Labelling of medicinal products

I. Introduction

In this document, the FAMHP provides some explanation on labelling and mock-up requirements for medicines for human use.

Labelling includes outer packaging and primary packaging. It is also possible that there is only primary packaging.
Labelling must be written in such a way that critical information necessary in order to use the medicinal product correctly and safely is clearly legible, easily accessible and comprehensible for all.
The information on the packaging must be approved by the Federal Agency for Medicines and Health Products (FAMHP). The information must correspond to the registration/marketing authorisation (MA), the summary of product characteristics (SPC) and the patient information leaflet, and must always be provided in the three Belgian national languages.

The information mentioned is important but the manner in which it is expressed is also important. This is why the mock-up must also be approved by the FAMHP. A mock-up is a two-dimensional draft design, in colour and employing the final font and character size, which gives a clear image of the three-dimensional presentation of the packaging.

II. Legislation and policy documents on labelling

- Law on medicinal products of 25 March 1964:
  - article 1: definitions;
  - article 6 §1*quinquies*, paragraph 5: general provision permitting the king to set the conditions that must be met by the outer packaging as well as the primary packaging;
  - article 6*septies,* paragraph 1: indication that the text on the outer/immediate packaging must be drafted in the three national languages;
  - article 6*septies*, paragraph 6: indication of the name of the medicinal product in Braille;
  - article 6*septies*, paragraph 7: possibility of exemptions (derogations).
- Royal Decree on human and veterinary medicinal products of 14 December 2006
  - article 53: list of data that must appear on the outer packaging, as well as on the primary packaging if there is no outer packaging;
  - article 54: list of data that must appear on the primary packaging;
  - article 56: additional data for the packaging of medicinal products registered according to the central procedure, as well as the possibility of signs and pictograms;
  - article 57: additional data for radionuclides;
  - article 58: additional data for plasma derivatives of human origin.
- Homeopathic medicinal products: Royal Decree on the registration of medicines of 3 July 1969, CHAPTER III. - (Provisions relating to the registration of homeopathic medicinal products.) <RD 1999-06-23/41, Article 10, 024; Entry into force: 03-09-1999>, Article 28*bis*
- QRD product information template
- EudraLex - Volume 2 - Pharmaceutical legislation on notice to applicants and regulatory guidelines for medicinal products for human use: guideline “Excipients in the labelling and patient information leaflet of medicinal products for human use” and annex to the European Commission guideline on “Excipients in the labelling and patient information leaflet of medicinal products for human use” (or EMA website)
- EudraLex - Volume 2 - Pharmaceutical legislation on notice to applicants and regulatory guidelines for medicinal products for human use: “Guideline on the readability of the labelling and patient information leaflet of medicinal products for human use”, including Braille requirements named as “Guideline on readability”.
- Product information reference documents and guidelines: QRD recommendations on the expression of strength in the name of centrally authorised human medicinal products (as stated in section 1 of SPC, and in the name section of labelling and PIL)

- Declaration of Storage Conditions in Appendix III to the QRD template
- Exemptions: procedure to be followed for medicines for human use.
- National guideline for the denomination of medicines for human use (Dutch version – French version).

III. QRD product information template

This template was drafted by the European working group "Quality Review of Documents" (QRD). This document explains how various fields should be completed in accordance with Belgian legislation. It is used as a basic reference document for packaging of medicinal products.
Below, you will find explanations on all mandatory mentions. For harmonised labelling, these instructions need to be followed strictly: exemptions are only permitted in a limited number of cases. For more information on this topic, see the document "Exemptions: procedure to be followed for medicines for human use".
The QRD template only contains information on what must be mentioned on the packaging.

A. Required particulars on outer packaging and primary packaging

1. Name of the medicinal product

The Law of 25 March 1964 defines the name is as follows:

> "the name, which may be an invented name, not to be confused with the common name, or a common or scientific name combined with a brand or the name of the marketing authorisation/permit holder."

The Royal Decree of 14 December 2006 states the following should appear on the packaging:

> "the name of the medicinal product, followed by its dosage and its pharmaceutical form and, where applicable, mention of the patient (infants or adults); when the medicinal product contains up to three active substances, the international non-proprietary name (INN) or, if this does not exist, the usual common name;"

The name is one of the distinctive characteristics of a pharmaceutical product and needs to appear alongside characteristics such as dosage and pharmaceutical form. The name must be indicated identically to the SPC and patient information leaflet.
"Name" stands for:

- an invented name;
- the INN plus the name of the marketing authorisation holder (MAH).

The rules for naming are explained in the document "National guidelines on the denomination of medicinal products for human use" (Dutch version – French version).

As has already been indicated, the chosen name above must then be followed on the packaging by the dosage, the pharmaceutical form and the active substance. If a pharmaceutical product is intended to be used exclusively by a particular age group, this age group (for example: newborns, infants, adults) can be part of this name. So, a grouping of distinctive characteristics appears on the packaging, ensuring a uniquely identification.

Ideally, the active substance(s) is (are) mentioned in the three national languages, in accordance with the "International Non Proprietary Name" (INN) recommended by the World Health Organization (WHO) or, in the absence of an INN, in accordance with the usual common name accepted at registration/authorisation. Active substances can also be indicated in Latin or English. For more information, see the "Exemptions: procedure to be followed for medicines for human use".

The way name, dosage, pharmaceutical form and active substance is explained in detail in the QRD-template. One important requirement in this area is that the reference to the active substance should always correspond to the dosage mentioned in or following the name. If the name of the product is made up of the general or scientific name and the name of the MAH, it is no longer compulsory to indicate the general or scientific name of the active substance again immediately adjacent (below or to one side) to the name on the packaging. Note: the complete name of the active substance must appear within the name (see also the document "Exemptions: procedure to be followed for medicines for human use").
The description of the pharmaceutical form should always correspond to the recommendations in the Standard Terms published by the European Council.

The aforementioned information can be presented in a number of lines and if necessary in various font sizes, provided that the reader perceives it as one text. "One text", means that the information should appear on the same side of the packaging and no other text can appear between the components making up the name of the medicinal product (the (invented) name, dosage, pharmaceutical form and active substances).

2. Statement of active substances

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the qualitative and quantitative composition in active substances by dosage units or, according to the form of administration, for a certain weight or volume, using the common names".

The composition should be indicated alongside the name, dosage and pharmaceutical form.

The composition must be mentioned in the three Belgian national languages, in accordance with the INN recommended by the WHO or, in the absence of an INN, in accordance with the usual common name accepted at registration/authorisation. Exceptions to the obligation to mention the composition in the three national languages are explained in the document "Exemptions: procedure to be followed for medicines for human use".

Just like the QRD European working group, the FAMHP imposes following requirements: for primary packaging and outer packaging, the qualitative and quantitative composition of the active substance(s) must be mentioned as follows:

- Per dose unit (tablet, "puff" in case of aerosols, etc.) or according to the form of administration for a particular volume or weight. The way in which the dosage should be expressed is indicated in the document "QRD-recommendations on the expression of strength in the name of centrally authorised human medicinal products" (as stated in section 1 of SPC, and in the name section of labelling and PIL). In certain cases, both quantity per dose unit and total quantity of packaging should be indicated. Total quantity per total volume can be very important because of safety aspects of injectable products.
- If the active substance is present in the product in the form of a salt, this should also be indicated clearly.

If more than one dosage is available for a given medicinal product, this dosage must also be expressed in the same way. For example: 250 mg, 500 mg, 750 mg, 1 000 mg and not 1 g. If possible, commas should be avoided, for example, 250 mg rather than 0,250 g.

If dosage is expressed in micrograms, this dosage unit must, for reasons of safety (confusion with milligrams), be written out in full. Only if this would cause practical problems, the abbreviation "mcg" may be used. Under no circumstances can the abbreviation "µg" be used, given the high risk of the Greek "mu" for "microgram" being confused with the "m" for "milligram". For more information see the document of the European Commission's, EudraLex - Volume 2C - "Guideline on readability".

3. List of excipients

The Royal Decree of 14 December 2006 states that packaging should mention:

> "a list of excipients that have a well-known action or effect and which are described in the detailed guidelines published by the European Commission in "The Rules governing medicinal products in the European Union", as laid down in the latest available version. However, if the product is injectable, or a topical or eye preparation, all excipients must be stated."

The European Commission has published a list of excipients that should always be mentioned (see EudraLex - Volume 2C - "Guideline on the excipients in the label and patient information leaflet of medicinal products for human use").

If a pharmaceutical product is intended for parenteral or topical use (i.e. not only medicinal products intended for external dermal use, but all medicinal products applied to the oral, nasal, rectal and vaginal mucosa), or if a pharmaceutical product is an eye preparation or is used for inhalation, all of the excipients must be indicated qualitatively.

Ideally, excipients should be indicated in the three Belgian national languages. Excipients can also be indicated in English or Latin. For more on this topic, see the document "Exemptions: procedure to be followed for medicines for human use".

The entire composition may of course still be indicated on the label of every pharmaceutical product.

4. Pharmaceutical form and content

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the pharmaceutical form and the content by weight, volume or dosage units".

Pharmaceutical form is thoroughly discussed in the section on the name of the medicine.

The complete content of the packaging must be name here. For example: thirty tablets.

Where applicable, included devices (and how many there are), such as needles, disinfectant swabs, etc., must also be mentioned. This might also, for example, include the attachment system for a drip bag.

Given that the importance for professional groups to know what form of packaging they will be handling, it is recommended that information on this subject is included on the outer packaging as well as on the label. This additional information relating to packaging form can obviously not be presented in a promotional manner.

5. Method and route(s) of administration

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the administration method and, if necessary, the administration route. A space must be provided to indicate the prescribed dose".

The statement "Read patient information leaflet before use" must always be included.

It is generally necessary to indicate the administration route if this cannot be concluded from the pharmaceutical form. The description of the administration route should always be given as described in the Standard Terms published by the European Council. Generally accepted abbreviations, for example "IV", are permitted (see also the document "Exemptions: procedure

to be followed for medicines for human use"). Negative statements cannot be used, for example "Not for intravenous use".

This category also includes technical indications for correct use of the medicinal product (for example: "Do not chew", or "Shake before use").

6. Special warning that the medicinal product must be stored out of sight and reach of children

The Royal Decree of 14 December 2006 states that packaging should include:

> "a special warning stating that the medicinal product must be kept out of the sight and reach of children".

The phrase "Keep out of the sight and reach of children" has to be printed on the packaging.

7. Other special warning(s), if necessary

The Royal Decree of 14 December 2006 states that packaging should include:

> "a special warning, if required for the medicinal product".

In particular cases, the FAMHP may request an additional special warning.

8. Expiry date

The Royal Decree of 14 December 2006 states that packaging should mention:

> a "clear indication of the expiration date (month/year)".

The last day on which the product is considered good to use must be clearly indicated. The month must be indicated by two figures or at least three letters and the year, written in four digits. If only the month and the year are indicated, the expiration date is considered to be the last day of that month. See also Appendix IV bij de QRD-template "Terms and abbreviations for batch number and expiry date to be used on the labelling of human medicinal products". The shelf life after opening of the primary packaging, or after dilution or reconstitution, must be indicated. If not, a referral to the patient information leaflet should be mentioned.

9. Special storage conditions

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the special storage conditions, if appropriate".

See also "Appendix III to the Quality Review of Document templates for human medicinal products". These indications only apply if submitted stability tests have been performed according to ICH guidelines.

10. Special precautions for disposal of unused medicinal products or waste materials derived from such medicinal products (if applicable)

The Royal Decree of 14 December 2006 states that "where applicable," packaging should mention:

> "the particular precautions relating to the disposal of unused medicinal products or waste derived from medicinal products, as well as reference to any collection system that may be implemented".

These indications should be mentioned in case of substances that present particular hazards, such as cytostatics or radiopharmaceuticals.

11. Name and address of the marketing authorisation holder

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the name or business name and permanent address or registered office of the marketing authorisation holder and, where applicable, the name or business name of the representative designated by the marketing authorisation holder".

The name of the marketing authorisation holder, alongside his address, should appear on the packaging. Possible included contact information includes postal address, telephone number, fax number, email address.
Packaging used in different countries should clearly mention which information is applicable to which country.

Concerning the address (including postal address), the rules are as follows: a post office box (plus city/town) is not acceptable. This cannot be considered as an address in the legal sense. The address must therefore comprise street, house number and city/town. The country name, preferably in the three Belgian national languages, should also be added if the MAH is not established in Belgium.

Indicating company form is allowed but not compulsory.

Mentioning an internet address (website) is not allowed.

The telephone number mentioned on the packaging should be the MAH's general telephone number. If a telephone number is mentioned, the MAH must guarantee that calls can be answered in all three Belgian national languages.
Mentioning special telephone numbers, which do not redirect to the MAH's number but transfer callers to special patient information programmes or patient help programmes, is not permitted. The same applies to 0800 numbers, unless they allow callers to contact the company or the local representative of the MAH directly, as indicated in field 6 of the patient information leaflet.

It quite allowed though, to mention, in addition to the MAH, the business name of a representative designated by the MAH. This is only possible if this representative is also mentioned in section 6 of the patient information leaflet as a local representative and this capacity of local representative is indicated on the packaging.

The distributor's name cannot be mentioned as such, because he assumes no responsibility in marketing the product. An exception to this arises if the representative of the MAH, whose contact details are mentioned as an "alternative address for correspondence and information", is the distributor as well. This representative can obviously be indicated by name, albeit exclusively in the context of his role as "representative for correspondence and information". The representative role for correspondence and information must therefore be indicated clearly before the name of this representative. It is not permitted to explicitly indicate the capacity of distributor, given that the term "distributor" creates confusion regarding to who is really responsible for marketing the product. In other words, whether or not this responsibility is included in the capacity of distributor.

12. Marketing authorisation number

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the marketing authorisation number".

This is a unique number composed of the letters BE followed by six digits (for example: BE123456).

13. Batch number

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the manufacturing batch number".

The batch number must be a characteristic combination of figures and/or letters that identifies a specific batch in accordance with the European GMP guideline (EudraLex - Volume 4: Good Manufacturing Practices). See also Appendix IV bij de QRD-template "Terms and abbreviations for batch number and expiry date to be used on the labelling of human medicinal products".

14. General classification for supply

The supply status of a medicinal product is established by the FAMHP and must be mentioned on the packaging (see the document "Blue-box requirements").

This information is mandatory in case of:

- a prescription-only medicinal product. Packaging should mention "prescription medicinal product" or "on medical prescription";
- a non-prescription medicinal product. Packaging should mention "Medicinal product not subject to medical prescription" or "Not subject to medical prescription" or "Non-prescription";
- a medicinal product available on written request. Packaging should mention "Medicinal product available on written request" or "on written request", in accordance with the order of the Regent Decree of 6 february 1946.

15. Instructions for use

The Royal Decree of 14 December 2006 states that packaging should mention:

> "the indication of uses for medicinal products not subject to medical prescription".

In case of medicinal products not subject to medical prescription or medicinal products available on written request, the following should be indicated:

- indication(s) (pharmacotherapeutical group if described patient-friendly or all of the indications). The indication must be printed in a uniform format (for example no parts in bold or italic);
- dosage, contra-indications and warnings. If the packaging is too small, there must be at least one referral to the patient information leaflet;
- for certain medicinal products, general information and warnings concerning overdose may be required.

16. Information in Braille

The medicinal product's name should also be put on the outer packaging in Braille. From a practical point of view, it is acceptable to add dosage and pharmaceutical form only if multiple dosages and/or pharmaceutical forms of the medicinal product are available.
If the dosage is expressed in micrograms, it is sufficient to indicate "mcg" in Braille. If there is no outer packaging, information in Braille must be put on the primary packaging. Some exceptions are noted in "Exemptions: procedure to be followed for medicines for human use".
In Belgium, "Louis Braille" script is used. Concerning the size of Braille characters, Marburg Medium is strongly recommended.

17. Unique Identifier – 2D data matrix codes

2D Barcodes incorporating the unique identifier may be included.

18. Unique Identifier – human readable Data

The product code, serial number or any other number used for identification (and/or national reimbursement) of the medicinal product, that is present in the 2D Barcode must also appear in this section.

More information on unique identifiers (2D and human readable data) can be found in the " "Falsified Medicines Directive and de Commission Delegated Regulation"
In case more than one code is used (2D matrix code, Barcode, CNK code, QR code, these should be put on different panels of the packaging, to avoid scanning difficulties.

19. Specific requirements or "blue box requirements"

"Blue-box requirements" can be consulted on the HMA's website.

- Delivery mode, see section "14. General classification for supply".
- All main anaesthetics and psychotropic substances that are subject to a specially regulated notice should bear a code. This code needs to be mentioned on outer packaging. If there is no outer packaging, it should be mentioned on primary packaging.
- Pictogrammes on medicines for topical use. Placing an orange triangle on outer and –if possible- primary packaging of medicines for topical use is strongly recommended. This orange triangle needs to bear following inscription:

  "Uitwendig gebruik/Usage externe/Ausserliche anwendung" te vermelden.

  The same goes for the alert stamp in relief, recognisable upon touching it. This alert stamp comes in the form of an equilateral triangle with a side size of 18 mm (+/- 0,2 mm). Line thickness should be 1,7 mm (+/- 0,2 mm). About 2 mm above this triangle, a dot with a diameter of 1,7 mm (+/- 2 mm) is placed. The relief in all of these elements needs to be between 0,25 mm and 0,5 mm in height. For small packaging, a smaller format applies: 9 mm (+/- 1 mm) sides and a line thickness of 1 mm (+/- 0,2 mm). Relief height remains the same. In principle, the alert stamp will be placed at a maximum distance of 50 mm from the packaging base. On small packaging however, it can be placed anywhere on the packaging.

B. Required minimum particulars on blisters or strips packaging

1. Name of the medicinal product

This point is discussed in detail in III.A.1 Name of the medicinal product. Just as for the outer packaging, here too, the (invented) name is followed by dosage and pharmaceutical form, and the active substance(s) must be mentioned. In certain cases, exemptions are possible. For more on this topic, please read the document "Exemptions: procedure to be followed for medicines for human use".

2. Marketing authorisation holder name

This point is discussed in detail in III.A.11 Name and address of the Marketing authorisation holder. Please note only the (commercial) name of the marketing authorisation holder (MAH) should be indicated and not that of the local representative designated by the MAH.

An exemption is possible in case of small packaging, provided that the MAH's full name is already included in the name of the medicinal product. For more information, see the document "Exemptions: procedure to be followed for medicines for human use".

3. Expiration date

This point is discussed in detail in III.A.8. Expiry date.

4. Batch number

This point is discussed in detail in III.A.13. Batch number.

5. Other

Other information necessary in order to use and administer the product correctly.
Certain information necessary for using and administering the product correctly may be indicated on blister packaging (for example: calendar indications).

If the blisters contain empty units, this can best be indicated on these units. Preferably, this information is mentioned in the three Belgian national languages. This to avoid possible confusion about the number of tablets present.

6. Specific requirements or "blue box requirements"

This point is discussed in detail in III.A.19 Specific requirements or "blue box requirements".

C. Required minimum particulars on small primary packaging units

Small packaging is defined as follows as: bottles (of tablets), vials (for injection) bottles and ampoules with a content of up to 100 ml; tubes with a content of up to 50 ml or 50 g; pouches and patches with a surface area of up to 36 cm^2 (see also the document "Exemptions: procedure to be followed for medicines for human use").

1. Name of the medicinal product and route(s) of administration

This point is discussed in detail in III.A.1 Name of the medicinal product. On small primary packaging units too, the (invented) name is followed by dosage and pharmaceutical form, and active substance(s) must be mentioned. The administration route(s) must also be indicated here. The information relating to the administration route(s) has also been discussed earlier in this document. In certain cases, exemptions are possible. For more on this topic, please consult the document "Exemptions: procedure to be followed for medicines for human use".

2. Method of administration

This category includes technical indications for using the medicinal product correctly (for example: "Do not chew", "Shake before use"). If not all these can be mentioned on the packaging, a referral to the patient information leaflet must be included: "Read patient information leaflet before use".

3. Expiry date

This point is discussed in detail in III.A.8. Expiry date.

4. Batch number

This point is discussed in detail in III.A.13. Batch number.

5. Content by weight, volume or unit

This point is discussed in detail in III.A.4. Pharmaceutical content.

6. Other

If there is enough space available, any other information necessary for using and administrating the medicinal product properly and correctly can be mentioned here (for example storage conditions).

7. Specific requirements or, "blue box requirements"

This point is discussed in detail in III.A.19 Specific requirements or "blue box requirements".

IV. Mock-up

As mentioned before, the QRD-template only covers what needs to be mentioned on packaging.
But the way in which the elements are indicated on the packaging is important as well (font size, use of colours, lay-out, etc.).

The guidelines on indicating this in the best way possible are available in the EudraLex - Volume 2C "Guideline on the Readability of the Label and Patient information leaflet of Medicinal Products for Human Use" (Guideline on readability).

A "Mock-up" is a two-dimensional draft design, which is an exact reproduction of the packaging as it will be placed on the market. Namely: a draft design in the final colour, with the final font, final character size and final lay-out, which gives a clear image of the three-dimensional presentation of the packaging.
The dimensions of the packaging (or the label) and the size of the characters should be indicated in the mock-up.
Submit the smallest (marketed) packaging so the worst case scenario can be evaluated.
If a packaging size is not marketed, a Post Approval Commitment (PAC) can be used. The next commercialised packsize should then be submitted.
On existing mock-ups, sticky notes with modifications to be made are only permitted if a correct readability assessment is still possible (i.e. limited modifications).

A. Readability

As indicated in the EudraLex - Volume 2C "Guideline on readability", the particulars appearing on the label of all medicinal products should be printed in characters of at least 7 points (or of a size where the lower case "x" is at least 1.4 mm in height), leaving a space between lines of at least 3 mm. Smaller character sizes will be evaluated on a case-by-case basis, with regard to readability.

On blister and strip packaging, it is permitted to indicate certain data (for example batch number, expiration date, etc.) using embossed instead of printed text.
Avoiding repeated mentions improves readability. If, for example, referral to the patient information leaflet is necessary in more than one section, it is sufficient if "Read patient information leaflet before use" appears on the mock-up only once.

- Readability – technique
  In order to facilitate readability, requirements have been imposed and advice is given in section B of the EudraLex - Volume 2C "Guideline on readability", concerning the name of the medicinal product, strength and total content, route of administration, design and lay-out, blisters and small packaging.
- Position of the information
  Critical information (name, active substance, administration route …) is best put in one place. It should not be interrupted by other information, logos or graphical elements.
  The name of the medicinal product should be mentioned on at least three non-opposite sides of the packaging, if the packaging allows this.
- Keep logo and name separate from each other to reserve adequate space for useful information. More information on logos can be found in IV.C. Logos, signs and pictograms.
- Use quality printing
  - Avoid printing on glass directly to guarantee optimal readability.
  - Selection colour and font for blisters carefully. Readability is impacted by the nature of the material (glare or reflection on a metallic layer).
- Exemption from using the three national languages
  Exemption from using the three national languages will only be granted in very particular cases. For more information, please read the document "Exemptions: procedure to be followed for medicines for human use".

B. Sufficient distinction

To avoid medication errors, it is necessary that the packaging of different pharmaceutical forms and strengths, as well as other products by the same permit holder or possibly other permit holders as well, are easily distinguishable from one another.

Recommendations for distinguishable packaging:

- colour differentiation (on box, label, vial sealing caps, etc.);
- colour reversal (= white letters on a coloured background), use of yellow background or use of contrast;
- use of tall man lettering (= use of capitals in parts of the name of a medicinal product to distinguish it from medicinal products that look or sound alike to avoid medication errors).

Avoidance of colour branding: colours are best not used to be able to distinguish a specific permit holder, but only to improve the visibility of critical information on the label and for differentiation with the other medicinal products.

Injection vials: avoidance of vials with similar dimensions and sealing caps with the same colours within the same range. These elements are important to make a distinction and so avoid medication errors.

Injectable preparations: clear indication of concentration and total volume/content. Make sure these two are easily distinguishable from one another.
Total volume can be emphasized by sensible use of colour and font size.

C. Logos, signs and pictograms

The Royal Decree of 14 December 2006 states

> "The outer packaging and the patient information leaflet may include symbols or pictograms designed to clarify certain information mentioned in Articles 53 and 55, paragraph 1, and other information compatible with the SPC which is useful to the patient, to the exclusion of any element of a promotional nature."

This article permits the inclusion of signs or pictograms (intended to make compulsory data based on articles 53 and 55 explicit), as well as other data.
The label may not include any data, logo, sign or pictogram that:

- is contrary to the SPC text approved by the FAMHP;
- concerns information promoting the use of the product.

Signs, illustrations or pictograms can only be used for clarification and cannot replace compulsory text.
Illustrations and pictograms must always be accompanied by an explanatory text. Logos, illustrations, signs and pictograms must have a clear added value.
Whether or not the signs, illustrations or pictograms are accepted, depends on whether the definitions, principles and control criteria below are respected.

1. Definitions

- Signs and pictograms: standardised symbols and simple, stylised illustrations used to express information or an indication in an unequivocal manner;
- Logos: recognisable signs or distinctive marks of a particular legal person (for example the MAH), with a fixed design;
- Illustrations: all graphical illustrations other than logos, signs or pictograms.

2. Principles

On evaluation, the packaging is evaluated as a whole, in order to see whether the total composition is still clear and coherent.
Although it is often said that "a picture is worth a thousand words", graphical information has its limits. Illustrations on packaging must therefore always be evaluated according to the

(corresponding) explanations, which give information on the patient information leaflet or on labelling.

Signs, pictograms and other illustrations can only be used for clarification and cannot replace compulsory text. Should an agreement be reached concerning standardisation of pictograms, the MAHs will be obliged to always use these pictograms. MAHs can also voluntarily put logos or other illustrations on packaging, provided that they meet the control criteria.
Graphical elements for MAHs are also important in distinguishing products from one another.

3. Control criteria

Should the MAH want to put signs, pictograms, logos, illustrations or other data next to compulsory informative texts on the packaging of a medicinal product, then the MAH needs to make sure they meet the following general criteria:

- **Not contradicting approved SPC or text on the packaging of the medicinal product:**

The SPC text and the corresponding patient information leaflet constitute the basis for all communication relating to the medicinal product and therefore also for the information that provided on packaging. The aim however, is not to repeat the SPC text verbatim. The compulsory wording on the packaging must be derived from the SPC text but should be formulated in a way that is easy for the user to understand.

- **Complying with the guideline on readability:**

The choice of colours and the clarity of graphical elements cannot have a negative impact on readability of compulsory wording on the packaging.
In regard to their dimensions, graphical elements cannot dominate and must, in terms of choice of colours/clarity, be subordinate to the minimal compulsory text. They should therefore not distract users' attention from the compulsory text.

- **Not being untruthful:**

It is obviously not permitted to suggest on packaging that the product has properties that it does not possess, such as a wider range of indications for the medicinal product, or exaggeration of its efficiency.

- **Not causing confusion:**

The purpose, among others, of signs, pictograms and other illustrations, is to clarify textual information on the packaging of a medicinal product.
If too much visual imagery is present on the packaging, the explanatory purpose is lost.
This would also apply in cases where an illustration is so complicated that it would not be understood by the average consumer.
Therefore, the aim is, for example, to standardise pictograms illustrating particular precautions, so that everyone understands a given pictogram in the same way.
Clear and correct pictograms themselves could also lead to confusion in certain cases, for example when they are combined. This must be avoided.
The product must always remain identifiable as a medicinal product and an illustration may not lead to misunderstanding the nature of the product (for example, it being mistaken for sweets).

- **Not going against the norms of good taste and decency:**

During the design phase, due regard should be given to the fact that illustrations do not evoke any undesirable association (offensive, racist, discriminatory, sexist, pornographic, blasphemous, etc.) in the minds of users (or some of them).

- **Not being presented in a promotional manner:**

Any form of information relating to a product can contribute to users' preference for that product and therefore could appear promotional at a certain level. The choice of graphical form can also be a determining factor in the product's perceived attractiveness. However, the

purpose of illustrations should be to provide visual information intended to clarify compulsory text.
This is why the FAMHP chooses not to authorise photographs on packaging (except to illustrate the pharmaceutical form).

Illustrations of plants or fruit (for example for clarification of the taste) are not accepted either. The indication of the taste, written in full, (for example strawberry taste) is sufficient for the correct identification of the medicinal product.
On packaging of plant-based medicinal products only images of the active plant (components) are permitted.

- **Contributing to health information:**

Information on packaging is intended to promote correct use of the medicinal product. In a single case, and only if clear reasons are being given, a written text can be supported by graphical elements, thus contributing to health information.

Please note the addition of a pictogram is examined and evaluated internally.

4. Specific remarks regarding illustrations

Certain illustrations are difficult to standardise and it is not generally deemed desirable by MAHs to do so, as images are a determining factor for the identity of the company or the product.

Following illustrations (graphical elements) are allowed **without specific conditions**:

- abstract (stylised) lay-out elements such as lines, arches, circles and background colours, without any other meaning and provided that the readability of the textual information is not compromised. Priority should be given to sober graphical elements. Exuberant loops or excessive use of graphical elements such as flowers should be avoided.

Following illustrations (graphical elements) are allowed **under certain specific conditions**:

- **Pharmaceutical form** (potentially a photograph): such an illustration may cause no confusion regarding the pharmaceutical form. There must be no ambiguity regarding the pharmaceutical form in question (attention in case of solutions, suspensions, etc.). Furthermore, the illustration of the pharmaceutical form must correspond exactly to its actual form and appearance. This means that if there is a break line, it should appear on the illustration as well.

- **Particular administration devices**: such an illustration can be allowed, provided that the illustration is subordinate to the compulsory elements on the packaging.

- **Depiction of the target group**: an illustration depicting the target group is allowed only if the medicinal product is intended for a single targeted group. This applies especially if children are the target group. In this case, particular attention should be given to indicating the age category. The illustration may not in any way suggest another age category than that for which the product is intended. Therefore, the age category must be explicitly mentioned next to or within the illustration. A toy does not designate children as the target group explicitly enough, therefore it is neither functional nor acceptable. Furthermore, this may lead children to misunderstand the nature of the product and attract them to it in an undesirable manner.

- **Administration / treatment site**: a stylised illustration indicating the part of the body in which the affliction to be treated is present and to which the medicinal product may also be administered; for example, an ear on a medicinal product for treating earache, a nose on a nasal decongestant, or a foot on a medicinal product for athlete's foot. This is obviously only permitted if the medicinal product can only be administered to a single site.

- **Depiction of the indication**: depicting the indication will only be possible in some cases and only if it covers all registered indications. This prevents an illustration that does not cover all of the registered indications for the product from appearing on the packaging. Depicting the indication will therefore mostly be the case for products for which there is only one indication. Only then will visual information be sufficient and confusion avoided. Therefore it is not, for example, allowed to illustrate just a headache or just a backache on an analgesic that is also registered for other conditions.
  The image must correspond to the indication, but must also be particularly well thought out and clear (a person coughing can therefore not be mistaken, for example, for a person vomiting).
  The illustration may not in any way give the impression that the medicinal product may also be used for indications for which it has not been registered. This could for example be the case if, in addition to a stomach, an œsophagus is also illustrated on a product that is only registered for stomach aches and not for acid refluxes.
  Finally, the illustration should in principle be a stylised reproduction of the indication.

D. Use of trademarks, the symbols ® and TM, the indication "Brand of", etc.

The use of trademarks as the symbols ® and TM are allowed on labelling since they indicate that the company has a patent on the name.

Trademark statements or things like "Brand of", etc. are not allowed. As they cannot be considered useful to the patient, and could be regarded as an element of promotional nature. Therefore, in principle, such statements should not be included on the packaging unless the non-inclusion of such trademark statement would constitute a breach of trademark law. The same principle applies to licence contracts between different companies and to copyright indications. In accordance with the Q&A Pre-authorisation guidance" (question 3.1.5).

E. Use of logos

The only logos allowed on packaging are those of the MAH of the medicinal product and their representative for correspondence and information (local representative). If the logo of the local representative is used, it must be placed next to the text on the local representative. The logo of the local representative is only allowed if the logo of the MAH is also present. This precludes any possible confusion and ambiguity concerning the MAH.

Concerning the logos, there can be no question of any indications that might be interpreted as promotion of the product, for example: "MAH (Marketing Authorisation Holder) X – for better health" is not allowed.
The logo can only contain objective, truthful and non-promotional information.
These logos can only be included if there is sufficient room for them on the packaging. They cannot have a negative impact on readability of the compulsory information.

F. Mobile Scanning Technology

The QR code may be added under Article 56 of the Royal Decree of 14 December 2006:

> "The outer packaging and the patient information leaflet may include symbols or pictograms designed to clarify certain information mentioned in Articles 53 and 55, paragraph 1, and other information compatible with the SPC which is useful to the patient, to the exclusion of any element of a promotional nature."

The QR code may be added to the packaging provided that it is subordinate to the information described in Articles 53 & 55 of the Royal Decree of 14 December 2006 and that it does not compromise readability. The QR code may not replace the information described in Articles 53

& 55 of the Royal Decree of 14 December 2006. This information must also remain available in the form of text.

For the positive list of acceptable content, please refer to the CMDh document "CMDh position paper on the use of Mobile scanning and other technologies to be included in labelling and PIL in order to provide information about the medicinal product".
QR codes incorporating batch number, expiration date, BE number, codes for traceability or quality control (CNK, GTIN, etc.) can be added during an ongoing procedure with an impact on mock-ups. The content of the QR code must be described in the file.
For all other content, case-by-case evaluation by submitting a variation or notification will be necessary.

V. Some particularities

A. Packaging to be used in more than one country

Packaging to be used in more than one country is acceptable if following conditions are met:

- all data are indicated in all three Belgian national languages;
- there is a common name (and a common MAH in the event that the name = INN + MAH);
- classification for supply is identical;
- readability is not compromised;
- it is clearly indicated what data apply to each country.

B. Labelling of ready-made medicinal products

The FAMHP is aware that MAHs sometimes wish to place (very) large packaging on the market. This type of packaging (the specifications of which should simply be set out in the authorisation file) is not intended to be dispensed (by the pharmacist) directly to a patient, but is intended to serve as stock for pharmacist to use to provide the desired quantity to a number of patients. The labelling of (very large) packaging will therefore need to meet the normal requirements of (primary) packaging. In case of the indication of the product name in Braille, an exemption may be obtained. For more on this topic, please read the document "Exemptions: procedure to be followed for medicines for human use".

C. Labelling of radiopharmaceutical medicinal products

In addition to what has already been indicated above in III. QRD product information template, the packaging of radiopharmaceutical medicinal products should also mention:

- the name or chemical symbol of the radionuclide;
- the name of the batch releaser;
- the international symbol for radioactivity.

As already mentioned, an exemption can be obtained for primary packaging (and lead outer surface) of radiopharmaceutical medicinal products to allow data on the primary packaging to be in English only. Other exemptions are also possible, please read the document "Exemptions: procedure to be followed for medicines for human use".

D. Labelling of combined packaging

Combined packaging contains two or more active substances in (more than) one distinct form of administration.

The aim of combined packaging is to improve patient medication compliance.
Examples: a box with one alendronate tablet and six pouches of effervescent calcium/vit. D granules, a box with one risedronate tablet and six calcium carbonate tablets.

For more on the denomination rules for combined packaging, please read the document "National guidelines on the denomination for medicinal products for human use" (Dutch version – French version).

For outer packaging and intermediate packaging (weekly unit):

A combinatieverpakking van X en Y	A boîte combinée de X et Y	A Kombinationspackung (combined box) von X und Y (X and Y)

A = name of combined packaging
X and Y = individual names of component products

However, if various forms of administration are packaged in a single blister, there is no individual packaging for X and Y, and therefore no individual denomination is attributed to X or Y. The immediate packaging must however unequivocally indicate from which active substance each tablet is made.

Example:

MAH

	Jour 1 (Day 1) Risedronate 35 mg *comprimé* (tablet)	← *Commencez ici* (Start here)

Lot n (Batch n)

Jour 2 (Day 2) *Calcium 500 mg Vitamine D 880 IU comprimé effervescent* (effervescent tablet)	*Jour 3* (Day 3) *Calcium 500 mg Vitamine D* 880 IU *comprimé effervescent* (effervescent tablet)	*Jour* 4 (Day 4) *Calcium 500 mg Vitamine D 880 IU comprimé effervescent* (effervescent tablet)

Exp.	*Jour* 5 (Day 4) *Calcium 500 mg Vitamine D 880 IU comprimé effervescent* (effervescent tablet)	*Jour* 6 (Day 6) *Calcium 500 mg Vitamine D 880 IU comprimé effervescent* (effervescent tablet)	*Jour* 7 (Day 4) *Calcium 500 mg Vitamine D 880 IU comprimé effervescent* (effervescent tablet)

NAME A

Batch numbers:
Batch number xxx is indicated on the individual packaging of X.
Batch number yyy is indicated on the individual packaging of Y.
Both (xxx and yyy) are indicated on the outer packaging of the combined packaging.

However, if various forms of administration are packaged in a single blister, there is no individual packaging for X and Y, and therefore no individual denomination is attributed to X or Y.

Marketing authorisation number:
The combined packaging receives its own authorisation number.
If there is intermediate packaging (weekly unit), this must receive the same authorisation number as the combined packaging.

E. Labelling of plant based medicinal products

In case of plant-based medicinal products, the following document may also be relevant in relation to packaging:

- "Guideline on declaration of herbal substances and herbal preparations1 in herbal medicinal products/Traditional herbal medicinal products".

The following points apply specifically to plant-based medicinal products:

- Concerning the name of the medicinal product: for plant-based medicinal products, the dosage should not be systematically included in the name. Particulars associated with the expression of active substances for plant-based medicines may be found in the "Guideline on declaration of herbal substances and herbal preparations1 in herbal medicinal products/Traditional herbal medicinal products".
- In case of registration as a traditional plant-based medicinal product, the registration number is defined as follows: BE-TU 123456.

F. Labelling of homeopathic medicinal products

- "Homeopathic medicinal product" must be indicated in the labelling.

- The authorisation number in accordance with article 16 is defined as follows: HO-BE123456.

- In case of homeopathic medicinal products registered according to the simplified procedure (Article 14), following indications must appear on the label:

  1. In case of homeopathic medicinal products for human use, in addition to the indication "Homeopathic medicinal product registered according to the special simplified procedure":
     a. the scientific and/or usual common name of the stock(s) followed by the degree of dilution, using the symbols from the pharmacopoeia used in accordance with paragraph 1;
     b. the name and address of the party responsible for placement on the market and, where applicable, the manufacturer;
     c. the administration method and, if necessary, the administration route;
     d. the expiry date, clearly (month, year);
     e. the pharmaceutical form;
     f. the volume of the sales model;
     g. the particular storage precautions, if appropriate;
     h. the special warning, if required for the medicinal product;
     i. the manufacturing batch number;
     j. the registration number;
     k. a warning advising the user to consult a doctor if symptoms persist.
  2. In case of homeopathic medicinal products for veterinary use, in addition to the indication "Homeopathic medicinal product for veterinary use registered according to the special simplified procedure" and indication of the target species, the wording mentioned in points a. to j. of 1. (cfr supra) should appear as well.
  3. Small primary packaging on which it is impossible to mention the indications provided for in 1. (cfr. supra) must, in addition to the indications "Homeopathic medicinal product registered according to the special simplified procedure" or "Homeopathic medicinal product for veterinary use registered according to the special simplified procedure", contain at least the following information:
     - the name of the medicinal product and, if necessary, the dosage and the administration route;
     - the administration method;
     - the expiration date;
     - the manufacturing batch number;
     - the content in weight, in volume or in units.

- The registration number according to article 14:
  - for a unitary component without indication: HO-BE-UH123456
  - for a complex without indication: HO-BE-CH123456

G. Labelling of parallel imported medicinal products

The requirements for labelling apply to in parallel imported medicinal products. Following points especially apply :

- Packaging should not only mention the name in Belgium but should also mention the original name of the medicinal product as it exists in the country of origin. The name of the country of origin should be preceded by the indication "Original name in the country of origin". Given that only the name in Belgium can appear on the primary packaging, it may be useful to add a sticky label bearing the original name to the primary packaging. In case of blister packaging, this label may not hide the formulation of the tablets.
- Packaging should clearly state the name and address of the importer (= parallel importation authorisation holder), preceded by "Imported by".

- Packaging should clearly state the name and address of the importer (= parallel importation authorisation holder), preceded by “imported by and repacked under the responsibility of”.
- Packaging should mention name and address of the foreign MAH for the imported medicinal product, preceded by “marketing authorisation holder for the imported medicinal product”.

The outer packaging of the medicinal product for parallel import must mention the same data as what’s on the packaging of the reference medicinal product in the three Belgian national languages.

Warning texts concerning the target or contra-indicated population as well as the pictograms related to these warning texts that are present on the Belgian reference product should also be present on the labelling of the parallel imported medicine.
Warning texts concerning excipients with known effect that present in the parallel imported medicine should also be mentioned on the labelling, even if these excipients are not present in the Belgian reference product.

If the primary packaging of the reference medicinal product includes data on the use of the medicinal product, the primary packaging of the medicinal product for parallel import must also mention this data in the three Belgian national languages. If the imported medicinal product employs calendar packaging, the days of the week should also be mentioned in the three Belgian national languages.

If blister packs are cut, it must be ensured that no information is cut off.
The batch number that should be indicated on the label and packaging of the medicinal product for parallel import is the batch number allocated by the manufacturer in the member state of origin.