GLOSSARY

Bulk Product: A product that has completed all processing stages up to, but not including, final packaging.

Contract Manufacturer: Any person who manufactures any product on the order of another person to whom a manufacturer's licence has been issued under these Regulations (*as defined in Regulation 2, CDCR 1984*)

Finished Product: A product that has undergone all stages of production and quality control, including packaging in its final container and labelling.

Indigenous Medicine: As defined under Regulation 2, the CDCR 1984, indigenous medicine means a system of treatment and prevention of disease established through traditional use of naturally occurring substances.

Licensed Importer: A person to whom an import license has been issued under Regulation 12, CDCR 1984 (*as defined in Regulation 2, CDCR 1984*)

Licensed Manufacturer: A person to whom a manufacturer's licence has been issued under these Regulations, and includes a contract manufacturer (*as defined in Regulation 2, CDCR 1984*)

Licensed Wholesaler: A person to whom a wholesaler's licence has been issued Regulation 12, CDCR 1984 (*as defined in Regulation 2, CDCR 1984*)

Manufacturer: A person carrying out one or more of the steps specified in the definition of manufacture.

Manufacture, in relation to any product includes –

a) The making or assembling of the product;
b) The enclosing or packing of the product in any container in a form suitable for administration or application, and the labelling of the container and;
c) The carrying out of any process in the course of any of the foregoing activities.
(*as defined in Regulation 2, CDCR 1984*)

Medicinal Product: The term refers to 'product' as stated in Regulation 2, CDCR 1984 which is applicable to pharmaceutical and natural products

OTC: Refers to Generic product (Non-Scheduled Poison)

Product Owner: A person, company or entity who is the legal/ registered owner of the product formulation and/or process with whom the marketing authorization holder has a contract *(glossary used in ACTD and ACTR).*

Product Registration Holder: The company or corporate or legal entity in the field of pharmaceuticals whose name the marketing authorization has been granted. This party is responsible to all aspects of the product, including quality and compliance with the conditions of marketing authorization. The authorized holder must be subjected to legislation in the country that issued the marketing authorization, which normally means being physically located in that country *(glossary used in ACTD and ACTR)*.

Repacker: *Please refer *"Explanatory Notes for Repackers"* as below

The Authority: Refers to Drug Control Authority (DCA)

The System: Refers to QUEST system in website of NPRA

EXPLANATORY NOTES FOR REPACKERS

1. Introduction

This chapter is intended to provide guidance to those engaged in repackaging of finished products with the aim to provide information to any person/ establishments who removes finished products from their original container-closure system and repackages them into a different container-closure system for sale and/or for distribution.

2. Objectives

a) To provide uniform guidance and a means of assessing the operations of repackers/ relabelers as they relate to the provisions of the GMP and GDP requirements.

b) To identify the type of repacking activity and whether there is a need to comply with GMP and GDP requirements.

3. Definitions

Terms	Definitions
Manufacture	Manufacture, in relation to any product includes – a) The making or assembling of the product; b) The enclosing or packing of the product in any container in a form suitable for administration or application, and the labelling of the container and; c) The carrying out of any process in the course of any of the foregoing activities.
Packaging	All operations, including filling & labelling, that a bulk product has to undergo in order to become a finished product. Filling of a sterile product under aseptic conditions or a product intended to be terminally sterilized, would not normally be regarded as part of packaging.
Packaging Material	Any material employed in the packaging of a material or product or cosmetic, including any other packaging used for transportation or shipment. Packaging materials are referred to as primary or secondary according to whether or not they are intended to be in direct contact with the product.
Printed packaging material	Packaging material which is imprinted with text or numbers or a combination of both.
Labelling	The term 'labeling' designates all labels and other written, printed, or graphic matter upon, or in, any package or wrapper in which it is enclosed, except any outer shipping container. A shipping container, unless such container or the outside of the consumer package, is exempted from labelling requirements.
Labeller/ relabeller	A company that affixes the original label to a finished product (i.e labeller) or changes in any way the labelling on a product without affecting the product or its container (i.e. relabeller).
Packaging system	Composed of a container system with its closure. This system may include several layers of protection for the Pharmacopeia preparation along with any sealing devices, delivery devices, labelling and package inserts.

Terms	Definitions
Repacker	A company who removes a finished product from its final packaging and places the finished products into a different container which is labelled or to be labelled before the product is for sale and/or distribution for human use. Repacker may consist of primary and secondary repacker.
Primary repacker	A company who performs repacking activity that places the finished products into a primary/ immediate container which labelled or to be labelled before the product is for sale and/or distribution for human use.
Secondary repacker	A company who does the repacking activity relating to a) labelling of the product container; and/or b) packing the finished product which is already enclosed in its labelled primary container into a carton which is labelled or to be labelled. before the product is for sale and/or distribution for human use.

4. Examples of types of repacking activity

No.	Description of Repacking Activity	Require GMP/GDP Control	Product to be included in Manufacturing License List	Responsibility	Remarks (If any)
1.	Packing/ blistering of imported product (tablet/capsule/liquid/etc.) into a different container	√	√	Primary repacker	
2.	De-blistering of blister strips of tablets/capsules to repack into a new blister pack/container	√	√	Primary repacker	e.g. Blister packs de-blistered and repack into new blister pack due to market purposes, etc.
3.	To form a secondary packaging material (unit box) to pack blister strips, bottles, etc. into this packaging material	√	√	Secondary repacker	e.g. 5 strips in a unit box to be repack to 1 strip in a unit box
4.	To affix an immediate label to a container of product that contains information such as Product Name, Dosage Form, Name of Active Substance(s), Strength of Active Substance(s), Batch Number, Manufacturing Date, Expiry Date, Route of Administration, Storage Condition, etc.	√	√	Primary repacker/ Secondary repacker	Refer Appendix 9: Labelling Requirement for Immediate Labels
5.	To affix label of outer carton that contains information such as Product Name, Dosage Form, Name of Active Substance(s), Strength of Active Substance(s), Batch Number, Manufacturing Date, Expiry Date, Route of Administration, Storage Condition, etc.	√	√	Secondary repacker	Refer Appendix 9: Labelling Requirement for Unit Outer Carton

No.	Description of Repacking Activity	Require GMP/GDP Control	Product to be included in Manufacturing License List	Responsibility	Remarks (If any)
6.	To affix country specific label requirements for Malaysia a) Name & content of preservative(s) where present b) The words "Keep medicine out of reach of children" or words bearing similar meaning in both Bahasa Malaysia & English c) The words "Controlled Medicine/ Ubat Terkawal" (For scheduled poisons only) d) Security label (Hologram)	√* √* √* √*	X X X X	Importer/ Primary Repacker/ Secondary Repacker	The importer/ repacker shall maintain the relevant documents (e.g. hologram records, stock card)
7.	To insert new Package Insert/ to change original Package Insert into the inside of the secondary packaging product (unit box)	√	√	Secondary repacker	e.g. Remove Germany package insert from the product and replace with Malaysia specific Package Insert
8.	To attach/ tape Package Insert on the outside of the secondary packaging product (unit box)	√	√	Secondary repacker	
9.	To inkjet the Product Registration Number on the primary/secondary packaging material (unit box)	√	√	Primary/ Secondary repacker	
10.	To inkjet of the Manufacturing Date, Expiry Date and Batch Number on the primary/secondary packaging material (unit box)	√	√	Primary/ Secondary repacker	

No.	Description of Repacking Activity	Require GMP/GDP Control	Product to be included in Manufacturing License List	Responsibility	Remarks (If any)
11.	To affix specific labelling requirement of a product	√	√	Primary/ Secondary repacker	Refer Appendix 9: Labelling Requirements
12.	To inkjet/ affix label 'Sample Not For Sale'/ 'Physician's sample not for sale'/ 'Professional sample not for sale'/ etc. onto the secondary packaging material	√*	X	Secondary repacker/ Importer	
13.	To affix label 'Diimport/diedarkan oleh' onto the primary/ secondary packaging material	√*	X	Primary/ Secondary repacker/ importer	
14.	To affix 'Halal' label onto the primary/ secondary packaging material	√*	X	Primary/ Secondary repacker/ importer	
15.	To shrink wrap several boxes or bottles together	√*	X	Secondary repacker/ Importer	
16.	To repack finished products into tertiary packaging materials without any changes to the product	√*	X	Secondary repacker/ Importer	
17.	To repack several registered finished products as a convenient pack for promotional sale only without changing the product immediate and unit outer carton label	√*	X	Secondary repacker/ Importer	Refer 16.5 Application for a Convenient Pack
18.	To affix security seal onto the secondary/ tertiary packaging material	√*	X	Secondary repacker/ Importer	

5. Additional notes

5.1 √* denotes that the repacking activity has to be done in a Good Distribution Practise (GDP) controlled or licensed facility.

5.2 The repacking activities as listed in Para 4 is non-exhaustive. Product and license holders shall be responsible to ensure that the registered products are repacked in an appropriate manner and all relevant documents is maintained (batch packaging records/logbooks/inventory records/ procedures).

5.3 The conditions of the product must meet the storage requirements as stated in the Good Distribution Practice Guideline by National Pharmaceutical Regulatory Division (NPRA).

5.4 In deciding whether a particular bulk product is suitable for repacking, the repacker should take into consideration any available information from the manufacturer, published literature and any reference pharmacopoeia.

6. References

6.1 Drug Registration Guidance Document; First Edition; January 2013
6.2 Good Distribution Practice Guideline, 1st Edition; 2011
6.3 Control of Cosmetic Products
6.4 USP 31; Volume 1, 2008
6.5 Guidance for Industry Container Closure Systems for Packaging Human Drugs and Biologics; May 1999
6.6 Irish Medicine Boards Guide to Parallel Imports; AUT-G0006-4.9
6.7 WHO GMP: Main Principles for Pharmaceutical Products.

Glossary for Homeopathic Products:

Active substance: Active substances are considered to be source materials processed by one or a sequence of homeopathic manufacturing procedures listed in pharmacopoeias in official use and other officially recognized documents (e.g. mother tinctures, dilutions or triturations).

Diluent: Substance used for the preparation of a stock/ starting material or the potentisation process and which may also represent the substance of the dosage form. Liquid diluents usually consist of purified water, aqueous solution, glycerol or ethanol of a suitable concentration or for which there is an appropriate monograph. The commonest solid diluent is usually lactose monohydrate.

Dilution: Dilution has two meanings in homeopathy:

- For a product, a dilution is a liquid homeopathic preparation which is potentised as described below (see the definition of potentisation). Individual dilutions are also called potencies;
- As a procedure, dilution means the de-concentration process of a liquid or a solid preparation. One part of each stage in the preparation of a homeopathic medicine from its stock or previous dilution (potency) by adding one part of a previous solid or liquid phase to a predetermined weight or volume of the diluent (see Potentisation below). Dilution occurs at all stages of production of the homeopathic medicines whether by addition of solid excipient in trituration or the addition of diluent in the liquid phase and succussion.

Dosage form: a dosage form in homeopathy complies with any relevant specifications for that dosage form for which an appropriate characterization exists in a pharmacopoeia in official use, or in other officially recognized documents. The most commonly encountered homeopathic dosage form, *the globule (pillule or pellet)*, is a solid spherule which consists of lactose, sucrose or any other suitable vehicle. Usually, preformed globules are impregnated with a dilution or directly by a mother tincture. The homeopathic dosage form *tablet* is a solid preparation which complies with any relevant characterization in the pharmacopoeia in official use (or in other officially recognized documents) for tablets. Homeopathic medicines in tablet form are either prepared by impregnation of preformed tablets or by compression of triturations with the vehicle. The most commonly used *liquid homeopathic medicines* are either alcoholic solutions or oral liquids.

Excipient: Substance needed for manufacturing a dosage form (used after potentisation) such as wheat starch and magnesium stearate for tablets. It may also represent the substance of the dosage form.

Homeopath: A qualified provider (practitioner) of homeopathic treatment.

Homeopathic medicines: Any medicine prepared in accordance with a homeopathic manufacturing procedure described by a pharmacopoeia in official use or other officially recognized documents. A homeopathic medicine may contain a number of homeopathic preparations.

Homeopathy: Classical homeopathy is a system of medicine using preparations of substances whose effects, when administered to healthy subjects, correspond to the manifestations of the disorder in the individual patients.

Mother tincture (also called tincture): The initial homeopathic preparation made from source material that can be further potentised (also called “liquid stock”), sometimes used as homeopathic medicines, is regarded as the most concentrated form of a finished homeopathic medicine. Mother tinctures are obtained classically by maceration or percolation (sometimes also by digestion, infusion, decoction or fermentation) techniques from source materials according to a procedure prescribed by a recognized homeopathic pharmacopoeia. Sometimes a mother tincture corresponds to the first decimal dilution, “1D” or “1X” (10-1), mostly when dry plant material is used as starting material.

Nosodes: Homeopathic medicines prepared from disease products from humans or animals; from pathogenic organisms or their metabolic products; or from decomposition products of animal organs.

Potency: The denominated degree of serial trituration or dilution and succession that is reached for each homeopathic medicine. The degrees of dilution or potencies are normally indicated by the letters D, DH or X for successive 1 to 10 (decimal) dilutions, the letters C, CH or K or CK for successive 1 to 100 (centesimal) dilutions while Q or LM denote successive 1 to 50 000 (Hahnemannian quinquagintamillesimal) dilutions. Dilution by 1 to 10 denotes 1 part processed with 9 parts of diluent (Hahnemannian decimal), dilution by 1 to 100, 1 part processed with 99 parts (Hahnemannian or Korsakovian centesimal), and so on. The number preceding the letters (e.g. D, C or LM) normally indicates the number of dilution steps employed (Table 1).

As a consequence of different views in various approaches in homeotherapy and because the notion of these terms may depend on the nature of the starting materials, the terms “high potency” and “low potency” cannot be defined unambiguously.

Potentisation (also called dinamization)**:** The combined process of serial dilution and succussion or trituration at each step in the manufacture of homeopathic medicines from stocks. (According to the tenet of homeopathy, potentisation represents the process by which the activity of a homeopathic medicine is developed.)

Table 1: Potency table

Dilution ratio	Common designation(s)	Examples
1:10[a]	X	1X, 2X, 3X, etc.
1:10[a]	D	D1, D2, D3, etc.
1:10[a]	DH	DH1, DH2, DH3, etc.
1:100[b]	C	1C, 2C, 3C, etc. C1, C2, C3, etc.
1:100[b]	CH	1CH, 2CH, 3CH, etc. CH1, CH2, CH3, etc.
1:100[b]	CK	1CK, 2CK, 3CK, etc. CK1, CK2, CK3, etc.
1:100[b]	K	1K, 2K, 3K, etc. K1, K2, K3, etc.
1:50 000[a]	LM	1LM, 2LM, 3LM, etc.
1:50 000[a]	Q	Q1, Q2, Q3, etc.

[a]For 1:10 and 1:50 000 dilution ratios only the Hahnemannian method of manufacture (multi-flask method) is used.

[b]For 1:100 dilution ratios a C potency is assumed to use the Hahnemannian method of manufacture (multi-flask method) and can also be denoted as CH. When the Korsakovian method of manufacture (single-flask method) is used, the potency is designated as CK or K.

Sarcodes: Homeopathic medicines made from healthy animal tissues or secretions. In Greek, sarcode means fleshly.

Source material (raw material, starting material, mother substance): Source material is the original raw material used for the production of homeopathic medicines. This material is obtained from natural sources, e.g. of botanical, zoological, microbiological, mineral, chemical, animal and human origin, or synthetic procedures. Source materials may undergo preliminary treatment in order to be further processed.

Stock: Substances or preparations made from the source materials (e.g. by maceration, succussion or trituration) used as starting points for the production of homeopathic medicines.