

Regulatory tools for managing the risk of medication errors – labelling & patient information

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- Legal provisions and regulatory objectives
- MHRA Guidance on packaging for safety
- Key findings
- Examples

Regulatory objectives - labelling

- Medicines legislation is set out in Council Directive 2001/83/EC [as amended]
- Information should provide a high degree of consumer protection – [Recital 40]
- Labelling should be clear, legible and unambiguous [Article 56]
- Provide detailed information for the safe use of the product [Article 54]
- Medicines can be selected and used safely

CSM Labelling Group – Key findings

No substitute for reading the label

Certain information critical for safe use

Presentation of information is important

Similarity in packaging can confuse

Look alike/sound alike names cause problems

Medicines labelling can be improved

Critical Information

- Name of medicinal product
– followed by common name
- Strength
- Route of Administration
- Posology
- Warnings

Principles to be applied

- Critical information located together on the pack in the same field of view
- Large font
- Name on three non-opposing faces of the pack
- Common name should be given due prominence
- Innovative pack design and judicious use of colour

Similarity in packaging (1)



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Similarity in Packaging (2)



Similarity in Packaging (3)

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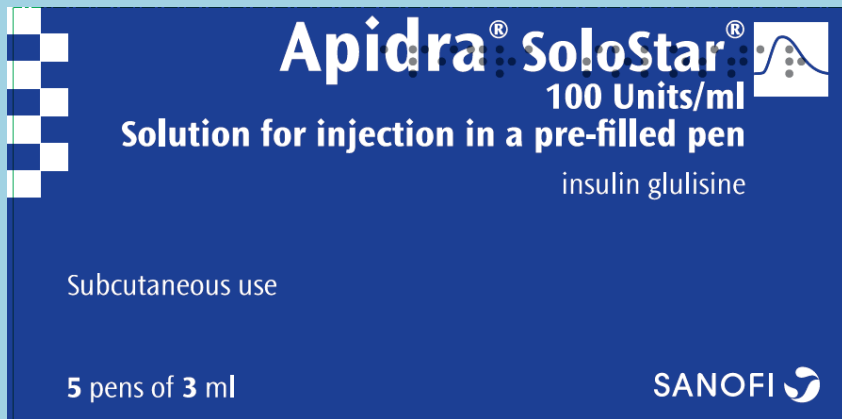
Similarity in Packaging (4)

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Look Alike Sound Alike Common Names

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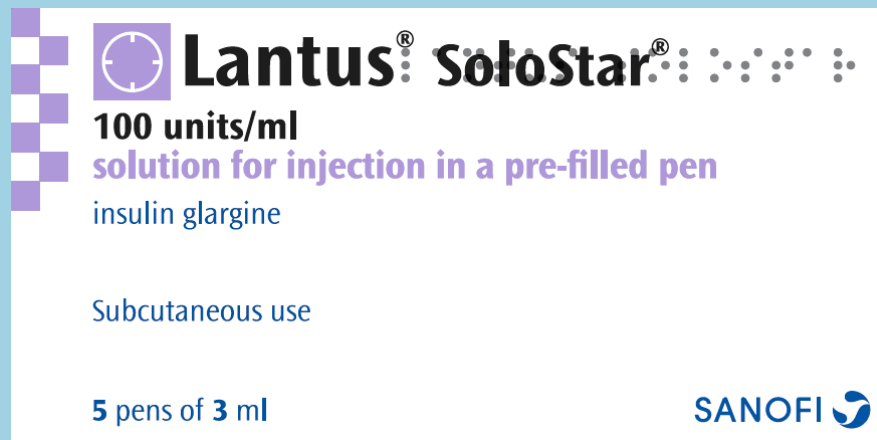


Apidra® SoloStar®
100 Units/ml
Solution for injection in a pre-filled pen
insulin glulisine

Subcutaneous use

5 pens of 3 ml

SANOFI



Lantus® SoloStar®
100 units/ml
solution for injection in a pre-filled pen
insulin glargine

Subcutaneous use

5 pens of 3 ml

SANOFI

Factors to consider in redesigning packaging

- How will the medicine be stored
- Will medicines be co-prescribed
- Differentiation is required both between products and between strengths
- Product name should appear above the space allocated for the dispensing label

Pack Design

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Pack Design

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Pack Design

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Pack design

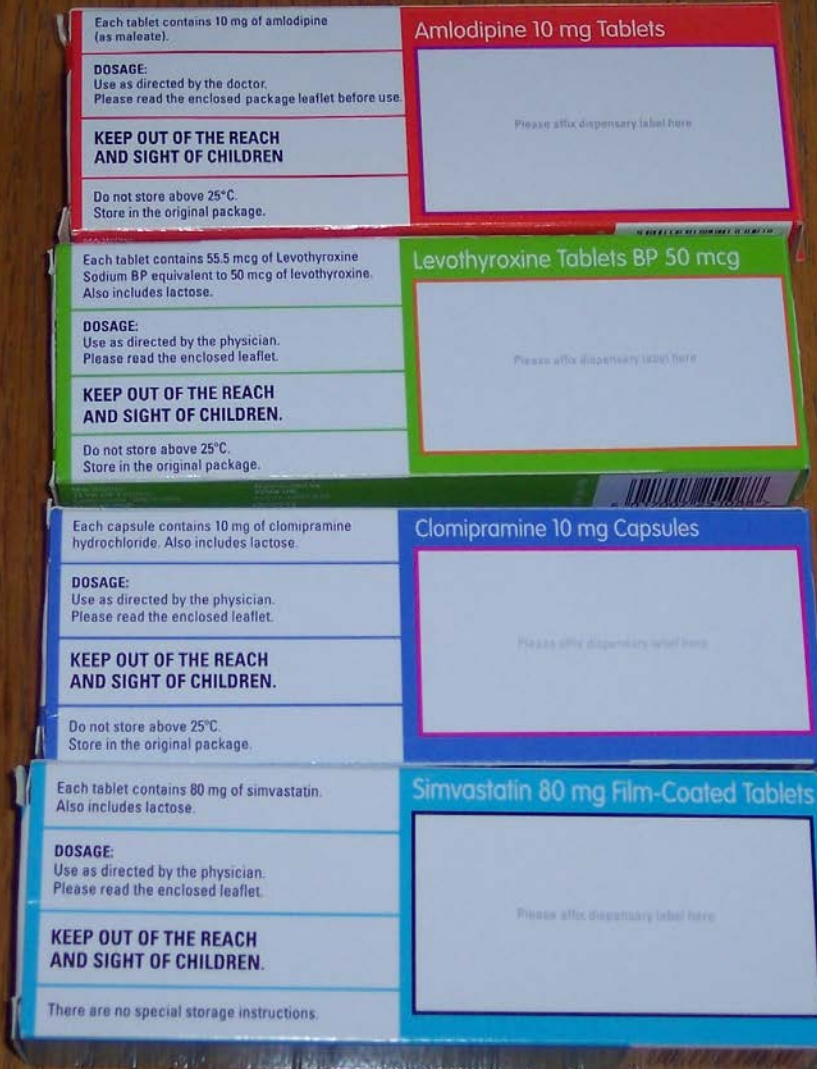


Pack design

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Pack Design



Case Example

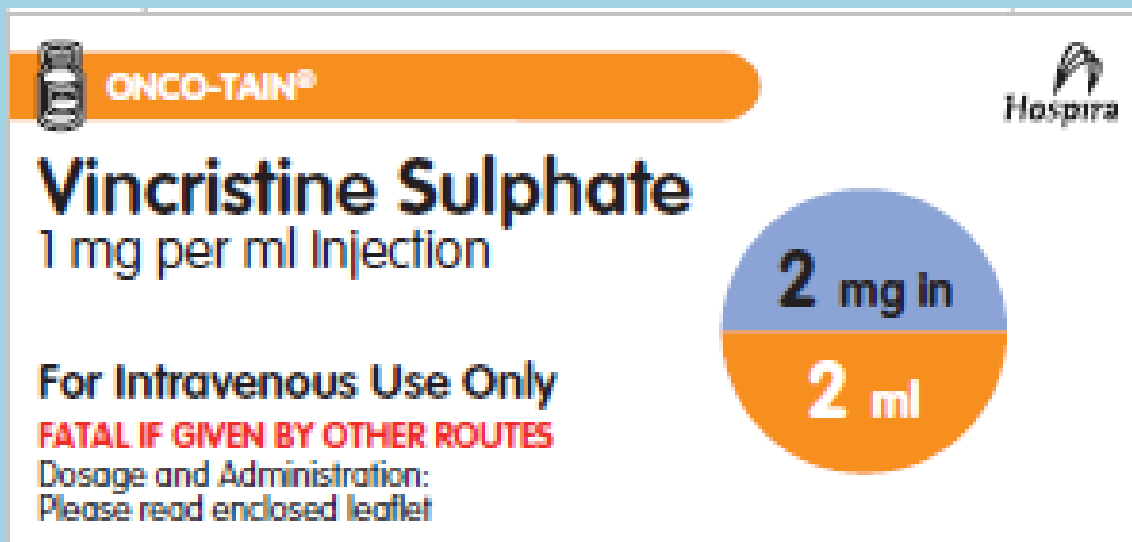
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- Change in legislation to require child-resistant packaging
- International standards:
 - BS EN ISO 8317
 - BS EN 14375

Case Example

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 **ONCO-TAIN®**

Vincristine Sulphate
1 mg per ml Injection

For Intravenous Use Only
FATAL IF GIVEN BY OTHER ROUTES
Dosage and Administration:
Please read enclosed leaflet

2 mg in
2 ml

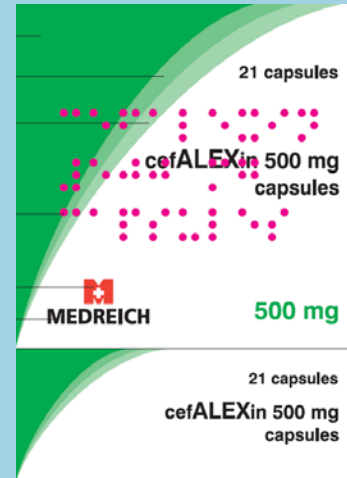
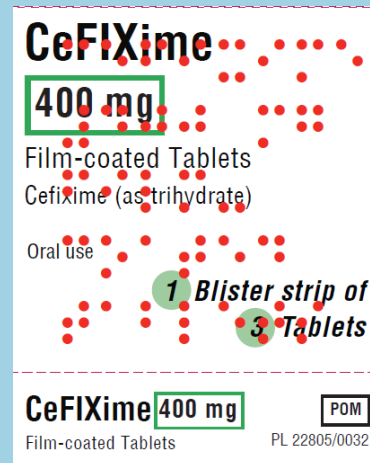
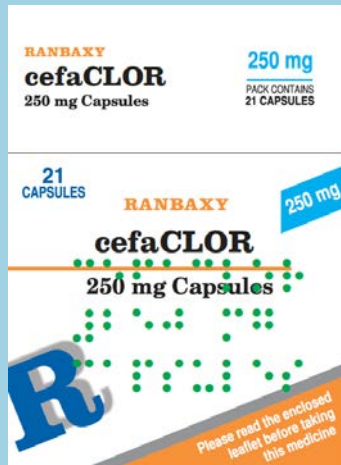
Hospira

- Removal of “negative” statements
- Positive statements only
- All in same field of view
- Clinical guidance published

Case Example

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- Tallman lettering



Case example

Maxtrex® Tablets 10.0 mg
methotrexate

10 mg

Check dose and frequency -
methotrexate is usually
taken once a week

100 Tablets

PHARMACIA

Methotrexate
2.5mg Tablets BP

Each tablet contains
2.5mg of methotrexate

For oral administration

**Take the prescribed
dose once a week**

100 Tablets



Case Example

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Baxter FE1724
Viaflo 1000 ml

**Potassium Chloride 0.3% w/v
 Sodium Chloride 0.18% w/v
 and Glucose 4% w/v**
 Solution for Infusion BP

Contains 40 mmol potassium in 1000 ml UN-55-01-070

pH 3.5 – 5.5 (approx) Hypertonic
 Osmolarity 362 mOsm/l (approx)

Formula per 1000 ml		mmol per 1000 ml (approx)	
Glucose monohydrate	44.0 g	Potassium	40
(equivalent to Glucose Anhydrous 40 g)		Sodium	30
Potassium Chloride	3.0 g	Chloride	70
Sodium Chloride	1.8 g		

Water for Injections qs
 IV administration

Read package leaflet before use
 Keep out of the reach and sight of children
 Do not remove from overwrap until ready for use
 Do not administer simultaneously with blood through the same infusion equipment
 Do not use unless solution is clear without visible particles and container undamaged

Do not reconnect partially used bags

PL00116/0341 UN-35-01-637
 Baxter Healthcare Ltd
 Thetford Norfolk IP24 3SE
 United Kingdom

POM LOT EXP
 5 413760 216119

**K Potassium Chloride
 Concentrate**
15%

1.5 g in 10 ml
 20 millimoles potassium in 10 ml

**Dilute with a suitable diluent,
 to at least 50 times its own volume.**

10 ampoules each containing 10 ml solution for
 slow i.v. infusion after dilution.

1.5 g in 10 ml

hameln

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Case Example

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Durogesic® *DTrans*® 50 mcg/hr transdermal patch fentanyl

One transdermal patch contains 8.4 milligrams of fentanyl
(absorption rate approx 50 micrograms/hour: active surface area 21.0 cm²)

FOR TRANSDERMAL USE

Each patch also contains: polyacrylate adhesive, polyethylene terephthalate/ethyl vinyl acetate film, green printing ink and siliconised polyester film.

POM

C.D.

for external use only

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JANSSEN-CILAG Ltd
50-100 Holmers Farm Way
High Wycombe, Buckinghamshire HP12 4EG, UK

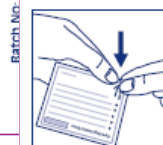


Read the leaflet before use. Dosage: as directed by the doctor.

Remove your old patch before applying a new one on a new area of skin. Apply a new patch every 3 days (72 hours).

Opening Instructions

for external use only



- Gently tear or cut open the pouch at the tear notch, shown by the arrow, and remove the edge of the pouch completely (if you use scissors, cut close to the sealed edge of the pouch to avoid damaging the patch)
- Grasp both sides of the opened pouch and pull apart completely
- Take out the patch and use straight away
- Never divide or cut the patch. Do not use the patch if it looks damaged

Keep out of the reach and sight of children.

DISPOSAL AFTER USE: DO NOT throw the pouch away after removing the patch inside. Keep it to put your used patch in. As soon as you take the patch off, fold it firmly in half (sticky sides together) and put it back in the pouch. Put the pouch in the bin with your household rubbish.

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GB - AW_67893

Don't expose the patch to direct heat such as heating pads, electric blankets, hot-water bottles, heated water beds, heat or tanning lamps, intensive sun bathing, prolonged hot baths, saunas or hot whirlpool spa baths. These may affect the way the medicine is absorbed through the skin

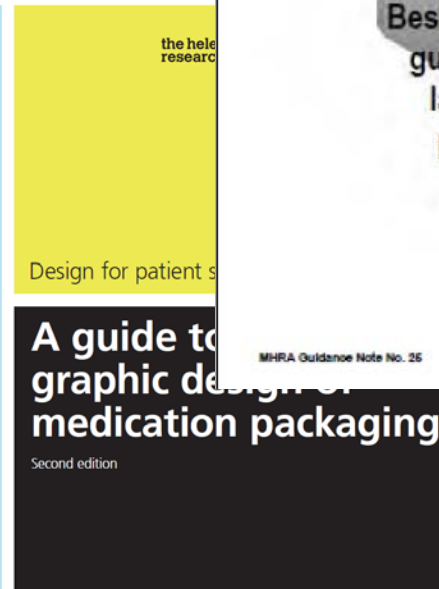
Using and changing the patches

- There is enough medicine in each patch to last **3 days (72 hours)**
- You should change your patch every third day, unless your doctor has told you differently
- Always **remove the old patch before applying a new one**
- Always change your patch at the **same time of day every 3 days (72 hours)**
- If you are using more than one patch, change all your patches at the same time
- Make a note of the **day, date and time** you apply a patch, to remind you when you need to change your patch
- The following table shows you which day of the week to change your patch:

Apply your patch on		Change your patch at the same time on
Monday	⇒	Thursday
Tuesday	⇒	Friday
Wednesday	⇒	Saturday
Thursday	⇒	Sunday
Friday	⇒	Monday
Saturday	⇒	Tuesday
Sunday	⇒	Wednesday

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the Agency of Intellectual Property



Summary



- Issues are **global** – not local
- Primary purpose of labelling is the clear and unambiguous identification of the medicine and the conditions for safe use
- Certain items of information are vital for the safe use of the product
- All information must be presented in a legible and easily understood manner by all users
- Innovative pack design and the judicious use of colour can improve patient safety and reduce likelihood of error