

In order to comply with regulatory compliance requirements, Aventis Pasteur packaging product lines have implemented bar code verification systems on the packaging production line, which use Code 128 bar coding symbology. This system verifies that the correct package is on the packaging product line by visually scanning for a specific and unique control number.

If you manufacture and bar code products, how do verification requirements for bar codes affect your ability to add bar codes? How much bar code verification is appropriate as part of the quality system?

An automated system will have to be put in place and validated to ensure compliance and accuracy associated with the vaccine information entry. Automating the process is a requirement to limit the opportunity for human error. The system will be required to impart information to the containers at speeds up to 350 containers per minute and must be capable of integration to pressure sensitive labelers or packaging production lines. Such systems, when obtainable, will be costly and technologically difficult to implement.

Can bar codes be produced with a dose specific unique identifying number, lot number, and expiration date at your highest production line speeds?

No. Based on our existing packaging lines and current technology available, we are unable to produce bar codes on container labels at the production line level. We anticipate the ability to apply bar codes on our container labels in the future, which include a specific unique identifying number, such as the NDC number, using a 2-dimensional symbology. This perception is based on the potential to apply such a bar code prior to the packaging line process. We foresee the inclusion of lot number and expiration date to inhibit the supply of vaccines, as it will increase production lead-time. Also, the ability to verify the information contained in the bar code on the production line may further reduce production times. We support further evaluation of the need and technical feasibility for incorporating lot number and expiry dates within bar codes.

What equipment solutions are vendors offering to manufacturers for bar coding or scanning? How quickly can such systems run? What type of packaging line is equipment used for?

We have been consulting with suppliers and vendors to determine the availability of various systems to support this initiative, but possible solutions have not been established. We have identified Data Matrix as a possible solution for bar coding the NDC number, but when it comes to including variable information, there are no solutions.

What is the expected rate of technology acceptance in all health care sectors of machine-readable technology? What are the major inhibiting factors to the current use of machine-readable technologies?

Since the majority of vaccine administration is performed in the physician's office, where scanning equipment and machine-readable technologies are not readily available, the rate of technology acceptance in the vaccine health care sector will not be as expeditious to implement as it may be in other health care sectors. In fact, currently there is a wide range of computer technologies in individual physician offices. Gaining wide physician uptake and expending of considerable funds to purchase specific reading equipment, computer hardware, and software to implement bar coding at the point of use would be a major undertaking and not likely to happen unless there were a concurrent mandate for physicians to use the information on the bar code.

Assuming a final rule is issued requiring bar coding, when should it become effective? For example, would some industries or products require more time than others to comply with a bar coding requirement? Would a certain compliance time sharply reduce costs of relabeling?

To effectively comply with a final rule issuing bar coding on container labels, we would prefer more of a phased-in approach in order to adequately meet the new regulations and avoid any potential impact on the fragile area of vaccine supply. We could implement the NDC number within 1-2 years, but the addition of variable information would require improved technology for manufacturers as well as additional, affordable technology for physician offices, which would require further time.

Aventis Pasteur



On behalf of Aventis Pasteur Inc., we appreciate the opportunity to comment on this proposed rule regarding Bar Code Label Requirements for Human Drug Products and thank you for your consideration of these comments. Should you like to discuss any of our comments or concerns further, please address inquiries directly to Kenneth P. Guito, Director, Regulatory Policy and Intelligence, by telephone at (570) 839-4212, or by facsimile at (570) 839-5529, or by email at ken.guito@aventis.com.

Sincerely,

A handwritten signature in black ink that reads "Kenneth P. Guito".

Luc Kuykens, MD, MPH, DTM
Vice President, Regulatory Affairs, North America
and Authorized Official

LK/KPG/kh

From: KIM HENDERSON (570)839-4637
AVENTIS PASTEUR
DISCOVERY DR

SWIFTWATER, PA, 18370

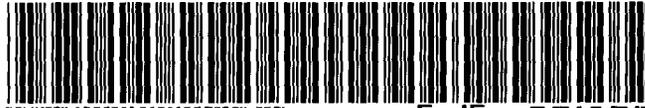
REVENUE BARCODE



To: Dockets Mgt Branch HFA-305 (301)827-0373
Food & Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD, 20852

SHIP DATE: 09AUG02
WEIGHT: 1 LBS

Ref: 317588.6248300



DELIVERY ADDRESS BARCODE(FEDEX-EDR)

TRK # 7905 8088 3794 ^{FORM} 5201

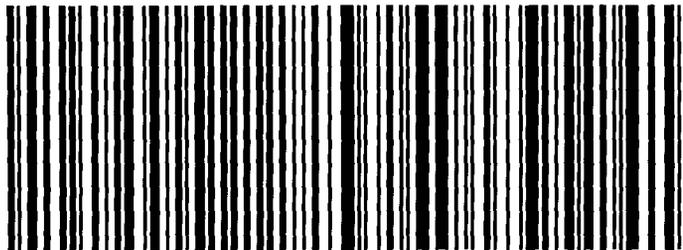
FedEx PRIORITY OVERNIGHT
IAD

MON
A2

Deliver by:
12AUG02

20852-MD-US

ZM GAIA



Shipping Label

Schedule Courier	Find a Dropoff Location	Shipping History
Shipment Complete	Cancel Shipment	Edit Shipment Information

1. Use the "Print" feature from your browser to send this page to your laser printer.
2. Fold the printed page along the horizontal line.
3. Place label in air waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and sc

Shipment Details

To print a copy of the shipment information for your records, please click "Shipment Details".

Shipment Details

Ship a New Package

Ship Inside U.S.	Ship Outside U.S.	Ship to Same Recipient
------------------	-------------------	------------------------

Use of this system constitutes your agreement to the service conditions in the current FedEx service Guide, available upon request
FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide.