

Statement on the Use of RFID on Pharmaceuticals

Radio Frequency Identification (RFID) is an item tagging and tracking technology which has the potential to jeopardize consumer privacy, reduce or eliminate purchasing anonymity, and threaten civil liberties. We are opposed to the use of RFID tags on or in prescription medicines and medicine packaging that are dispensed to consumers, except in cases where consumers explicitly request the live tags for their own purposes. Except in those limited cases, the use of RFID tags should be restricted to bulk packaging and shipping containers, and should not be placed on or in individual pills or drug packaging that could be dispensed directly to consumers.

Threats to Privacy and Civil Liberties

While there are beneficial uses of RFID, some attributes of the technology could be deployed in ways that threaten privacy and civil liberties:

1. Each RFID tag has a unique identification number that acts like a Social Security number for things. These numbers can be associated with the people purchasing or carrying tagged objects. Such linkage could lead to a global "item registration system" where the ownership trail of items like prescription drugs could be recorded in a database and used to monitor people's travels and activities. Even if item-level information remains generic and does not disclose information about the product, it would still be possible to identify people through the unique identification numbers emitted by the tags in order to associate people with events like political rallies.
2. RFID tags can be read from a distance by anyone with the appropriate reader device. These scans could occur through people's clothes, wallets, backpacks, purses, or pharmacy bags--without their knowledge or consent. Even if RFID tags are encrypted, there is no protection against abuse by "authorized" individuals and organizations who could glean the unique identification numbers from items, like prescriptions, for their own ends.

The potential for abuse by such authorized parties and the government is amply illustrated in an IBM patent application titled "Identification and Tracking of Persons Using RFID-Tagged Items." In this patent application IBM details how corporations can use the RFID tag numbers on items to learn the exact identity of an individual and identify his belongings in order to deliver targeted advertising. The patent application also spells out how RFID tags on carried items could enable the government to track people in public places like shopping malls, sports arenas, airports, libraries, museums, elevators, and even restrooms.¹

3. RFID tag readers can be hidden and incorporated into nearly any environment where human beings or items congregate. RFID readers have already been experimentally embedded into floor tiles, woven into carpeting and floor mats, hidden in doorways, and seamlessly incorporated into retail shelving and counters, making it virtually impossible for a consumer to know when or if he or she was being "scanned."

Use of RFID in the Supply Chain

We do not oppose the use of RFID tags in the pharmaceutical supply chain, *i.e.* from the point of manufacture to the point of dispensing. This approval is contingent upon evidence that the electromagnetic energy emitted by the reader devices does not adversely affect the efficacy, potency, or safety of the drugs exposed to it.

We recommend that independent studies be commissioned to determine the effect of the electromagnetic energy on those within range of the reader devices, like warehouse employees and pharmacists. RFID readers emit electromagnetic energy over wide swaths. Medical researchers have begun to raise questions about the long-term health effects of this type of chronic exposure to low levels of electromagnetic radiation.

RFID tags could help ensure that pharmaceuticals are not counterfeit, that they are handled properly, and that they are dispensed appropriately. However, RFID is not a foolproof way of ensuring the pedigree of drugs. We anticipate the technology will open up new avenues of criminal enterprise due to the ease with which RFID technology can be defeated. Relying on the technology alone to protect the legitimacy of pharmaceuticals would be ill advised.

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1. Katherine Albrecht and Liz McIntyre, "Spychips: How Major Corporations and Government Plan to Track Your Every Move with RFID," Nelson Current, 2005, p. 33-35.

Other references:

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<<http://www.privacyconference2003.org/resolutions/res5.DOC>>.

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<[http://www.privacyinternational.org/article.shtml?cmd\[347\]=x-347-82586&als\[theme\]=Privacy%20and%20Human%20Rights&headline=PHR2004#_Toc458240180](http://www.privacyinternational.org/article.shtml?cmd[347]=x-347-82586&als[theme]=Privacy%20and%20Human%20Rights&headline=PHR2004#_Toc458240180)>.

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