Seminar Series

Challenges to OTC Drug Product Marketing and Regulation

Co-sponsorship Agreement

Consumer Healthcare Products Association (CHPA)

and

FDA

Steering Committee

Abimbola Abedowale, FDA
Sandy Barnes, FDA
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Robert Eshelman, FDA
Mark Gelbert, Pfizer
David Hilfiker, FDA
Susan James, GlaxoSmithKline
Iris Khalaf, FDA
Karen Lechter, FDA
Lorna Totman, CHPA
Mitchell Weitzman, FDA

Purpose

To promote a better FDA and industry understanding of the unique challenges in the present and future OTC healthcare environment

Potential Future Topics

- Rx to OTC Switch
- Actual Use and Label Comprehension Studies
- Adverse Event Management and Reporting
- OTC Advertising
- NDA vs. Monograph
- OTC Tradenames

Today's Program
Challenges of Change: OTC Label Implementation

- All information for an OTC is communicated *ON* the label vs Rx drugs (PI)
- OTC Label is a physical part of the product
  - what the consumer sees and reads to select a product – the whole package
- Multiple customers
  - The Trade
  - 3rd Parties
  - Consumer

Today's Program

Objectives

1. Review the ***FDA*** basics of an OTC label
2. Understand the impact of ***non-FDA*** elements on OTC labels
3. Compare / contrast creation of new or changing of existing labels between ***NDA/ANDA*** products and ***Monograph*** products
4. Describe the ***complexities*** industry goes though to either create or change an OTC label for NDA, ANDA, & Monograph products – "***The Process***"
5. Comprehend the ***challenges*** to get to market
    - Timing
    - Inventory management
    - Physical limitations
    - Retailer requirements

Let's get started

FDA/CDER & CHPA Seminar Series

OTC Label Components & FDA Label Requirements

Dan Keravich, RPh., MSc., MBA

OTC Drug Labeling

OTC Labeling Premise:

The OTC label is the primary mechanism in which all related safety and efficacy information associated with the use of drug product is conveyed to the consumer.

OTC Drug Labeling

OTC Labeling Components

- Front Panel- PDP
- Back Label- Drug Facts
- Inner labeling
- Outer labeling
- User Guide / Patient Package Insert / CD

OTC Drug Labeling Requirements

Part 201- Labeling

- Subpart C- Labeling Requirements **for** Over- the Counter Drug Products
  - ✓ 201.60 PDP
  - ✓ 201.61 Statement of Identity
  - ✓ 201.62 Net Quantity of contents
  - ✓ 201.63 Pregnancy breast feeding warning
  - ✓ 201.64 Sodium labeling
  - ✓ 201.66 Format and content requirements

OTC Drug Labeling Requirements

Principal Display Panel ~ PDP 201.60

- Part of the label most prominently displayed, presented or shown

Statement of Identity 201.61

- Established name and general pharmacological category(ies)
- Bold and reasonable in size

Net Quantity of Contents 201.62

- weight , measure, count or size

OTC Drug Labeling Requirements

Non-Principal Display Panel

Pregnancy & Breast Feeding ~ 201.63

- General warning unless exempted
- If pregnant or breast feeding - ask a health professional before use.

Sodium Labeling ~ 201.64

- Sodium content per dosage unit if 5mg or more

Drug Facts -Format and Contents requirements ~201.66

- Standard format and content requirements

OTC Drug Labeling Requirements

Drug Facts

- Final Rule: March 17, 1999
- 21 CFR 201.66
  - Established a standardized labeling format and content requirements for all OTC drug products
  - Assists consumers in reading and understanding OTC drug product labeling
    - Standardizes headings/Subheadings
    - Conforming graphics and text

OTC Drug Labeling Requirements

21 CFR 201.66(c): Content

- Title
- Active ingredients
- Purpose
- Use(s)
- Warnings
- Directions
- Other information
- Inactive ingredients
- Questions or comments

BEFORE

Allergy Tablets

INDICATIONS: Provides effective, temporary relief of sneezing, watery and itchy eyes, and runny nose due to hay fever and other upper respiratory allergies.
DIRECTIONS: Adults and children 12 years and over—1 tablet every 4 to 6 hours, not to exceed 6 tablets in 24 hours or as directed by a physician. Children 6 to 11 years—one half the adult dose (break tablet in half) every 4 to 6 hours, not to exceed 3 whole tablets in 24 hours. For children under 6 years, consult a physician.
EACH TABLET CONTAINS: Chlorpheniramine Maleate 4 mg. **May also contain** (may differ from brand): D&C Yellow No. 10, Lactose, Magnesium Stearate, Microcrystalline Cellulose, Pregelatinized Starch.
WARNINGS: May cause excitability especially in children. Do not take this product unless directed by a physician, if you have a breathing problem such as emphysema or chronic bronchitis, or if you have glaucoma or difficulty in urination due to enlargement of the prostate gland. May cause drowsiness; alcohol, sedatives and tranquilizers may increase the drowsiness effect. Avoid alcoholic beverages, and do not take this product if you are taking sedatives or tranquilizers without first consulting your physician. Use caution when driving a motor vehicle or operating machinery. As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a Poison Control Center immediately.

Store at controlled room temperature 2°-30°C (36°-86°F).

Use by expiration date printed on package.

Protect from excessive moisture.

For better identification keep tablets in carton until used.

Made in U.S.A.

N 3 111111 11111 8

AFTER

Allergy Tablets

Drug Facts

Active ingredient (in each tablet)	Purpose
Chlorpheniramine maleate 4 mg	Antihistamine

Uses temporarily relieves these symptoms due to hay fever or other upper respiratory allergies: ■ sneezing ■ runny nose ■ itchy, watery eyes ■ itchy throat

Warnings

Ask a doctor before use if you have
■ glaucoma ■ a breathing problem such as emphysema or chronic bronchitis
■ trouble urinating due to an enlarged prostate gland

Ask a doctor or pharmacist before use if you are taking tranquilizers or sedatives

When using this product
■ you may get drowsy ■ avoid alcoholic drinks
■ alcohol, sedatives, and tranquilizers may increase drowsiness
■ be careful when driving a motor vehicle or operating machinery
■ excitability may occur, especially in children

If pregnant or breast-feeding, ask a health professional before use.
Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away.

Directions

adults and children 12 years and over	take 1 tablet every 4 to 6 hours; not more than 6 tablets in 24 hours
children 6 years to under 12 years	take 1/2 tablet every 4 to 6 hours; not more than 3 tablets in 24 hours
children under 6 years	ask a doctor

Drug Facts (continued)

Other information ■ store at 20-25°C (68-77°F) ■ protect from excessive moisture

Inactive ingredients D&C yellow no. 10, lactose, magnesium stearate, microcrystalline cellulose, pregelatinized starch

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OTC Drug Product Labeling

Monograph Products

- Parts 331 through 358
- No Review Division Review prior to marketing

NDA Products

- CDER Divisions review prior to marketing

OTC Drug Products

Consumer Driven Marketplace

- Store Brands- Company specific labeling for the same product
- Multiple product formulations
- Multiple product line extensions
- Multiple types of packaging

Store Brands Packaging

Brand Name Packaging - Product Line Extensions

NDA Products Packaging- Multiple Formulations

Multiple Types of Packaging

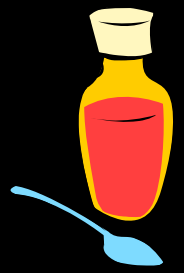
Non-FDA Requirements

Chris Moorman
Senior Regulatory Affairs Manager
Health Care, Oral Care Products
Procter & Gamble

Non-FDA Requirements

Other agencies and key groups impact space on labels / packaging

- **BATF**
- **CPSC**
- **US Customs**
- **The Trade**
- **Others**



Non-FDA Requirements

BATF

27 CFR Parts 1-299

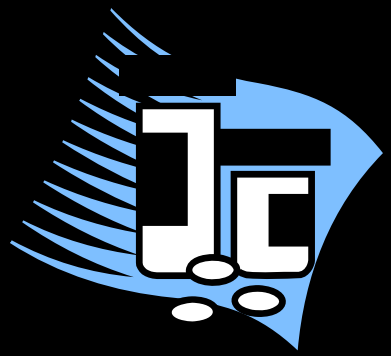
Bureau of Alcohol, Tobacco & Firearms

Non-FDA Requirements

CPSC

16 CFR Parts 1700-1750

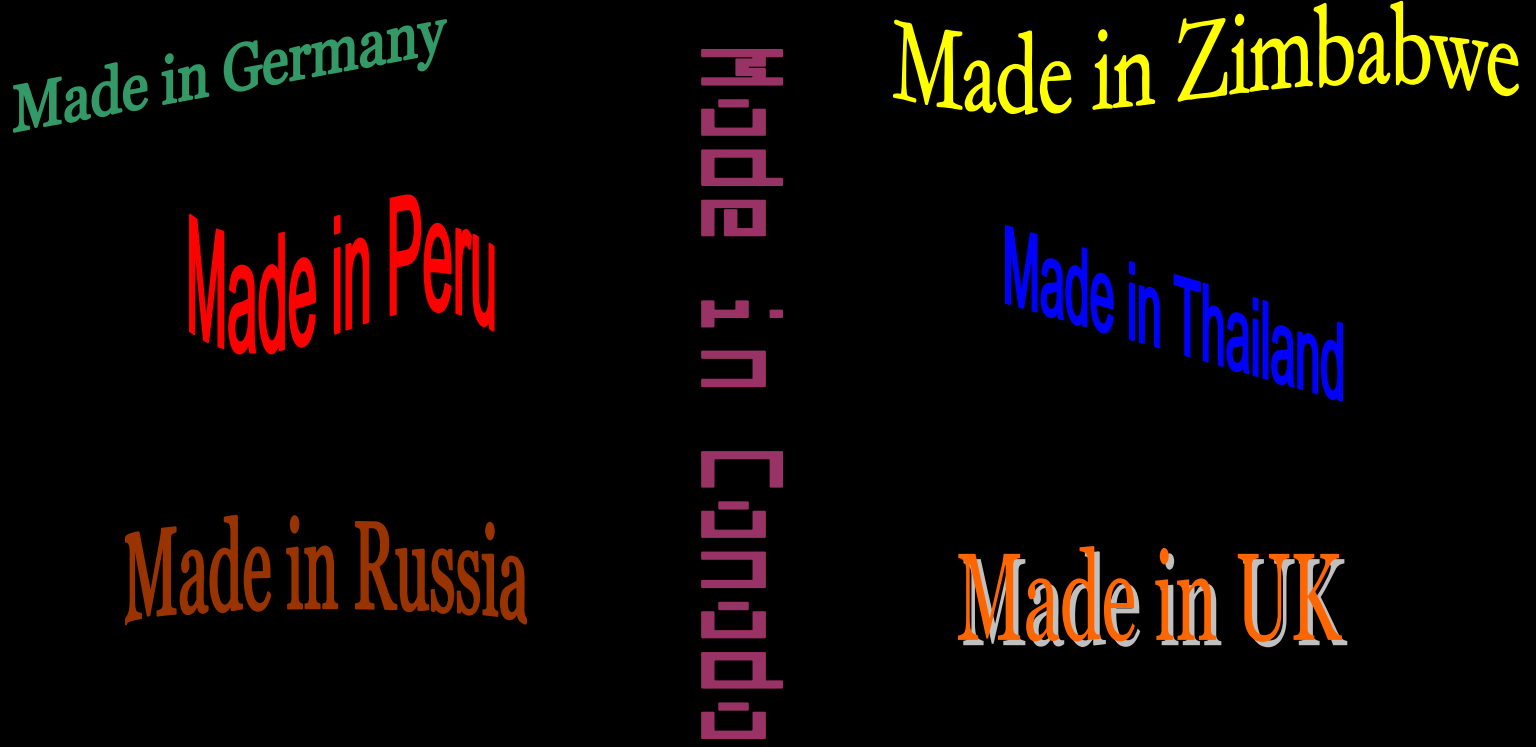
Consumer Product Safety Commission



Non-FDA Requirements

US Customs

19 CFR Parts 1-199



Non-FDA Requirements

The Trade

Non-FDA Requirements

Others

FIFRA

40 CFR Parts 152-180

Federal Insecticide, Fungicide, & Rodenticide Act

FTC

16 CFR Parts 0-999

Federal Trade Commission

Non FDA Requirements

Others cont.

USP

State Laws: e.g., slack fill,

Intellectual Properties ® ™ © patent #

Customer Guarantee for Store Brands

3rd Party Endorsements

"Crest has been shown to be an effective decay preventive dentifrice that can be of significant value when used as directed in a conscientiously applied program of oral hygiene and regular professional care.

Council on Scientific Affairs - American Dental Association

ADA ACCEPTED American Dental Association ®

Non-FDA Requirements

Summary

Other agencies and key groups impact industry's use of what appears to be available space on labels - packaging

NDA, ANDA Vs. Monograph

Heidi Horn
Associate Director
Regulatory Affairs
Perrigo Company

TOPICS

- An explanation of printing at risk
- Why the issuance of a monograph has a greater impact on the labeling development process than the approval of an NDA, ANDA
- Why the issuance of a single monograph does not have the same impact on all manufacturers
- Why adding resources is not an effective solution to increasing capacity
- The impact of minor labeling text changes
- The importance of the availability of the reference listed drug approved labeling

Monograph
Creating Labeling for New Products

- Impact: Few SKU's (≥ 10's)

- Timing: 9 Months (process initiated at Develop Package Structure)

NDA, ANDA
Creating Labeling for New Products

- Impact: Few SKU's (≥ 10's)
- Timing: 5 months from FDA's feedback on labeling

Monograph

Labeling Changes to Existing Products

- Impact: 100's to 1000's SKU's
  (dependent upon the product category)

- Timing: $\geq$ 10 months (entire process)

NDA, ANDA
Labeling Changes to Existing Products

- Impact: 10’s to 100’s SKU’s (dependent upon the NDA, ANDA)
- Timing: 10 months (entire process)

NDA, ANDA vs. Monograph

	Impact	Timing
NDA, ANDA		
New	≥ 10's	5 months
Change to Existing	10's-100's	10 months
Monograph		
New	≥ 10's	9 months
Change to Existing	100's-1000's	≥ 10 months

TOPICS DISCUSSED

- The necessity of printing at risk
- The issuance of a monograph has a greater impact on the labeling development process than the approval of an NDA, ANDA
- The issuance of a single monograph does not have the same impact on all manufacturers
- Adding resources is not an effective solution to increasing capacity
- The impact of minor labeling text changes can be quite substantial
- The availability of approved labeling for the reference listed drug is important

Change Process and Process Flowchart

Jeff Krol

Director, Production Packaging

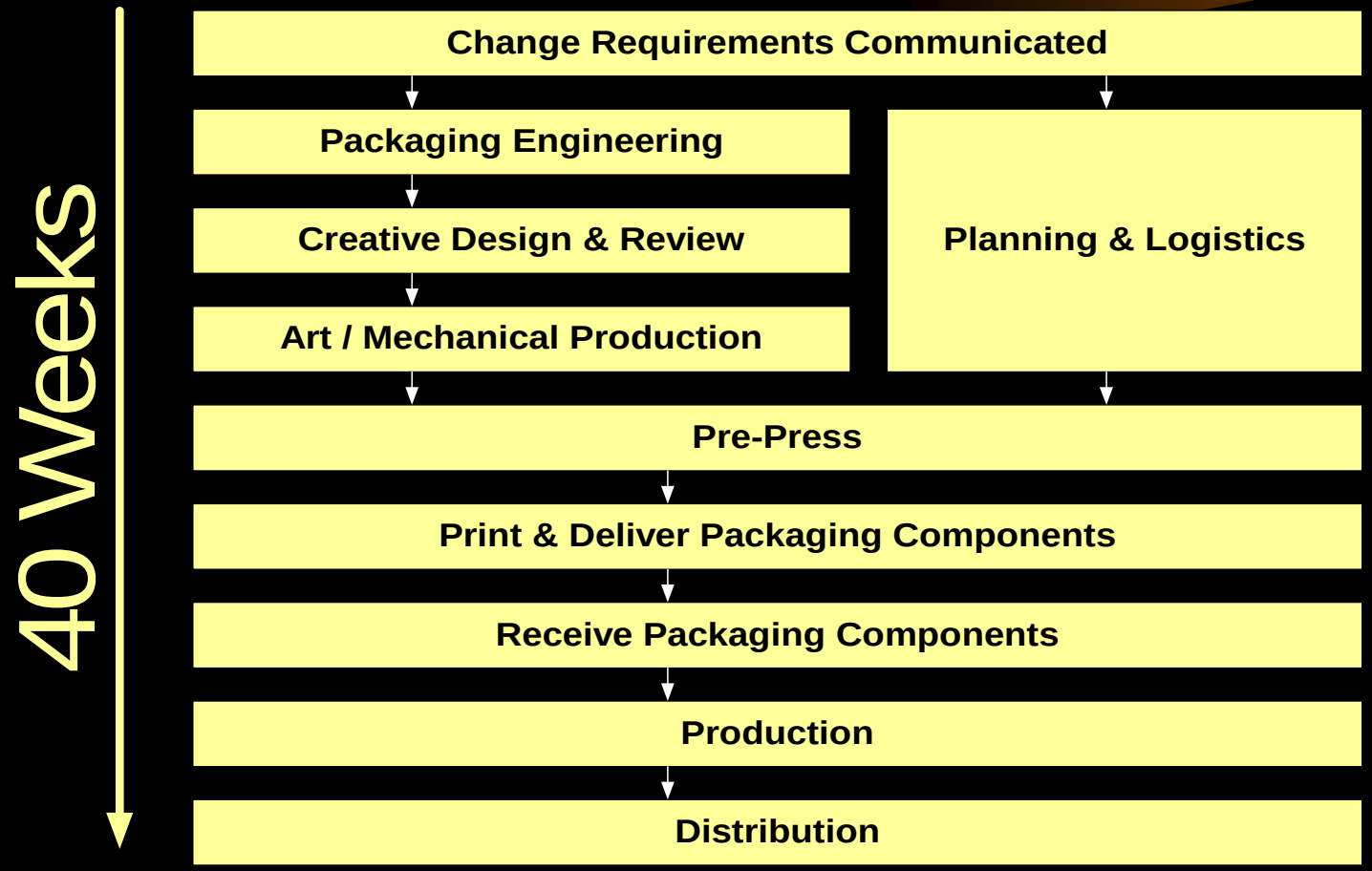
Wyeth Consumer Healthcare

Terry Cullen

Manager Labeling Control & Change Management

Bayer Healthcare LLC

Label Development Process



Change Identified

(4 Weeks)

- **New Rule Published**
- **Industry Analyzes Effects**
  - **Company Decides on Direction, Timing, Format, Etc.**
  - **Required New or Additional Text Identified**

Change Identified

(4 Weeks

- **Financial Analysis**
  - **Cost of Changing Artwork**
  - **Cost of Print Plates and Cylinders**
  - **Engineering and Tooling Costs**
  - **Obsolete Cartons and Labels**
  - **Obsolete Finished Goods**

Change Identified

(4 Weeks)

Number of Components

($800 + $1,800 + $2,000) x 58 = $266,800

Artwork

Print Plates

Obsolete Components

Planning & Logistics

(6 Weeks)

- **Bills of Materials Developed**
  - **Component Numbers Assigned**
  - **Finished Goods Numbers Assigned**
- **Production Schedule Established**
- **Purchase Orders Planned For**

Package Development & Engineering
(6 Weeks)

- **Develop New Structure**
- **Test Structure**
- **Develop Engineering Drawings or Specifications**

Creative

(6 Weeks)

- **Develop Graphic Elements**
- **Review and Approval**

Art / Mechanical

(6 Weeks)

- **Copy Layout**
- ***DOES IT FIT?***
- **Internal Company Review**
- ***IS IT APPROVED?***
- **Release to Printer**

Pre Press

(3 Weeks)

- **Color Separation**
- **Prepare Proofs**
- **Company Review of Proofs**
- ***APPROVED?***
- **Prepare Plates or Cylinders**

Printing

(6 Weeks)

- **Purchase Orders Confirmed**
- **Print Components**
- **Deliver Components**

Inspection
(1 Week)

- **Receive Components Into Site**
- **Quality Check**
- ***Released?***

Production

(5 Weeks)

- **Stage Components**
- **Package Product**
- **Product Quality Check**
- ***Released?***

Distribution

(3 Weeks)

- **Ship Product to Distribution Center**
- **Ship Product to Retailer**
- **Retailer Stocks Shelves**
- ***Customer Buys Product!***

Challenges of Change

Edward M. Dunn, RPh
Senior Manager of Packaging
GlaxoSmithKline

Rich Hollander
Sr. Director, Packaging Services
Pfizer, Inc.

Timing to Market

- Approval for Labeling

  applies to NDA, ANDA and Rule Change
- Creation of Advertising

  includes claims, indications and dosing
- Sell-in to the Retailers

  SKU's need to be identified

  availability confirmed
- Schedule Advertising to Support Launch

  coordinated with TV, print and retailer

Impact of Timing for Approval

- All Season Product
  - $25,000,000 in annual sales
  - $25,000,000 / 52 weeks = $481,000/week
  - each week of delay cost $481,000
- Seasonal Product
  - $25,000,000 in annual sales
  - Retailer allocates space once each year
  - Missed allocation deadline results in all $25,000,000 lost for that year

Inventory Management

- Component Lead Time
  - Labels: 4-6 weeks
  - Cartons: 4-6 weeks
  - Tubes: 12-14 weeks
  - Foil: 14-16 weeks
- Minimize Scrapping
  - a single order of tubes can be $100,000
- Avoid Un-salable Product
  - no salvaging of product, a complete right-off

Physical Limitations

- Current Pack Can Not Accommodate Change
- New Technology Can Meet the Need
- Equipment Needed to Accomodate New Technology
- Package Change and Product May not be Compatible (i.e. larger pack may cause head space problem)

Physical Limitations (cont.)

- Package Dimension Increases Create a Chain Reaction of Events
  - carton gets larger
  - shipper gets larger
  - floor stands get larger
  - pallet patterns change
  - number of shipments get larger

Retailer Requirements

- Shelf Dimensions
  - height and depth are fixed dimensions
- Location In the Store
  - packs that can not fit existing space will need to be moved
- Point of Purchase Promotion
  - number of units put in a display may change due to space limits at the retailer

Retailer Requirements(cont)

Cough and Cold 12FT Section

Challenges of Change: OTC Label Implementation

Summary

1. ***FDA*** and ***Non-FDA*** OTC label elements
2. ***NDA/ANDA*** products versus ***Monograph*** products
3. ***Complexities*** of "***The Process***" and ***Challenges*** to get to ***market***

All information for an OTC is communicated

ON the label

OTC Label is a physical part ***OF*** the product

MULTIPLE customers