

Table of Contents

Chapter 1	Introduction to Healthcare Product Labeling	1
	<i>Cathleen O'Connell, PhD, MS, RPh</i>	
Chapter 2	Content Development	5
	<i>Cathleen O'Connell, PhD, MS, RPh</i>	
Chapter 3	Content Development – Special Considerations for Medical Devices	13
	<i>Eleonora Chakraborty, RAC-US, RAC-EU</i>	
Chapter 4	Core Labeling.....	19
	<i>Cathleen O'Connell, PhD, MS, RPh, Ameesha Batheja, PhD, and Stephanie Turri, MS</i>	
Chapter 5	Pharmaceutical Labeling in the US.....	33
	<i>Cathleen O'Connell, PhD, MS, RPh, Susan Merchant, Zahra Martinez, PharmD, RPh, and Jocelyn Jennings, MS, RAC-US, RAC-Drugs, RAC-Devices, FRAPS</i>	
Chapter 6	Patient Labeling in the US.....	55
	<i>Cathleen O'Connell, PhD, MS, RPh, Christine Holzmüller, and Hoi Lam Chan, MPH, BPharm (Hons)</i>	
Chapter 7	EU Product Information.....	67
	<i>Nicole Beard, PhD, MSc</i>	
Chapter 8	Labeling of Human Drugs in Canada.....	79
	<i>Mary Speagle, RAC-US, RAC-CAN, RAC-Drugs</i>	
Chapter 9	Labeling of Nonprescription Human Drugs in Canada.....	91
	<i>Mary Speagle, RAC-US, RAC-CAN, RAC-Drugs</i>	
Chapter 10	Plain Language Labeling.....	101
	<i>Mary Speagle, RAC-US, RAC-CAN, RAC-Drugs</i>	
Chapter 11	Medical Device Labeling in the US	107
	<i>Rita P. Francis, PhD, MS, MBA</i>	
Chapter 12	EU Labeling for Medical Devices and In Vitro Diagnostic Medical Devices.....	117
	<i>Nicole Beard, PhD, MSc</i>	

Chapter 13	Canadian Labeling for Medical Devices and In Vitro Diagnostic Devices	125
	<i>Shirley Furesz, PhD, RAC-CAN</i>	
Chapter 14	Operational Considerations.....	139
	<i>Debra Goetchius</i>	
Chapter 15	US Submissions and Launch Activities.....	161
	<i>Julie Willmes, Prashanthi Suganthan, and Luke Catanzaro</i>	
Chapter 16	EU Submissions and Launch Activities	175
	<i>Rosy Henschel Undari</i>	
Chapter 17	Target Product Profiles and Target Labeling	183
	<i>Cathleen O'Connell, PhD, MS, RPh, Christine Holzmüller, and Joy Frestedt, PhD, RAC-US, FRAPS</i>	
Chapter 18	Investigational Drug Labeling.....	193
	<i>Karen Long, MSc, RAC-US, RAC-EU, RAC-CAN, RAC-Global</i>	
Chapter 19	Labeling and Packaging of Cannabis Products	203
	<i>Nadja Torres, MD, MPH, MS</i>	

Figures

Figure 2-1.	Vioxx	10
Figure 4-1.	Development of CCDS and Local Labeling Documents	26
Figure 5-1.	Prescription Drug Labeling Sections 8.1–8.3 (Use in Specific Populations)	41
Figure 6-1.	Patient Medication Information Example.....	61
Figure 6-2.	Drug Facts Label.....	63
Figure 11-1.	Regulation 888.3040	110
Figure 14-1.	NDC Number Example	142
Figure 14-2.	Trade Bottle Label.....	149
Figure 14-3.	Small Container Label (Small Label Exemption Rule).....	150
Figure 14-4.	Folding Carton for Pharmaceutical Drug Product.....	152
Figure 14-5.	Biologic Label	155
Figure 14-6.	Biologic Carton Label.....	156
Figure 15-1.	Information Included in the SPL.....	165
Figure 15-2.	Labeling Operations Activities in the Submission Process (black boxes)	168
Figure 15-3.	Submission Types and Implementation Timing for Postmarketing Labeling Changes... ..	169
Figure 15-4.	NDA/ANDA and BLA Annual Report Submission Timing	171
Figure 15-5.	Labeling Summary Sections in NDA and BLA Annual Reports	171
Figure 16-1.	Product Information Elements Included in Module 1 of the Common Technical Document (Administrative Information and Prescribing Information) in the EU	176
Figure 16-2.	Timeline for New Applications and Extensions (Pre-Opinion) – Mock-Up Review Points.....	179

Tables

Table 3-1.	Typical Functional Representation on Medical Device Labeling Teams.....	14
Table 3-2.	Package and IFU Labeling.....	15
Table 4-1.	Distinctions Between Core Labeling and Regional and Local Data Sheets.....	20
Table 4-2.	Content of the CCDS.....	22
Table 4-3.	Sample Structure of CCDS.....	23
Table 4-4.	Sample Mechanisms to Distinguish Optional Text Within a CCDS	23
Table 4-5.	Distribution Package	25
Table 4-6.	Sample Justification for Discrepancy Between Local Labeling and CCDS	27
Table 4-7.	Elements to Be Specified in Procedures Governing the Maintenance and Implementation of Core Labeling.....	28
Table 4-8.	Reference Product Information Used for Expedited and Periodic Safety Reporting	29
Table 5-1.	Laws and Amendments Relating to Pharmaceutical Labeling in the US	34
Table 5-2.	Required Elements for Container Labels of Prescription Drugs and Biologics	37
Table 5-3.	Required Sections of Prescribing Information for Drugs and Biologics in the US (PLR Format).....	38
Table 5-4.	Some Reasons for Labeling Revision	43
Table 6-1.	Action Plan Criteria for Defining Useful Information.....	56
Table 6-2.	Patient-Oriented Prescription Drug Labeling	58
Table 6-3.	Labeling Regulations for Nonprescription Medicines.....	63
Table 7-1.	SmPC Content.....	69
Table 7-2.	Package Leaflet Content	72
Table 7-3.	Linguistic Review Process (Centralized Procedure)	75
Table 8-1.	Product Monograph Master Template Sections.....	87
Table 9-1.	CDFT Sections.....	95
Table 14-1.	Select Resources on Pictogram Use.....	146
Table 17-1.	Distinction Between Target Profiles and Target Labeling Documents.....	184
Table 17-2.	Milestones in the Evolution of Target Labeling as a Drug Development Tool.....	186
Table 17-3.	FDA's Target Product Profile – Indications and Usage Section.....	187
Table 17-4.	Target Labeling, Sample Tabular Structure for General Use.....	188
Table 18-1.	EU Clinical Trials Regulation Annex VI Labeling Requirements (Mandatory Items in Shaded Boxes).....	196
Table 18-2.	European Free Trade Association Language Requirements for Investigational Medicinal Products.....	200
Table 19-1.	Important Consumer Information to Include in Cannabis Labeling	206
Table 19-2.	Links to State-Specific Labeling and Packaging Regulations	207
Table 19-3.	Stakeholder-Unique Recommendations for Cannabis Labeling	209
Table 19-4.	National Cannabis Industry Association Recommendations for Cannabis Packaging...	210
Table 19-5.	Categories of CBD Products.....	211
Index.....		215

Author Acknowledgments

RAPS thanks the following subject matter experts for sharing their experience and knowledge and volunteering their time to contribute to this second edition of Essentials of Healthcare Product Labeling.

Editor

Cathleen A. O'Connell, PhD, MS, RPh

Authors

Nicole Beard, PhD, MSc

Founder and Head of Regulatory Affairs
Biogecho Consulting GmbH

Luke B. Catanzaro

Associate Director
Janssen Research & Development, LLC

Eleonora Chakraborty, RAC-US, RAC-EU

Associate Director, Regulatory Affairs

Hoi Lam Chan, MPH, BPharm (Hons)

Global Labeling Lead
Pfizer

Rita P. Francis, PhD, MS, MBA

Joy L. Frestedt, PhD, RAC-US, FRAPS

President and CEO
Frestedt Incorporated

Shirley Furesz, PhD, RAC-CAN

Director, Regulatory Affairs, Medical Devices
Innomar Strategies Inc.

Debra B. Goetchius

Associate Director, Global Labeling
Implementation
Janssen Research & Development, LLC

Rosy Henschel Undari

EMEA Regulatory Management Center:
Artwork Management
Janssen-Cilag Limited

**Jocelyn Jennings, MS, RAC-US, RAC-Drugs,
RAC-Devices, FRAPS**

Vice President, Regulatory Affairs and Quality
Assurance
Mycovia Pharmaceuticals, Inc.

Stephanie Turri Lockman, MS

Associate Director, Global Labeling Center of
Excellence
Janssen Research & Development, LLC

**Karen Long, MSc, RAC-US, RAC-EU, RAC-
CAN, RAC-Global**

Senior Director, Drug Development
Mesentech, Inc.

Zahra D. Martinez, PharmD, RPh

Associate Director, Global Labeling Product
Leader
Janssen Research & Development, LLC

**Mary Speagle, RAC-US, RAC-CAN,
RAC-Drugs**

Senior Director, Regulatory Affairs
Innomar Strategies Inc.

Nadja Torres, MD, MPH, MS