Drug Volume Reporting: Industry Perspective

Ben Harpster August, 2022

About GSK

- GSK is a distributer and manufacturer.
- GSK distributes both prescription drugs and vaccines.
- GSK has 20 manufacturing sites that are involved in the supply to the U.S. market. Some of these sites are testing labs.
- GSK manufactures some of its own products as well as products for other companies. This includes:
  - Pharma products
  - Vaccine products
  - OTC products

What to remember when reviewing a new guidance.

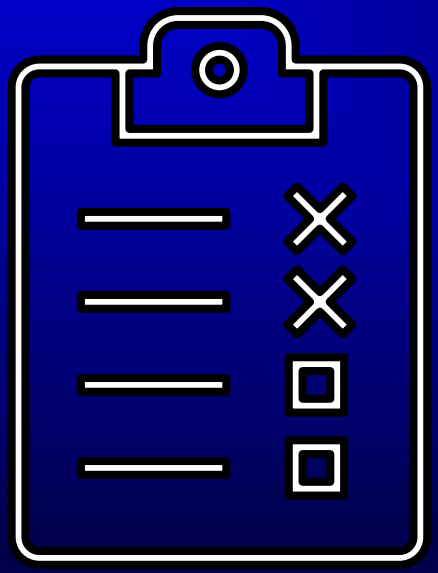
The Plan

Step 1: Identify scope/responsibility?

Step 2: Identify source(s) of information.

Step 3: Collect and collate the data.

Step 4: Review and submit the reports.



Identify Scope/Responsibility

- Reporting to be done on all NDCs. This includes:
  - Distributed NDCs
  - Drug Product Manufacturer NDCs
  - Drug Substance Manufacturer NDCs
- At GSK, we had all three types.

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Identify Scope/Responsibility

- GSK reported for products manufactured at GSK manufacturing sites.
- Contract Manufacturers that manufacture our products would do their own reporting.
- We used “release” from the site of manufacture.

Identify Source(s) of Information

- As reporting was to be done per NDC, this meant that the Structured Product Labeling (SPL) would be the starting source of skus in scope. These would be provided by the SPL Subject Matter Expert (SME).

- Next step was to link the NDCs to the material codes that identify individual products in our resource management software. In our case this is the software SAP.

Identify Source(s) of Information

- Linking the NDCs to the material codes for marketed skus.
  - This was a manual process. We did track this information already, just in a separate system.
- Linking the NDCs to the material codes for manufacturer NDCs.
  - This was a lengthy process as this took cooperation between SPL SME and the site planning departments.

Collect and Collate Data

- Once all material codes were identified, data was extracted from SAP for the reporting period.
- With help from someone from our data analytics groups, we were able to put calculations in a spreadsheet to generate the data in the requested format.

Collect and Collate Data

- Examples of items that would need calculations would be:
  - Bulks (both drug substance and drug product).
  - Products that had multiple levels of packaging.
    - Example of this would be a carton containing 10 vials.

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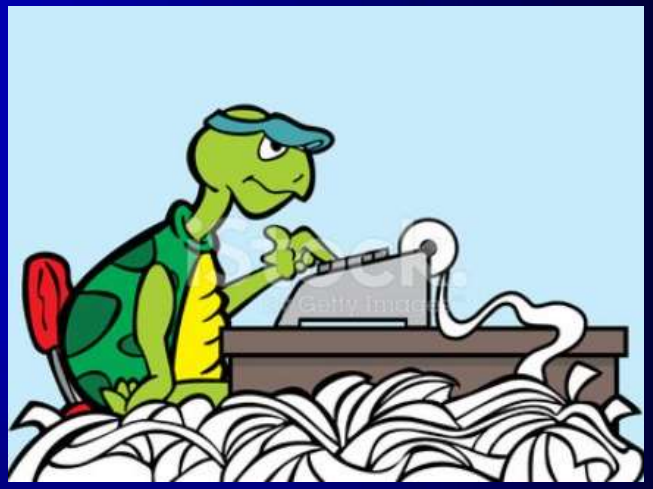
Collect and Collate Data

- For Bulk Drug Substance/Drug Product, calculations were a quandry.
  - In SAP, the amount is tracked based on the yield (kg for API and number of tablets for a drug product, as examples).
  - In the SPL, it is tracked by container
  - Decision was made to add up the total yield of batches per month, divide by the amount identified in the SPL and round up.

Collect and Collate Data

- Simplified example of the API bulk calculation:
  - 2 batches in June, both with a yield of 100 kg.
  - In the drug listing, the container (drum) is identified as holding 10 kg.
  - 200kg/10kg gives us 20 drums for June.



Review and Submit the Reports

- The collated data was reviewed by the SPL SME as well as each site's logistics.
- Decision was made to submit the data one report for one site.
  - We did see parsing errors.
  - We did occasionally have the program crash when uploading.

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Clarification Requests

- What would be FDA's guidance/preference on how we calculate the drug substance numbers?
  - How do we handle the calculation where the yield for a batch does not divide out exactly?
    - 75kg yield/10kg drum =7.5 drums
  - If we manufacture multiple batches in a month, do you want us to calculate each batch separately, or add them up and then calculate?
    - 2 batches with 75kg yield.
      - Combined:150kg/10kg= 15 drums
      - Separate 75kg/10kg=7.5 drums (if you round up this would be 16 drums, and if you round down it would be 14 drums)

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Clarification Requests

- For marketed product, which “release” should we use to identify the site that reports?
  - Site Release?
  - Market Release?

Questions

- Currently, we are reporting on both the distributed NDCs and the Manufacturer NDCs. In essence, we are double reporting the same information. Would it not be more value added to report on the distributed NDCs?
- At some point, I expect that FDA will introduce some type of arrears list for companies that have not submitted. Has FDA given any thought on whom they will notify? Possibly the contact identified in the labeler code request?

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Suggestions

- There has been a lot of discussion and confusion around whether sites that only package the finished marketed product are required to report. Clarification is needed on this topic. If they do need to report, consideration should be given to adding the "Label" business operation as it can represent the site where final packaging happened.
- Include an example of a complex supply chain identifying who is responsible for reporting on the different NDCs that would be in place to support.
  - An example of a complex supply chain is included on the next slide.
  - The slide following that depicts the possible reporting responsibilities.

Example of Complex Supply Chain

- Product “Beta” is distributed by Company Z under the NDC 9999-9999-99.
- API “Alpha” manufactured at Company A (NDC 1111-1111-11/ 25 kg per drum)
- API “Alpha” manufactured at Company B (NDC 2222-2222-22/ 35 kg per drum)
- Bulk Drug Product “Beta” manufactured at Company C (NDC 3333-3333-33/ 50,000 tablets per drum)
- Company D finish packs the bulk from Company C.
- Company E manufactures and packages the distributed product. Manufacturer NDC is 4444-4444-44.

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Reporting for the Complex Supply Chain

- Company A would report on NDC 1111-1111-11
- Company B would report on NDC 2222-2222-22
- Company C would report on NDC 3333-3333-33
- Company D would report on NDC 9999-9999-99
- Company E would report on NDC 4444-4444-44 and NDC 9999-9999-99
- Company Z would not have to report as the distributer.

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Experience from a Smaller Pharma Company

Smaller Pharma Process: Background and Groups Involved

- Specialty pharmaceutical company with large and small molecule drug applications
- Used release to market to define reporting numbers.
- Reported on any NDC that is contained in an SPL that they submit.
- Groups Involved
  - Regulatory Publisher
  - Regulatory Labeling
  - Quality and Supply Chain
  - Regulatory CMC

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Smaller Pharma Process:Group's Responsibilities

- Regulatory Publisher
  - Provided initial template and submitted the final result
- Regulatory Labeling
  - Provided the list of skus in scope based on DUNS/NDC
  - Developed the necessary calculations
  - Provided product specific templates to appropriate Quality and Supply Chain contacts for batch release alignment.
- Quality and Supply Chain
  - Populated Outermost Quantity Released by Month based on batch record review and SAP.
  - Calculated innermost Quantity Released.
- Regulatory CMC
  - Reviewed/verified completed template.

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Smaller Pharma Feedback

- Problem Encountered:
  - Companies had different intepretations on who should submit for this requirement.
- Suggestions for process:
  - Remove the need to report on innermost.
  - Template was very useful, but easily broken.
- Suggestions for Guidance:
  - Eliminate the need to submit the distributer NDC info because the info will already be provided in the manufacturer's submission. Would get rid of duplication.
  - Provide additional clarity around:
    - "agents" authorized by the manufacturer to submit on their behalf verses "FDA official authorized agent".
    - Manufacturer verses registrant.

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SPL Process Team

- The SPL Process Team is a free volunteer industry group where we discuss and provide assistance for SPL and related subjects.
- If you are interested in attending our monthly meetings, please reach out to our co-chairs and we will add you to our distribution list and forward the meeting invite.
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