

COMMISSION DELEGATED REGULATION (EU) 2016/161 Falsified Medicine Directive (FMD)

November 2017

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Falsified Medicine Directive (FMD)

Requirements

Packaging level: Secondary Packaging. Aggregation is volunteered

Tamper Evident solution: tbd

Data elements:

PC Product Code (GTIN/ NTIN)

SN Serial Number

EXP

Lot Lot Number

NN National Reimbursement Number (if applicable)

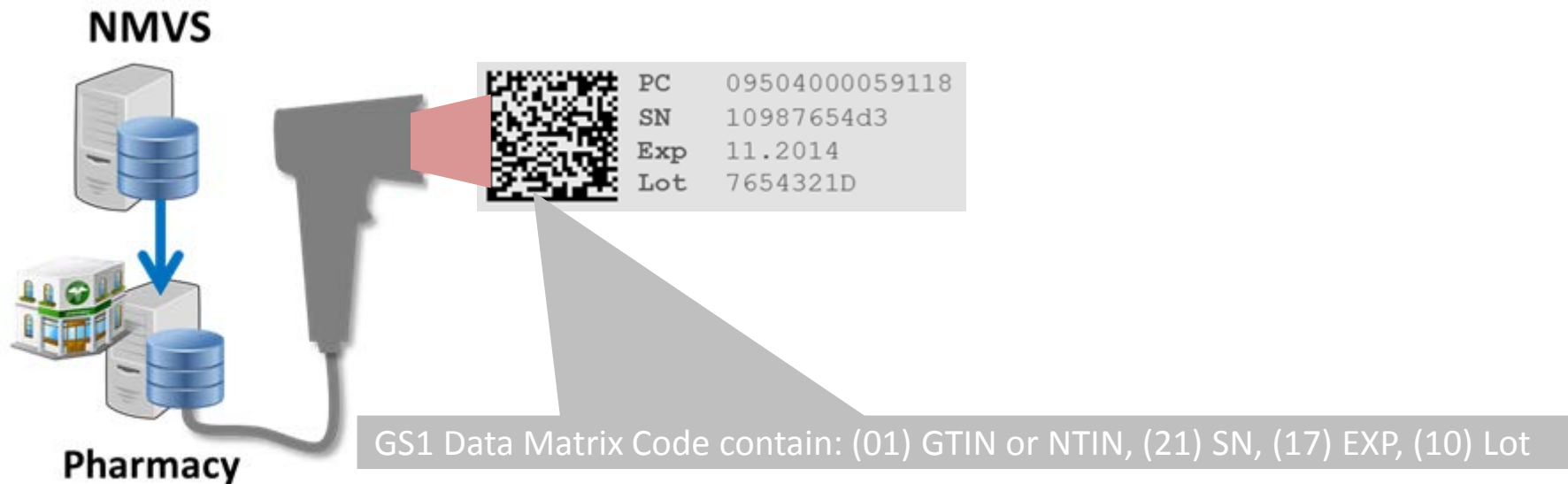
Data carrier: Data Matrix for unique identification

Deadline (date corresponds to Lot release for Market supply):

- Feb 9 2019
- Feb 9 2025 Belgium, Greece and Italy

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Serialization: Unit of Sales



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Data order: GS1 standard

- Use of AI (Application Identifier), allow user software to recognize type of data
- Order: Fix data numerical + variable data alpha numerical

Fix Data	Variable Data
(01) GTIN/ NTIN	(21) Serial Number
	(17) Expiry Date
	(10) Lot Number
	(71x) NN
Data Carrier	Level of Packaging
GS1 Data Matrix	Primary-, Secondary packaging
GS1 128 linear	Tertiary packaging, Pallet

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GTIN vs NTIN across Europe

GS1 - GTIN

Austria*, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark**, Estonia, Finland**, Germany*, Hungary, Iceland**, Ireland, Latvia, Lithuania, Malta, Netherlands, Norway**, Poland**, Portugal, Romania, Slovakia, Slovenia, Spain**, Sweden, Switzerland, UK

* GTIN for multi country - shared packs

** Some countries will allow GTIN or NTIN

GS1 - NTIN

Austria*, France, Germany*

* For market specific packs

TBC

Italy and Greece (coding requirements under discussion)

Some countries (outlined in red) also require a national number in the 2D Barcode when using GTIN

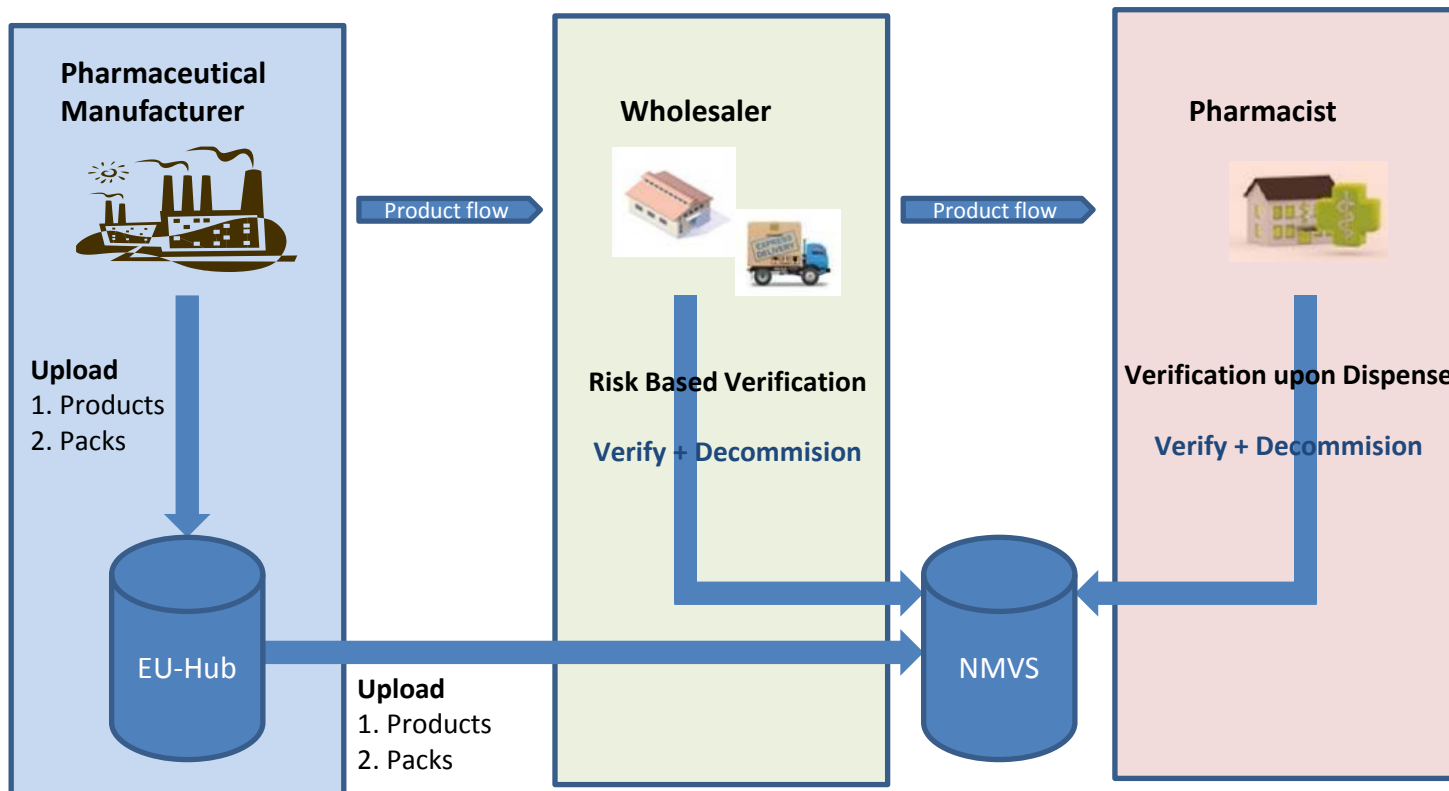
Austria

- NTIN for national packs
- GTIN for multi market packs => Austrian EAN looked up in the repository (AMVS)



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Product flow



Impacts on Packaging Operations in general

- Optimize OEE (Overall Equipment Effectiveness) and setup time
- Increasing level of education for Operators at the packaging line
- GMP Requirements: adapt packaging process to minimize issues during packaging operations

Which countries already receive serialized Product ?

2010	2011	2012	2013	2014	2015	2016	2017
