Building a Serialization Compliance/Advocacy Management System

Lewis Kontnik, Director
Global Product Protection
Amgen Inc. (April 2013)
# About Amgen

- World’s leading independent biotechnology company, with a mission to serve patients
  - Amgen medicines have reached more than 25 million patients
  - Presence in more than 50 countries
- More than 30 years of pioneering science and vital medicines
- Focus solely on discovering, developing, and making human therapeutics
  - Specializing in innovative medicines for serious illness
  - Pioneer and world leader in protein therapeutic manufacturing
- Broad and deep pipeline of novel product candidates

## Marketed Products

<table>
<thead>
<tr>
<th>Product</th>
<th>Description</th>
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<tbody>
<tr>
<td>EPOGEN® (epoetin alfa)</td>
<td>Recombinant</td>
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<tr>
<td>NEUPOGEN® (filgrastim)</td>
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<td>Aranesp® (darbepoetin alfa)</td>
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<td>Neulasta® (pegfilgrastim)</td>
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<td>Enbrel® etanercept</td>
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<tr>
<td>Sensipar® (cinacalcet) Tablets</td>
<td>30mg-60mg-90mg</td>
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<td>Mimpura® cinacalcet</td>
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<tr>
<td>Vectibix® (panitumumab)</td>
<td>Injectors for IV Infusion</td>
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<td>Nplate® romiplostim</td>
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<tr>
<td>Prolia® (denosumab)</td>
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<td>XGEVA® (denosumab)</td>
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For additional information about Amgen products, including important safety information, visit [www.amgen.com](http://www.amgen.com)
Building a Serialization System in a Changing Regulatory Environment

Part 1  Tracking, understanding and complying in an evolving regulatory environment

Part 2  Working to influence regulations to promote effective systems

Focus on regulatory issues not on mechanics of serialization
Part 1: Building a Global Serialization Compliance Management System

The Challenge:

• Monitor developing serialization requirements and define compliance solutions, while the company expands globally

It’s like building the plane while flying it!
There is a History to This

- 2004, California: Pedigree by 2007
- 2006, California: Serialization required by 2009/11
- 2008, California: Serialization required by 2015-17
- 2008, EU DG Enterprise: Options to Combat Counterfeits
- 2009/10, Turkey Planning and Implementation
- 2009, Brazil Casa da Moeda system
- 2010, China Electronic Monitoring of Essential Drugs
- 2011, EU Falsified Medicines Directive
- 2011, Argentina Serialization required by 2012
- 2013, Brazil distributed tracking system
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We have often underestimated the complexity of enabling such a system
Prism of California Implementation
This is a Technology Issue, Right?

• Yes,
  • California has defined requirements: Serialization by 2011/15 and e-pedigree
  • Europe is defining its requirements but looks like GS1 standards
  • So, work on the lines and IS support is essential to comply
  • Creation of a “corporate serialization solution”

• But,
  • More there are different systems and timelines
    – Italy, Turkey, China, etc
  • Regulations in formation
    – What do we build for?

We need an enterprise-level solution, but something else, too
Legislative Echoes in Europe
Something’s Happening: Watch It

• Deliberate Falsified Medicines Directive process
  • Delegated acts shall set out … the characteristics and technical specifications of the unique identifier of the safety features
• Are the operational requirements going to be compatible with CA?
  • From a product manufacturing/IS perspective—Yes
• We have systems in place for other issues, right?
  • Bollino for Italy, Belgium; 2D Matrix for France

Ok, a Technical Project, with monitoring of requirements
Requirements Continue to Emerge Lining-up Production Capability

- Emerging/changing requirements
  - Possible legislation by Congress in US—effect on CA planning?
  - EFPIA and EDQM in EU—authentication or track and trace?
  - Additional requirements for China, South Korea, Taiwan, Argentina, India, Brazil, Saudi Arabia
  - Group purchasing organization requests
- Matching production with requirements
  - For each product in each country-production line implementation must meet regulatory timeline
  - Limits on serialization equipment and resources
  - Serialization implementation is just one of many manufacturing requirements
  - Regulatory filings and other compliance requirements too
  - Need to ensure uninterrupted supply of medicine
Be Mindful of Expansion, too

- Need to integrate
  - New products
  - New partners
  - New markets
  - Developing requirements
- A database tool cannot account for all the issues
  - Evaluate expansions against corporate serialization plan
  - Determine gaps and issues
  - Opportunities for regulatory change
  - Need for “specialized” solutions

Fitting the pieces together is necessary to assure supply
This is Well Beyond just Technology

Corporate Serialization Program Work Streams

- Packaging Lines Hardware and Software
- ERP Inventory Management & Distribution Centers
- Manufacturing Execution Software
- Contract Manufacturing
- Trading Partner Integration
- Encoding Strategy Development
- Quality
- Validation
- Regulatory Management

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The Regulatory Management Work Stream Assures Global Compliance

- Monitor regulations within Company’s expanding footprint
- Analyzes for compliance gaps and solutions
- Provide advocacy through industry forums

Regulatory Work Stream

- Corporate Brand Protection
- Corporate and Regional Supply Chain Operations
- Global Government Affairs
- Corporate and Regional Regulatory Affairs
- Corporate Compliance
- Alliance Management
- Legal
Solution is a balance between requirements, operations and commercial
Part 2: Must Advocate for Realistic, Implementable Requirements

- Support patient safety, criminal enforcement and fraud prevention goals
- Point out the “impossible”
- Drive for manageable interoperability processes
- Adopt timelines compatible with resource and equipment availability
- Avoid requirements that would disrupt the availability of medicines

Pieces must fit in order to land on success
Approaching Effective Dates are Increasing Urgency of Alignment

- Interoperability” (DPMS v. EPCIS) approach
- EFPIA v. EDQM systems
- Non-GS1 system coding
- Excessive duplication in distributed systems
- “Real Time” system response
- Proprietary SMS approaches

Timelines are always an issue of concern
Especially with scarce expertise and equipment
Important for All Stakeholders to Cooperate to Advance Goals

- Regulators-establish achievable, harmonized requirement with broad input
- GS1-establish effective standards as a basis for system design and operations
- Supply chain associations-play active, knowledgeable facilitator role within business and with regulators
- Companies-effective analysis of capabilities, communication of possibilities, and implementation
- Vendors-realistic commitments and cooperation

Idealistic Goals
An iterative process that can lead to real results
An Impressive Example

• Draft Brazil Regulations (progress before our eyes)
  • Rapid communication of requirement and capabilities
  • Engagement of informed industry associations
  • Identification of key requirements
  • Development of sincere approaches as regulatory input
• Iteration continuing in EU and US
• Other opportunities China, Unit Level Marking

We must continue the process to make the leap
Questions?

Thanks to GS1 Healthcare and each of you
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