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December 30, 2005

James W. Kelly, Ph.D.
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The United States Pharmacopeial Convention Inc.
12601 Twinbrook Parkway
Rockville, MD 20852

Ref: Labeling on Ferrules and Cap Overseals – PF 31 (5) (Sept/Oct. 2005), pp. 1431-1432.

Dear Dr. Kelly:

The Parenteral Drug Association (PDA) is pleased to provide comment to USP on the proposed changes to USP General Chapter <1> Injections described in Pharmacopeial Forum 31 (5), September/October 2005. PDA is a non-profit international professional association of more than 10,000 individual member scientists having an interest in the fields of pharmaceutical, biological and device manufacturing and quality.

The proposal addresses changes to the requirements for labeling on ferrules and cap overseals. PDA submitted a Notice of Intent to Comment to USP on the above referenced subject on November 8, 2005 which was acknowledged by USP on November 16, 2005 (USP Correspondence No. 43956-1). PDA wishes to thank USP for the opportunity to provide comments on this proposal.

PDA members through our Packaging Science Interest Group (PSIG) have reviewed the proposal and would like to highlight several concerns:

- ◆ PDA supports the need that Cautionary Statements, where appropriate, should be standardized in their location on vials to include the cap overseal. It should be noted however, that the cap overseal will be removed prior to administration and cautionary information could be lost prior to the time of administration. PDA does understand the need, where Cautionary Statements are required, that other information should not distract from the primary warnings that are placed on the top cap overseal.
- ◆ PDA supports the inclusion of Cautionary Statements on the top of the ferrule that is exposed after the cap overseal has been removed. In the case of a clear cap overseal a cautionary statement on the ferrule alone would be sufficient. This area should not necessarily be restricted to Cautionary Statements alone, but other features should not distract from these warnings.
- ◆ PDA does not believe that **only** Cautionary Statements (e.g. "Paralyzing Agent", or Potassium Chloride dilution requirements) should be permitted on the cap overseal or ferrule. PDA members have been working with the FDA regarding another public health concern – counterfeiting, that spans many products and package presentations. PDA members have been working independently and collectively with regulatory bodies to develop and employ various anti-counterfeiting initiatives.

- ◆ Many of the anti-counterfeiting initiatives have focused on inclusion of both overt and covert features on injectable products. Pharmaceutical companies utilize the inclusion of anti-counterfeiting features into product package configurations to provide consumers with confidence that the product(s) they receive are from legitimate sources. Application of anti-counterfeiting technology should be considered a significant contribution by manufacturers toward prevention of this serious threat to patient health and safety. Anti-counterfeiting initiatives play a critical role in support of patient safety. Where Cautionary Statements are needed, PDA agrees that anti-counterfeiting features should not distract from the primary warning.
- ◆ PDA members recognize that the labeling of products is subject to regulatory approval and will continue to work with regulatory bodies to assure that injectable product labeling that appears on both the ferrule and cap overseal is acceptable prior to marketing.
- ◆ The presence of manufacturer and/or drug identity on the cap overseal could reduce medical errors by further differentiating drug products when overseal caps of the same color are used on different medications.
- ◆ PDA would like to see less prescriptive language by USP concerning the information that can appear on ferrules and overseals. It is the purview of the FDA/regulatory bodies to determine the appropriateness of the labeling content. Text and printing on overseals and ferrules should be justified. Warning statements that are deemed to be essential (as with Neuromuscular blocking agents) have been emphasized in another section of the Injectables chapter and are considered to be relevant and appropriate. However, there are many injectable products that do not require cautionary statements and drug manufacturers should be afforded flexibility in the use of the available printing area on the ferrules and overseals.

Sincerely,

Robert B. Myers
President, PDA