CONSULTATION SUBMISSION COVER SHEET

This form accompanies a submission on:

TGA Medicine Labelling and Packaging Review Consultation Paper	
Name and designation:	Mark Rowland, Director Regulatory Affairs
Company/organisation name and address:	Amgen Australia Pty Ltd
Contact phone number:	03 9854 9800
☐ Yes ☒ No	I would like the comments I have provided to be kept confidential: *(Please give reasons and identify specific sections of response if applicable)*
☐ Yes ☒ No	I would like my name to be removed from all documents prior to publication and not be included within the list of submissions on the TGA website.

It would help in the analysis of stakeholder comments if you provide the information requested below.

I am, or I represent, a: (*tick all that apply*)

Business in the therapeutics industry (please tick sector):

☒ Prescription Medicines ☐ OTC Medicines

☐ Complementary Medicines ☐ Medical Devices

☐ Blood/Tissues ☐ Other

☐ Sole trader ☐ Business with employee(s)

☐ Importer ☐ Manufacturer ☐ Supplier ☐ Industry organisation

☐ Government ☐ Researcher ☐ Professional body

☐ Consumer Organisation ☐ Institution *(eg. University, hospital)*

☐ Reg. Affairs Consultant ☐ Laboratory Professional

☐ Healthcare Practitioner - please indicate type of practice

☐ Other (please specify):

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AMGEN

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August 24, 2012

TGA Labelling and Packaging Review
PO Box 100
Woden, ACT, 2606

Subject: 120524: TGA Labelling and Packaging Review

Dear Sir/Madam:

Amgen is a global biotechnology and pharmaceuticals products company based in Thousand Oaks, CA. We are pleased to have the opportunity to offer comments on the Consultation Paper TGA Medicine Labelling and Packaging Review. We have included the following detailed comments in an effort to support the TGA on this endeavor.

Sincerely,

Mark Rowland
Director Regulatory Affairs
Amgen, Inc

ENCLOSURE: Amgen comments on: TGA Labelling and Packaging Review

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Submission in Response to the Consultation Paper Entitled "TGA Medicine Labelling and Packaging Review", May 2012

24 August 2012

Amgen Australia Pty Limited

Level 7, 123 Epping Road
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Executive Summary

Amgen is one of the world's largest biotechnology companies. It pioneered the use of human proteins as therapeutic agents to treat serious illnesses such as cancer, inflammation, and kidney disease.

Amgen therapeutics have changed the practice of medicine, helping millions of people around the world in the fight against cancer, kidney disease, rheumatoid arthritis, and other serious illnesses.

Research and development (R&D) is a major component of Amgen's activities. The company's global R&D investment totalled US$3.2 billion in 2011. Amgen Australia invests around A$30 to 35 million annually in local R&D.

Amgen welcomes the Therapeutic Goods Administration's (TGA) initiative to improve the requirements for medicine labels and packaging to facilitate the safe use of medicines by health care professionals and consumers (patients and their carers), and appreciates the opportunity to provide comments.

Amgen has confined its comments to the consultation paper to the areas of most relevance. Amgen understands that the more fundamental issues of principle have been addressed by Medicines Australia in its submission.

Amgen has suggested some areas where improvements or further clarity would be beneficial.

Introduction

About Amgen:

Amgen is one of the world's largest biotechnology companies. It pioneered the use of human proteins as therapeutic agents to treat serious illnesses such as cancer, inflammation, and kidney disease. Amgen's scientists combine biotechnology with chemistry and with cellular and molecular biology to develop therapeutics. As a result, the company is an expert in multiple treatment modalities including large-molecule proteins, small molecules, and antibodies thus allowing it to choose the best modality to treat a disease.

Research and development (R&D) is a major component of Amgen's activities. The company's global R&D investment totalled US$3.2 billion in 2011. Amgen Australia invests around A$30 to 35 million annually in local R&D.

Australia is one of the highest contributing countries to clinical study activity in the world, with the Australian Amgen subsidiary consistently contributing 7-10%of clinical study patients to the global pool of studies in which we participate.

Almost half of Amgen's activity in Australia is in early phase development (ie, phase 1 and 2 studies). This activity includes a number of cutting-edge phase 1 studies where innovative medicines are evaluated in humans for the first time.

Amgen is committed to taking an active role in contributing to future public policy that is relevant to biologic medicines and industry development in Australia.

Overview:

Amgen welcomes the Therapeutic Goods Administration's (TGA) initiative to improve the requirements for medicine labels and packaging to facilitate the safe use of medicines by health care professionals and consumers (patients and their carers), and appreciates the opportunity to provide comments.

Amgen has confined its comments to the consultation paper to the areas of most relevance. Amgen understands that the more fundamental issues of principle have been addressed by Medicines Australia in its submission.

Response to the specific issues raised in the Consultation Paper

After review of the TGA consultation paper, Amgen has identified some areas for reconsideration and has requests for further clarification from the TGA.

The key area where improvements or changes are sought are:

- The provision of a designated space of 70 x 30 mm to be provided to accommodate the dispensing label.

This proposal can be accommodated to some of our current products but it should be recognised that this will be at an incurred cost. Accommodating the requirement for dispensing label space on smaller products will be complex due to limited space, as the current carton layouts already include mandatory regulatory-related information.

For ease of reference, our comments are provided below in tabulated form with reference to the section of the consultation paper in the left hand column. Responses to the general questions included in the consultation paper are included at the end of each tabulated section.

Comments on the TGA Consultation Paper
TGA Medicine Labelling and Packaging Review
Version 1.0, May 2012

Prominence of active ingredients on medicine labels	Comments
Proposed Regulatory change	
1.1. The active ingredient must be listed immediately below the brand name, with the first letter of the active ingredient directly below the first letter of the brand name.	• Amgen supports this change. Please clarify that this proposed change is required in all instances of the active name beneath the brand name.
1.2.2 The font size of the active ingredient must be at least 100% of the font size of the medicine brand name on the main/front label.	• Where necessary, a biotechnology product descriptor is included after the active ingredient name for biological substances. We recommend the biotechnology product descriptor letter height continue to be at least the minimum letter height requirement of 1.5 mm for lower case letters having an ascender or descender.
1.2.3 For improved differentiation between the brand name and the active ingredient there should be a difference in font style or letter spacing or font colour.	• Amgen supports this change.
1.2.4 The active ingredient should begin with an uppercase letter but the remainder should be in lower case.	• The use of an uppercase letter may not provide a visible difference. The size of the font proposed ie, as per proposed change 1.1 and 1.2.2, may ensure that adequate prominence is given to the active ingredient. There may actually be confusion between the trade name and the active ingredient if both begin with an uppercase letter. We recommend that the space between the lines of the brand name and active ingredient be defined instead. Line spaces should be clear and the space between one line and the next should be at least 1.5 times the space between words on a line[1]. [1] European Commission Guideline on the readability of the labelling and package leaflet of medicinal products for human use, Revision 1, 12 January 2009.

Prominence of active ingredients on medicine labels	Comments
1.5 The active ingredient must be included with, and of equal prominence as, the brand name on at least 3 non-opposing faces of a carton.	• Amgen supports this proposed change.

General questions on the proposed regulatory changes for the prominence of the active ingredients on the medicine labels

What do you think will be the impact of increasing the prominence and standardising the location of the active ingredient on the medicine label?

Amgen supports the TGA initiatives to standardise medicine information to alleviate potential health risks to the consumer. The proposed regulatory changes aim to ensure consistent labelling requirements are applied to all medicines so that a uniform format is implemented. The recommendations are clearly illustrated in the proposed guidelines for non-prescription medicines containing paracetamol. It would be beneficial to have the proposed changes presented on templates applicable to prescription medicines as well for industry to review and comment on.

Increasing the prominence and standardising the location of the active ingredient name is one way of addressing a potential safety risk to the consumer by highlighting that the same active ingredient is included in both the originator and the generic medicine. Consideration should also be given to the use of a product logo in drawing attention to the brand of the product, especially in the case of biologic medicines where a biosimilar medicine is marketed. Any increase in prominence of the active ingredient name must consider the need for brand identification to allow risk management for adverse events reported for biologic medicines where there are biosimilar medicines in the market. Unlike generic medicines, biosimilar medicines are not currently considered interchangeable at the patient level. Due to the inherent differences between an originator and a biosimilar medicine, adverse event reports may be brand- rather than nominal active ingredient-related. In this case, there is a need to be able to identify the exact brand administered to the consumer.

Are there any other concerns you have with the size or position of brand names and active ingredient?

Amgen is aware the above changes are proposed to increase consumer awareness and safety. Consideration should also be given to the fact that consistency in product branding globally is beneficial, as the branding is recognised by health care professionals, patients, and consumers (patients and their carers) as they travel to/from, or reside or work in Australia and other countries.

The increase in font size of the active ingredient name and/or changes in positioning of text may require larger secondary packaging which would increase costs for the manufacturer, supply chain, and end user. Increased cost results from:

- The need for new or alterations to existing packaging equipment to accommodate larger packs. This cost is estimated as ranging from $180,000 to $1,080.00 for each required change,
- Greater size of paperboard employed in packaging. The additional cost increase per product is estimated as ranging from 10% to 20%,
- Need to include additional product protection measures as free space around the primary container is increased,
- Greater area required for storage and shipping by the supply chain,
- Increased space required in pharmacy, where space may be limited, especially cold storage space.
- Increased size of packaging also increases the environmental impact cost.
- The awareness of active ingredients to consumers and health care professionals can also be achieved by other means such as:
    - Consumer, pharmacy and nurse education on information on packaging,
    - The inclusion of medicine characteristics and images on cartons. For example patients are able to identify their medicine by the image and description such as pink round tablet with X.

If the active ingredient name is clear, directly below the brand name and in a large font, what are the additional benefits that you see by making it the same size as the brand name?

This proposed change will benefit pharmacists dispensing prescription medicines, particularly in hospital pharmacy settings where both the colour coding strength and the active ingredient needs to be legible and clearly differentiated from other products, as products are stored in the hospital pharmacy according to active ingredient name.

The prominence and location of the active ingredient would not be as beneficial for retail pharmacists that store prescription products by brand name. In this situation, brand name differentiation may be more important than active ingredient differentiation. We note, however, that this change has the potential to benefit the consumer.

What is the smallest size font that you consider readable?

Papers published on readability studies of font-size requirements for package inserts recommend a minimum 9 point Arial font size for improved readability and usability of important patient information[1]. A 9 point Arial font lowercase 'x' is the equivalent of a letter height of 1.72 mm.
The current recommendation from the European Commission is a type size of 9 points in Times New Roman as a minimum[2]. A 9 point Times New Roman font lowercase 'x' is the equivalent of a letter height of 1.46 mm.

[1] Fuchs, J et al (2010) New Font Size Requirements in Package Inserts of Medicines. *Pharm Ind. 72, Nr. 12, 2032-2036* (2010)

[2]European Commission Guideline on the readability of the labelling and package leaflet of medicinal products for human use, Revision 1, 12 January 2009.

Look-alike and sound alike medicine brand names and look-alike packaging and branding	Comments
Proposed Regulatory change	
3.1. Sponsors of new medicines will be required to submit evidence of risk assessment of the proposed labelling and packaging. The TGA will work with industry to develop guidance for this assessment, which may include consumer testing or risk assessment checklists similar to those used in other countries. The TGA is investigating methods to electronically screen proposed brand names against already existing brand names to identify potential LASA names.	• Amgen recommends evidence of risk assessment is submitted as part of Module 1. • Amgen looks forward to working with the TGA to develop guidance on the required evidence of risk assessment.
3.2 In relation to applications to include a new medicine in the ARTG, if the proposed medicine brand name differs from another product included in the ARTG by three letters or fewer, the presentation of the proposed medicine label and packaging must use colours and designs that contrast with the medicine label and packaging of the existing product. During the implementation of this change, the TGA will work with the medicine industry to develop guidelines to provide clarity about these proposed requirements.	• Amgen looks forward to working with the TGA to develop guidelines around the proposed requirement.
3.3 In relation to applications to change the labelling and packaging of existing medicines, if the brand name of the medicine differs from another medicine included in the ARTG by less than three letters, the proposed changes must use colours and designs that contrast with the medicine label and packaging of the other medicine.	• This proposed change is suitable although further criteria should be specified. It is recommended that for existing medicines, the first product entered on the ARTG should be entitled to retain the colours and designs on their packaging. Amgen agrees that this requirement be applied to applications (Category 1 or 3 applications) to change the labelling and packaging for existing medicines.

Look-alike and sound alike medicine brand names and look-alike packaging and branding	Comments
	• A TGA database displaying the current packaging for all registered products would be helpful for sponsors to identify what contrasting colours should be used.

General questions on the proposed regulatory changes for look-alike sound-alike names and look-alike packaging

Do you think the proposed changes to address LASA names and LA packaging will improve medicine safety? Why//why not?

Amgen agrees that the proposed changes will improve medicine safety as there are measures being implemented that will distinguish products with similar brand names. Additionally, another measure to enhance medicine safety and consumer differentiation would be to include an image and description of the product on packaging. An example would be to include a picture of what a tablet or capsule looks like with a description (ie, 'white tablet' appears on the carton).

Consideration should also be given to the use of a product logo in drawing the attention of the consumer to the brand name and active ingredient. Product logos are beneficial as they draw the attention of the user to the product name and hence the active ingredient name, which can also serve the same purpose as increasing the prominence of the active ingredient name.

Dispensing label space	Comments
Proposed Regulatory change	
5.1 A designated space of 70 x 30 mm, consistent with international best practice must be provided to accommodate the dispensing label.	• This proposed change may be difficult to implement given the size of the carton and the amount of mandatory regulatory information already included on the packaging. There is little free space available even when artwork layout is changed. The use of automated labelling and packaging machinery by manufacturers limits options available for positioning of information. For instance, barcodes and batch/expiry information on the carton can't be reduced in size or relocated to accommodate room for a dispensing label, as the layout and size is set according to machinery specifications. Based on current machinery used, 16 of Amgen's 28 products are able to support this proposed regulatory change.
5.2 Where a clear space is not practical due to constraints from packaging size and shape, the information should be arranged so that information that is likely to be obscured is the same as the information repeated on the label. The area for placement of the sticker should be illustrated by corner placement marks on the packaging.	• This proposed change may be difficult to implement given the size of the carton and the amount of mandatory regulatory information already included on the packaging, which leaves little or no space available to repeat information that is likely to be obscured. Based on current Amgen packaging, 16 of Amgen's 28 products are able to support this proposed regulatory change. • To comply with this requirement, manufacturers will need to use larger cartons which may adversely impact product protection afforded by the secondary packaging, without the inclusion of additional measures to keep the free space around the primary container unchanged. As mentioned on page 6, larger cartons can result in increased costs to manufacturers, supply chain, and end users.

Dispensing label space	Comments
5.3 For small containers, for example eye drops and ointments, where a designated space of 70 x 30 mm is impractical, a clear space should be provided to affix the edges of a folded dispensing label.	• Please see comment in section 5.1.

General question on the proposed regulatory changes for dispensing label space

Do you support a designated space for the dispensing label on prescription medicines? Why/why not?

Amgen agrees that attaching the pharmacy label to packaging could possibly obscure important regulatory information that is needed for the user of the medicine. Amgen is supportive of the change, however this may be difficult to implement due to lack of free space and constraints on how current text can be rearranged because of packaging machinery specifications. The proposed space does not match current dispensing labels employed by Australian pharmacies. Complying with this requirement may not prevent pharmacists from obscuring text when the designated area does not match the labels used by pharmacists.

The proposed change may not prevent all regulatory information from being obscured when a dispensing label is attached. In addition, the Pharmacy Guild may need to be consulted to determine the feasibility of implementing a designated space for the dispensing label. The commitment and education of pharmacists may be required to ensure the success of this proposal.

Provision of space on the packaging has been provided for one dispensing label. Some medicines may be dispensed with additional supplementary labels such as alcohol or drowsiness warnings, which may then be placed over labelling information. Education and training at the pharmacy level would need to be undertaken to ensure that the dispensing space provided is used, and that folded dispensing labels are affixed if there is still limited space or multiple labels used in order for this proposal to be successful.

Blister strip labelling	Comments
Proposed Regulatory change	
6.1 The brand name of the medicine, the active ingredient and the amount of active ingredient, batch number and expiry date must be repeated at least once every two units	• Amgen supports this proposed change
Small Containers (20 mL or less)	**Comments**
Proposed Regulatory change	
7.1 These containers must be enclosed in a primary pack that fully complies with all labelling requirements and that includes a pack insert that provides detailed instructions for use.	• In the case of prescription medicines that are parenterals in small containers, confirmation is required that the Product Information pack insert will suffice. • As outlined on page 6, the financial impact will be an increase in production cost resulting from the need for carton packaging, the need for new or altered packaging equipment to accommodate cartons, as well as increased logistics costs due to a larger packaging size required to be shipped.

General question on the proposed regulatory changes for small container labelling

To what extent do you support the proposed changes for small container labels? Please provide details.

Do you have any further suggestions for how labelling of small containers could be improved?

Amgen supports TGA initiatives to ensure that mandatory regulatory information is made available to consumers as described in section 7.2 of the consultation paper.

The TGA proposal to have all small medicines enclosed in a primary pack with instructions for use may not serve the TGA's purpose of providing medicine information to the consumer if the primary packaging and package insert is discarded. The cost and environmental impact may be greater than the proposed benefit to the consumer.

Labels and packaging advisory committee	Comments
Proposed Regulatory change	
Establishment of a labels and packaging advisory committee	• Amgen agrees with the proposal to establish an advisory committee. Amgen recommends that in addition to the proposed panel members, that the panel include packaging engineers and graphic designers to provide advice on practical aspects of labelling and packaging. The timing of the advice from the expert committee during the evaluation period should fall within the current evaluation timeline so as to not adversely delay the overall decision timeline.