

Questions & Answers

- Medicinal products
- Human and veterinary
(labelling and package leaflet)

This document only covers questions for products authorised in the national, MR and DC procedures (including SRP for veterinary products). The answers given below are valid for Denmark (DK), Finland (FI), Iceland (IS), Norway (NO) and Sweden (SE) unless otherwise specified.

1. General questions concerning labelling

1.1. Is there something specific an applicant should consider before submission of an application if the applicant plans a Nordic package, i.e. a package for two or more Nordic countries.

Last update: 2022-01-28

Before submission of any application the applicant should carefully consider the labelling which is actually required according to labelling guidelines provided in the annotated QRD and QRDvet templates. It is recommended that the applicant only proposes labelling which is considered to be necessary.

Before submission the applicant should also consider all available options for the mock-up regarding harmonised translation, e.g. the use of abbreviated Latin terms for the active substance and excipients, the use of abbreviations like “i.m.”, “i.v.” and “s.c.”, etc. For human products the use of the abbreviations for batch number and expiry date should also be considered.

For writing the active substance in Latin, please see the specific question below about Latin language.

Before submission the applicant is strongly recommended to create a mock-up of the Nordic package (blister, foil, strip, label, carton) to ensure that a Nordic package will be feasible (for example in terms of available space, thus readability, on the package) based on the proposed labelling.

1.2. Is it possible to achieve a Nordic package for a product, if the marketing authorisations have already been granted via the national procedure in the relevant Nordic countries or via DCP/MRP in some of the countries? How should the marketing authorisation holder proceed in case of differences in the product information?

Last update: 2022-01-28

Yes, it is possible to achieve a Nordic package although the product has been approved via a national procedure in each country. This also applies if the product is approved by decentralised/mutual recognition procedure in some countries and by national procedure in others.

However, a common Nordic package cannot be achieved unless the following is fulfilled;

- The name and the strength of the medicinal product must be the same
- The SmPC/SPC, package leaflet and labelling (product information) must be identical
- The legal status (POM/OTC) must be the same

Furthermore, the multilingual package is only possible if the readability is not compromised by adding 2 or more languages to the labelling elements.

If your product needs to be harmonised before a common Nordic package can be achieved, then this should be done in accordance with Commission Regulation (EC) No 1234/2008 as amended (human products) or CMDv Guidance on the details of the classification of variations requiring assessment

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according to Article 62 of Regulation (EU) 2019/6 (veterinary products) concerning variations and standard fee is required. If the outcome of the variation is to achieve common Nordic packages, a work sharing variation should be considered to achieve common harmonised English SmPC/SPC, package leaflet and labelling.

Applicants are encouraged to use the Nordic mock-up cooperation by including the designated [request form](#) in their submission. Please notice that DK does not participate in this cooperation.

1.3. Could Nordic Packages be accepted for parallel imported medicinal products for human use and parallel traded veterinary medicinal products?

Last update: 2022-01-28

Nordic packages could be accepted for parallel imported medicinal products for human use and parallel traded veterinary medicinal products provided that the requirements for Nordic Packages are fulfilled. A common Nordic package cannot be achieved unless the following is fulfilled;

- The name and the strength of the medicinal product must be the same
- The SmPC/SPC, package leaflet and labelling (product information) must be identical
- The legal status (POM/OTC) must be the same
- The labelling is submitted for approval nationally in each country
- The national requirements for the labelling of parallel imported medicinal products for human use/parallel traded veterinary medicinal products should be fulfilled.

Furthermore, the parallel importer/wholesale distributor in the destination Member State should ensure that the GMP term "homogen batch" is complied with for the Nordic Package. This would e.g. mean that the same product (MA no) from the same source country/source Member State is approved in the Nordic countries. The parallel imported medicinal product for human use/parallel traded veterinary medicinal product also needs to have the same shelf life and storage conditions approved in the Nordic countries. The parallel importer/wholesale distributor in the destination Member State needs to consider carefully if the package leaflets for the parallel imported medicinal product for human use/parallel traded veterinary medicinal product are identical in the Nordic countries as this is a prerequisite for having Nordic Packages.

1.4. Should mock-ups for a Nordic package be approved in the respective Nordic medicines agencies for MR and DC procedures?

Last update: 2018-04-23

FI, NO, SE: Mock-ups should be approved by the concerned national medicines agencies.

IS: Mock-ups must be submitted. However, the Icelandic Medicines Agency does normally not assess/review the mock-ups except when participating in the [Nordic mock-up cooperation](#). It is considered to be the responsibility of the marketing authorisation holder to ensure correct labelling, legibility, appropriate layout etc.

DK: Mock-ups are not assessed or approved by DKMA. Regularly DKMA carries out random compliance checks of product labelling.

The labelling text should contain the same information in all languages.

1.5. If an applicant plans a Nordic package and it is foreseen that for example Latin terms will be used for the active substance(s) and excipients, as well as abbreviations like "EXP" and "Lot", should the labelling translation in word format correspond to the mock-ups?

Last update: 2021-02-09

IS, SE: The labelling translation in the word format should be a strict translation of the final English labelling text. Latin and exemptions are only included in the mock-ups.

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FI: The labelling translation in the word format can be a strict translation of the final English labelling text and/or it may contain Latin and exemptions as included in the mock-ups.

NO: The labelling translation in word format must contain Latin and exemptions as included in the mock-ups.

DK: DK do not assess the mock-up, therefore the text in the word format should reflect the mock-up.

1.6. Are there any national requirements for the minimum font size?

Last update: 2018-04-23

The minimum requirements given in the Readability Guideline for human medicinal products should be used for common Nordic packages (human and veterinary). The font style should also be considered.

1.7. Are there any guidelines if colour is used for a marked strength of medicinal product on the secondary- and primary packages?

Last update: 2021-02-09

If colour is used on the outer pack it is recommended that same colour is carried onto primary packaging to aid identification of the medicine. See also question number 3.6.

1.8. What are the requirements if a company wants to add a QR-code/URL?

Last update: 2022-01-28

Questions regarding QR-codes are out of scope for the Nordic package group. However, we present the following information:

For human products authorised in DCP, MRP or NP reference is made to the document “CMDh position paper on the use of Mobile scanning and other technologies to be included in labelling and PL in order to provide information about the medicinal product” published on the CMDh web site:

<https://www.hma.eu/90.html>

For veterinary products reference is made to the document “Quick Response (QR) codes in the labelling and/or package leaflet of veterinary medicinal products authorised via the centralised (CP), mutual recognition (MRP), decentralised procedures” published on the EMA website:

<https://www.ema.europa.eu/en/veterinary-regulatory/marketing-authorisation/product-information/product-information-reference-documents-guidelines>

For questions regarding CP products EMA must be contacted. See EMA web site for guidance.

1.9. Can a sticker with national labelling be used to fulfil national labelling requirements or be used to hide information?

Last update: 2021-02-09

For DK, IS, NO and SE this is a possible way to add information as an exemption, as long as readability is not compromised and the labelling is in accordance with the approved text and national requirements. This is common practice in Iceland but marketing authorisation holders are strongly encouraged to update their products to include Icelandic labelling. The sticker must be permanent and the addition of a sticker must be done by a manufacturer with a valid license.

FI: A sticker may be used to add the red warning triangle on the labelling but not for any other purposes. Stickers are not accepted to over-label or hide information on the labelling. The sticker must be permanent

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and the addition of a sticker must be done by a manufacturer with a valid license and approved in the marketing authorisation.

SE: In cases when the red warning triangle is required in DK, NO and/or FI the triangle may be hidden by a sticker on the packages intended for SE. If the sticker is added after batch release a specific permission to do this is required from the MPA.

DK: In cases when the red warning triangle is required in other Nordic countries, but not in DK, the triangle may be hidden by a sticker on the packages intended for DK. The sticker must be permanent and the addition of a sticker must be done by a manufacturer with a valid license.

Please see also Commission Q&A on safety features for additional information on the use of stickers for addition of the unique identifier.

1.10. Are the EMA QRD and QRD vet templates accepted for national products?

Last update: 2021-02-09

Yes.

1.11. Are language codes recommended to be added on the label? Which type of code is accepted in front of each language on the label, country codes (SE, FI, DK, IS and NO) or language codes (SV, FI, DK, IS and NO)?

Last update: 2021-02-09

The country codes are preferred to be used in front of each language, i.e. SE instead of SV. The Nordic Agencies agree that these codes improve the readability of the package and make it easier to locate one's own language. However, in case of space restrictions, their use may be avoided on the package.

1.12. How should "EXP" and "Lot" be placed on unit-dose blisters?

Last update: 2018-04-23

All information required for blisters must appear on each unit dose presentation. For statement of "Lot" and "EXP", the following applies:

For a unit-dose blister is it acceptable only to state "Lot" and "EXP" once at the end or at the side?

DK, IS: Yes

FI, NO, SE: If registered and approved as a unit dose blister: No, "Lot" and "EXP" should be stated on each unit of the blister.

If not registered and approved as a unit dose blister i.e. the blister is considered to be just a perforated blister: Yes, "Lot" and "EXP" do only have to be stated once on the blister.

1.13. What kind of logos are accepted on packages in the Nordic countries?

Last update: 2022-01-28

Human products

Only logo of the MAH and the local representative (if applicable) in accordance with the application form can be accepted.

The readability must not be negatively affected, nor must such a logo take up space from the required information, e.g. product logos and company logos should be avoided if they prevent multilingual packages. Logos must not be of a promotional nature.

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It is not a requirement or necessary to have company logos on the package.

Veterinary products

Inclusion of the local representative on the mock-ups would need to be requested by the marketing authorisation holder and accepted by national competent authorities according to Article 13 of Regulation (EU) 2019/6.

1.14. Must the local representative be stated on the package?

Last update: 2018-04-23

No. As space restrictions are common it is recommended not to print this information on the package, as it will be mentioned in the leaflet.

1.15. Is it acceptable to state the local distributor (wholesaler) on the package?

Last update: 2014-01-30

No.

1.16. How should the calendar days be stated on a calendar blister?

Last update: 2022-01-28

Either the name of the day or an abbreviation should be used. Please, refer to the European Medicine Agency's QRD reference documents and guidance.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Denmark	Man	Tirs	Ons	Tors	Fre	Lør	Søn
Finland	Ma	Ti	Ke	To	Pe	La	Su
Iceland	Má	Þri	Mi	Fi	Fö	Lau	Su
Norway	Ma.	Ti.	On.	To.	Fr.	Lø.	Sø.
Sweden	Mån	Tis	Ons	Tors	Fre	Lör	Sön

On a case-by-case basis, further abbreviations could be discussed and accepted by the authorities.

DK: In the national guidance "Vejledning til bekendtgørelse om mærkning m.m. af lægemidler til mennesker" a list of different abbreviations for calendar days is included.

1.17. How soon, following approval of **non-urgent** changes in the labelling and package leaflet, must the changes be implemented?

Last update: 2021-02-09

A general rule is that changes would be expected to be implemented for the next batch manufactured of the product. However, at present different time lines apply in the Nordic countries:

SE: Six months after the variation has been approved, no packaging with the previously approved labelling or package leaflet may be released onto the market, unless otherwise decided by the Medical Products Agency.

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NO, DK: The changes should be implemented within 6 months after approval. However if it is stated in the current package leaflet that the newest version is uploaded online on the Norwegian Felleskatalogen.no or the Danish Medicines Agency's web page the implementation time is 12 months.

FI, IS: The implementation should be made for the next possible batch.

On a case-by-case basis, depending on the urgency of the changes, authorities may request implementation earlier than the timelines mentioned above.

1.18. Can the Nordic agencies provide an example of a Nordic package and are there some practical advices which should be kept in mind?

Last update: 2014-01-30

See Annex I: "Dummy" mock-ups are for information purpose only.

2. Name of the product

2.1. Can the applicant ask the medicines agencies in DK, FI, IS, NO and SE to assess and approve a name of a product before submission of an application?

Last update: 2022-01-28

Human products

No.

The name of a product is assessed during a marketing authorisation application/variation procedure and any name issues should if possible be solved before end of procedure.

It is important that an applicant who is planning a Nordic package inform the Nordic agencies of this when proposing a name for a product. The Nordic agencies will then have the opportunity to communicate, if necessary, in order to approve the same name for all five Nordic countries.

It is not possible to reserve a product name. A final evaluation of the name will always be made before final approval of the MA.

Veterinary products

New applications: Same procedure as for human products, please see above.

Variation application for name change: When changing product name, the applicant must send in a proposal for the name change nationally and wait for a positive response before submitting the VNRA. Please refer to the website of the Agencies for further guidance.

SE: registrator@lakemedelsverket.se

FI: vet.applications@fimea.fi

NO: name.vet@legemiddelverket.no

DK: godkendelse@dkma.dk

IMA: ima@ima.is

2.2. For a product which is given a generic product name, can the INN be written in English?

Last update: 2014-01-30

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Yes, unless the English term is very different from the national one, for example if the name includes “potassium” or “sodium”.

2.3. For a product which is given the generic name of the active substance, which is for example a salt, should the salt be a part of the name?

Last update: 2018-04-23

SE: No, the salt should normally not be part of the name. Inclusion complicates the name, makes it longer and harder to remember for a patient.

DK, IS: If the strength is given in relation to the salt then the salt should be part of the name. However, for common Nordic packages it is possible to be more flexible and deviate from this practice, if no safety issues are related.

FI, NO: No, the salt should not be part of the name unless the salt has an impact on the effect of the medicinal product. However, as there are products on the market with salt as part of the generic name, the generic name with the salt will also continue to be required for any new medicinal products containing the same substance.

2.4. When printing the name of the active substance(s) on the package, in connection with the name of the product, should the name of the active substance(s) begin with an upper- or lower-case letter?

Last update: 2015-02-25

The name of the active substance(s) should in these cases begin with a lower-case letter, to clearly separate the name of the active substance(s) from the name of the product.

2.5. Should the name of the active substance(s) be printed below the name of the product, even if the name of the product is the INN + company name?

Last update: 2021-02-09

In cases when the strength does not correspond to the active moiety:

Yes.

In cases when the strength corresponds to the active moiety:

SE, NO: Yes. Always required for the outer package. On blisters and small immediate packages the active substance can be left out if space problems occur if the name of the product is a generic name.

DK, FI, IS: No.

2.6. Is it allowed to print the name of the product in capital letters?

Last update: 2014-01-30

It is strongly recommended that the name of a product is not printed in capital letters, except for the first letter in the name.

2.7. Is it acceptable to print the suffix in a name, in another colour than the name itself?

Last update: 2014-01-30

No, normally not acceptable.

2.8. Which qualifiers are acceptable as a part of the invented name of a product?

Last update: 2021-02-09

In the past qualifiers were sometimes considered necessary to separate strengths and/or pharmaceutical forms. Today, qualifiers should normally be avoided and are generally discouraged as the strength and

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pharmaceutical form would be clearly stated on the package. This is especially relevant for Nordic packages, however, see one exception below. Promotional qualifiers are not accepted.

Not all qualifiers are acceptable in all Nordic countries. Hence, carefully consider the need for a qualifier if the goal is to have a Nordic package.

FI, NO, SE: The qualifier "Vet" is recommended for all veterinary products.

IS: The qualifier "Vet" is accepted for all veterinary products.

DK: The qualifier "Vet" is accepted for veterinary products as part of invented names only.

3. Strength

3.1. Must the strength be stated in the same font size and font style as the name of the product?

Last update: 2014-01-30

Yes, strongly recommended whenever possible.

3.2. If the strength of a product is given in micrograms, can the abbreviations "mcg" or µg be used on small immediate packaging?

Last update: 2021-02-09

No. The appropriate abbreviated term in each language should be used, i.e.:

DK, FI, NO, SE: mikrog

IS: míkróg (exceptionally, the term "mikrog" can be used) for Nordic packages.

It should be noted that if the abbreviation is identical for two or more countries, it should not be repeated on the package.

In case of space limitations, and on a case-by-case basis, the abbreviated form listed above could be accepted for outer packaging.

3.3. Is it acceptable to state the strength of a product as "%" or "ppm"?

Last update: 2014-01-30

As a general rule "%" and "ppm", as well as other similar units shall be avoided and the strength should be stated as for example mg/ml, mg/g etc. The strength cannot be stated in two different ways on the package, i.e. both as for example mg/ml and %.

3.4. When the strength of a product is stated in International Units, i.e. "IU" is it then acceptable to use "IU" on the Nordic packages, instead of the abbreviations "IE" (DK, NO, SE), "KY" (FI) and "a.e." (IS)?

Last update: 2014-01-30

Yes. Please note that when the abbreviation "IU" is used, it should be the only abbreviation for International Units on the Nordic package, i.e. do not mix "IU" with the national abbreviations.

3.5. When the strength of a product is stated in Units, i.e. "U" is it then acceptable to use "U" on the Nordic packages? As regards International Units, please see the question about IU.

Last update: 2021-02-09

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FI, IS: Yes. "U" can be used, but if the package is shared with DK/SE/NO who do not allow the abbreviation the units must be stated in the same way for all languages i.e. full term.

SE, NO: No. "Units" should not be abbreviated.

DK: No, "Units" should not be used.

The appropriate translations should be used:

DK: enheder

FI: yksikköä

IS: einingar

NO, SE: enheter

3.6. Is it acceptable to print the strength in different colours for products available in more than one strength to avoid mix-up?

Last update: 2014-01-30

Yes, packages for different strengths should be distinguished from each other. It is strongly recommended to use different colours for different strengths.

3.7. How shall the content of the active substance be presented on the label for a parenteral pharmaceutical form?

Last update: 2021-02-09

When the strength is given as a concentration e.g. in mg/ml, it is strongly recommended to present also the total quantity per total volume on the package, e.g. x ml = y mg.

4. Pharmaceutical form

4.1. If the pharmaceutical form consists of two or more words, for example "film-coated tablet" must all the words be printed in one line?

Last update: 2018-04-23

It is strongly recommended to print the full pharmaceutical form in one line. When relevant and if possible each language should be in separate lines.

4.2. Which pharmaceutical forms can be abbreviated on the outer package, label, blister, etc.?

Last update: 2021-02-09

The full standard term must appear on the outer package at least once, and in connection with the name of the product, on the most prominent area of the package, e.g. the front panel on a carton. EDQM patient friendly short terms can be used for other locations on the carton and immediate packaging material, if necessary.

Further abbreviations are possible and can replace the patient friendly terms in cases when space is very limited. When combining the abbreviations they should be separated by a "/" and when the abbreviation is identical in two or more countries it shall only be printed once.

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Following is a list of abbreviations which are acceptable

Pharmaceutical form	DK Singular / Plural	FI Singular / Plural	IS Singular / Plural	NO Singular / Plural	SE Singular / Plural
Capsule	kaps.	kaps.	hylki / hylki	kaps.	kaps.
Chewable tablet	tyggetabl.	purutabl.	tuggut. / tuggut.	tyggetabl.	tuggtabl.
Emulsion for injection	inj.*	inj.*	stl. / stl.*	inj.væske/inj.*	inj.*
Eye drops	-	-	augndr. / augndr.	-	-
Film-coated tablet	tabl.	tabl.	tafla / töflur	tabl.	tabl.
Gastro-resistant capsule	enterokaps.	enterokaps.	magasýrup. hylki. / magasýrup. hylki	enterokaps.	enterokaps.
Gastro-resistant tablet	enterotabl.	enterotabl.	magasýrup. tafla / magasýrup. töflur	enterotabl.	enterotabl.
Orodispersible tablet	smeltetabl.	suussa hajoava tabl.	munndr.tafla / munndr.töflur	smeltetabl.	munsönderfallande tabl.
Prolonged-release capsule	depotkaps.	depotkaps.	-	depotkaps.	depotkaps.
Prolonged-release tablet	depottabl.	depottabl.	-	depottabl.	depottabl.
Solution for infusion	inf.*	-	innr.lyf / innr.lyf	inf.væske/inf.*	-
Solution for injection	inj.*	inj.*	stl. / stl.*	inj.væske/inj.*	inj.*
Sublingual tablet	resoriblet, subling.	resoriblet.	tunguróartafla/tunguróartöflur	Sublingvaltabl.	resoriblett
Suppository	supp.		endaþ.stíll / endaþ.stílar	stikkp.	supp.
Suspension for injection	inj.*	inj.*	stl. / stl.*	inj.væske/inj.*	inj.*
Tablets	tabl.	tabl.	tafla / töflur	tabl.	tabl.
Solution for injection/infusion	inj./inf. or inj.inf. væske	inj./inf. or inj./inf. neste	stl./innr.lyf	inj./inf. or inj.-/inf. væske	inj./inf. or inj.-/inf.vätiska

Regarding sublingual tablet: Additionally, the following possibility has been agreed and can be used as an extra option for a common label of a blister in the mentioned countries:

DK/FI/SE: “resoribletit/resoribletter”

* The abbreviation can be used if you have no other pharmaceutical forms that can be mixed-up with the form (e.g. emulsion for injection, suspension for injection).

4.3. For capsules and tablets, is it acceptable if the pharmaceutical form is depicted on the outer package?

Last update: 2018-04-23

Yes, if the pictogram is in life size and reflects the shape and score line, if any.

5. The active substance and excipients

5.1. Can the active substance(s) and excipients be written in Latin on a Nordic package?

Last update: 2021-02-09

Yes.

Reference is also made to the [“Compilation of QRD decisions on stylistic matters in product information”](#) with regard to information in the product information annexes.

5.2. Is it acceptable to use an abbreviation of the Latin term for the active substance(s) and excipients on a Nordic package and if so, how should these abbreviations be?

Last update: 2015-02-25

These abbreviations are accepted and encouraged to facilitate the Nordic package. When relevant the labelling sections for active substance(s) and excipient(s) can be combined on the package, using abbreviations of the Latin terms, e.g.:

“1 ml: metoprolol. tartr. resp. metoprolol. 1 mg, natr. chlorid., aq. ad iniectionem.”

“1 ml: butorphanol. tartr. resp. butorphanol. 15 mg, chlorocresol., natr. chlorid., aq. ad iniectionem.”

Guidelines on abbreviations of the Latin name for active substances and excipients.

1) If the Latin name ends with -um, -us, -ium, -eum, these endings should be replaced with a full stop.

Example:

coffeinum → coffein.

2) If the Latin name ends with -icum (-ici), -oicum (-oici), -uicum (-uici), these endings should be replaced with a full stop.

Example:

aceticum → acet.

3) The endings -as, -oas, -ias, -eas should be replaced with a full stop.

Example:

citras → citr.

4) The endings -i and -ii should be replaced with a full stop.

Example:

calcii → calc.

5) Nominative and genitive cases have the same abbreviation.

Example:

natrium → natr.

natrii → natr.

Exemptions:

aluminium → alum.

aqua → aq.

argentum → arg.

bismuthum → bism.

carbonas → carb.

hydrargyrum → hydrarg.

magnesium → magn.

salicylas → salic.

Other abbreviations - excipients:

water for injections → aq. ad iniectionem.

purified water → aq. purif.

5.3. Is there a way to shorten the translation of “Each tablet contains xx mg <active substance>”, “Each capsule contains xx mg <active substance>”?

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Last update: 2014-01-30

Yes. In many cases it would be possible to abbreviate this sentence. For example “1 tabl./tafla: xx mg <active substance (in Latin)>”, “1 kaps./hylki: xx mg <active substance (in Latin)>”, “1 ml: xx mg <active substance (in Latin)>”. This abbreviated text covers all five Nordic countries.

It should be noted that if excipients are to be stated on the package, they could follow the active substance, e.g. “1 kaps./hylki: xx mg <active substance (in Latin)>, lactos.”.

6. Pharmaceutical form and contents

6.1. Must the number of e.g. tablets and capsules be stated in the same row as the pharmaceutical form?

Last update: 2014-01-30

No.

7. Routes of administration

7.1. Can the parenteral routes of administration be abbreviated?

Last update: 2015-02-25

The following abbreviations are accepted by all Nordic authorities for small immediate packaging:

For intramuscular use: i.m.

For intravenous use: i.v.

For subcutaneous use: s.c.

Other routes must be stated in their full form.

DK, IS, SE: The above mentioned abbreviations are also accepted for the outer packaging.

7.2. Is it acceptable not to print the sentence “For oral use” on the package for all formulations of tablets and capsules which are to be swallowed?

Last update: 2022-01-28

Human products

Yes. It is acceptable to leave out “For oral use” on the package. Please note that in these cases the text must be left out on the package for all countries which share the package.

Veterinary products

The route of administration should be stated, also “for oral use”.

7.3. Is it acceptable not to print the sentence “For ocular use” on the package for pharmaceutical forms which are clearly stated as eye drops or eye ointment?

Last update: 2014-01-30

In case of space restrictions for such products, which are often small packages, a case-by-case decision to leave out the route of administration can be considered for a Nordic package.

8. Special warnings

8.1. Should cytostatic products be labelled “Cytostaticum” on the outer package, or immediate package, if there is no outer package?

Last update: 2022-01-28

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Human products

Yes, this is a requirement for cytotoxic/cytostatic medicinal products.

Veterinary products

Warnings, for example “Cytostaticum”, may be featured on the package upon request according to Article 13 of Regulation (EU) 2019/6. However, warnings must be included in the package leaflet.

9. Expiry date

9.1. Is it acceptable to use the abbreviation “EXP” on the outer/immediate packaging material?

Last update: 2022-01-28

Human products

Yes.

Veterinary products

The abbreviation “EXP” is mandatory.

9.2. Is it enough only to print the actual expiry date and leave out the abbreviation “EXP”?

Last update: 2022-01-28

Human products

Yes, for small immediate packaging and blisters.

Veterinary products

No, “EXP” must be printed.

9.3. Which format is preferred for the date (EXP) on printed mock-ups for a common Nordic package?

Last update: 2022-01-28

Human products

The most preferred for a common Nordic package is to follow annotated QRD templates.

In general, the most recommendable format is e.g.: 10-2020 (as the month given as 2 digits and the year as 4 digits). However, different formats are accepted (e.g. October 2020, Oct 2020, 10-2020) by the majority of the Nordic countries.

Veterinary products

The format should be mm/yyyy (the month given as 2 digits and the year as 4 digits).

On a case-by-case basis, the expiry date may specify the day i.e. dd/mm/yyyy.

10. Storage conditions

10.1. Must storage conditions always be printed on the package, for example “Do not store above 25°C” and “Do not store above 30°C”?

Last update: 2018-04-23

Yes. The only exemption is “No special storage conditions”, in which case nothing regarding storage conditions should be printed on the package.

DK, IS: For purely nationally authorised products “Do not store above 30 °C” can be left out on the package.

11. Name and address of the marketing authorisation holder

11.1. As regards the address of the marketing authorisation holder which is to be printed on the outer/immediate package must the country be mentioned and does it have to appear in each language covered by the package?

Last update: 2022-01-28

Human products

Yes, the country must be mentioned in the different languages.

Veterinary products

Only the name/logo name of the marketing authorisation holder is required and not the address.

11.2. Is it acceptable to print the marketing authorisation holder's phone number and e-mail address on the package?

Last update: 2022-01-28

Human products

Yes. The contact information to the marketing authorisation holder is however mentioned in the package leaflet. If there are space restrictions due to the extent of the labelling text/size of the package it is not recommended to print such information on the package.

Veterinary products

Only if it has been requested by the marketing authorisation holder and accepted by national competent authorities according to Article 13 of Regulation (EU) 2019/6.

11.3. Is it possible to have common Nordic packages for products with different marketing authorisation holders (which are legally independent companies with the same owner)?

Last update: 2015-02-25

If the names for the marketing authorisation holder are clearly different it is not possible to have a common package. However, if the names of the marketing authorisation holder are very similar, e.g "XXXXXXX AS", "XXXXXXX OY", "XXXXXXX AB" a common package could be possible.

12. Marketing authorisation number

12.1. What is the format of the marketing authorisation numbers in the Nordic countries?

Last update: 2021-02-09

The format is as follows:

	Marketing Authorisations*)	Parallel Import	Traditional Herbal Medicinal Products
DK	MTnr xxxxx (DK)	MTnr xxxxx (DK)	Herbal Medicinal products: Reg nr xx-xxxxx (DK)

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			Traditional Herbal Medicinal Products MTnr xxxxx (DK)
FI	MTnr xxxxx (FI)	MTnr xxxxx (FI)	MTnr R xxxxx (FI)
IS	MTnr xxxxxx (IS) or IS/x/xx/xxx/xx	IS/x/xx/xxx/xx/SA	IS/x/xx/xxx/xx/SKR
NO	MTnr xx-xxxxx (NO)	MT(PI)nr xx-xxxxx (NO)	Reg nr xx-xxxxx (NO)
SE	MTnr xxxxx (SE)	MTnr xxxxx (SE)	MTnr xxxxx (SE)

*) The country abbreviation, „(XX)“ should be used on packages which are shared with two or more countries but it is not required for single country packages.

When printing the marketing authorisation numbers on the package they can be arranged in such a way that “MTnr” only needs to be printed once. For example the numbers can be printed in a line or in a column. Examples:

a)

MTnr xxxxx (DK), xxxxx (FI), xx-xxxxx (NO), xxxxx (SE), IS/x/xx/xxx/xx

b)

MTnr xxxxx (DK)
xxxxx (FI)
xx-xxxxx (NO)
xxxxx (SE)
IS/x/xx/xxx/xx

13. Batch number

13.1. Is it acceptable to use the abbreviation “Lot” for the batch number on the outer and immediate packaging material?

Last update: 2022-01-28

Human products

Yes.

Veterinary products

The abbreviation “Lot” is mandatory.

13.2. Must the abbreviation “Lot” be printed on blisters or is it enough to only print the actual batch number?

Last update: 2022-01-28

Human products

It is preferred to print “Lot” in logical connection to the actual batch number, but if that is not possible, it is acceptable to print only the actual batch number, i.e. without the abbreviation “Lot.”

Veterinary products

“Lot” must be printed.

14. Vnr (Nordic Article Number)

14.1. Where can information regarding Vnrs be found?

Last update: 2021-02-09

See the dummy mock-ups in Annex 1 for suggested placing of the Vnr on the package.

Other questions regarding Nordic Article Numbers are out of scope for the Nordic Package Group. Information and guidelines regarding Vnrs can be found via <http://wiki.vnr.fi/>

15. General classification of supply

15.1. Is it acceptable not to print on the package the text “Medicinal product subject to medical prescription” and “Medicinal product not subject to medical prescription” (in national languages)?

Last update: 2022-01-28

Human products

Yes, for human products it is acceptable to leave out the text “Medicinal product subject to medical prescription. None of the Nordic countries require this information. The sentence can be left out on the mock-up even if it is stated in the word format approved labelling text.

SE, FI: The packages with OTC status for medicinal products for human use are required to have the text “Medicinal product not subject to medical prescription” (in national languages).

Veterinary products

N/A

15.2. Can a potential applicant ask the medicines agencies in DK, FI, IS, NO and SE to confirm, before submission of an application, if a product will be granted an OTC status?

Last update: 2014-01-30

No. A possible OTC status will be assessed during the marketing authorisation application procedure or during the national phase.

16. Information in Braille

16.1. Is it necessary to state the pharmaceutical form in Braille?

Last update: 2022-01-28

Human products

No, this is not a requirement. In certain cases when a product is available in different similar pharmaceutical forms it is however recommended.

EDQM patient friendly terms could be used if they are also used as printed text on the labelling.

Veterinary products

N/A

17. General questions concerning the package leaflet

17.1. Is it possible to have a combined multilingual leaflet if the strengths differ?

Last update: 2018-04-23

DK: It is not acceptable to have a combined PL if the strengths differ. The information in the different PL's should be "identical".

FI, NO, SE: A combined PL with more strengths mentioned in the PL than in the PL for the other language could be accepted on a case-by-case basis if this would be the only way for the other country to get the product on the market.

IS: Can accept a combined PL even if the strengths differ, no matter how they differ.

17.2. Is it possible to have a combined multilingual leaflet if the package sizes or packages types differ?

Last update: 2018-04-23

Yes. The registered packages types and sizes can be listed for each country in the section 6 of the package leaflet. The storage conditions in section 5 should be the same for the different package types and sizes.

For example:

In Finland:

A LDPE bottle in a carton box 10 x 100 ml, 10 x 250 ml, 10 x 500 ml

A Ecobag plastic bag with a plastic overwrap in a carton box 20 x 50 ml, 20 x 100 ml

In Sweden:

A LDPE bottle in a carton box 10 x 100 ml, 20 x 100 ml, 10 x 250 ml, 10 x 500 ml, 10 x 1000 ml

The situation is relevant for national products when the leaflets are harmonised in everything else except the pack sizes and types.

17.3. Can the symbol for a trademark (™ and ®) be used in the printed version of package leaflets?

Last update: 2015-02-25

These symbols can be used at the top of the PIL, i.e. where the product name is mentioned the first time in the package leaflet for medicinal products for human and veterinary use.

17.4. Is it necessary to print the list of names of the product in each member state which participates in a DCP or MRP in the package leaflet?

Last update: 2022-01-28

Human products

FI, NO, SE: No, this list does not have to be included.

DK, IS: No, this list of medicinal product names authorised in other EEA countries does not have to be included if required for reasons of space.

However, if the list is part of the nationally approved package leaflet text it has to be included in the printed version too. Please see an example below.

For a Nordic multilingual package when the list of names is included:

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In the printed version the list only needs to be printed once, e.g. after the last language in the printed package leaflet. The heading of this section shall however be stated in all relevant languages. The names of the countries can be stated by using the ISO abbreviations for the countries, i.e. the names of the countries must not be stated in the different languages. Note that if the name of the product is the same in two or more countries, this can be stated in one line. Example for a 5 language package leaflet:

“Dette legemidlet er godkjent i EØS-landene med følgende navn:/ Tällä lääkevalmisteella on myyntilupa/rekisteröinti Euroopan talousalueeseen kuuluvissa jäsenvaltioissa seuraavilla kauppanimillä:/ Dette lægemiddel er godkendt i EEAs medlemslande under følgende navne:/ Detta läkemedel är godkänt inom Europeiska ekonomiska samarbetsområdet under namnen: / Þetta lyf hefur markaðsleyfi í löndum Evrópska efnahagssvæðisins undir eftirfarandi heitum:

AT, CZ, DE, DK, EL, FI, IS, NO, PL, SE, SL: <Product name A>.

BE: <Product name B>.

FR: <Product name C>.

IE, UK: <Product name D>.

IT, PT: <Product name E>.”

Veterinary products

N/A

17.5. Is it necessary to print the name and address of the manufacturer responsible for batch release in the package leaflet?

Last update: 2022-01-28

Yes, but if the marketing authorisation holder and the manufacturer are the same, i.e. the same company and address, the general heading “Marketing Authorisation Holder and Manufacturer” for human products and “Marketing Authorisation Holder and Manufacturer responsible for batch release” for veterinary products, can be used and this information can be stated only once.

17.6. In cases where more than one manufacturer responsible for batch release is approved, should all be listed in the word version of the package leaflet?

Last update: 2022-01-28

In cases where more than one manufacturer responsible for batch release is approved, all should be listed in the word version of the package leaflet.

The printed version of the package leaflet must clearly identify the manufacturer responsible for the release of the concerned batch or mention only the specific manufacturer responsible for the release of that batch.

Annex I

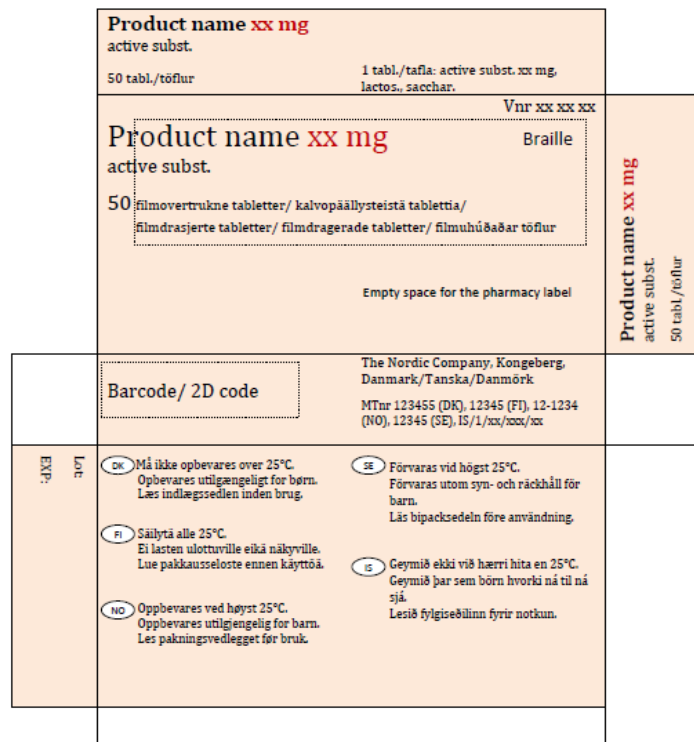
Last update: 2021-02-09

The dummy mock-ups in the Q&A document are only examples of Nordic packages and don't explain details about font sizes etc.

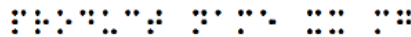
Carton

Guideline on Nordic packages

The below drawing of a five language carton is an example of how a five language carton could be prepared. There should be a clear demarcation between the different languages used; the information provided in each language should be assembled. Avoid excessive use of “/”.

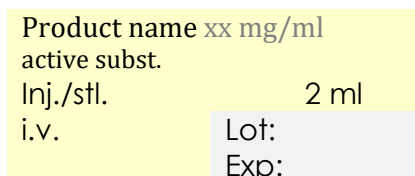


Dim: 117*61*20 mm



Braille: Product name xx mg

Small label (e.g. vial, ampoule)

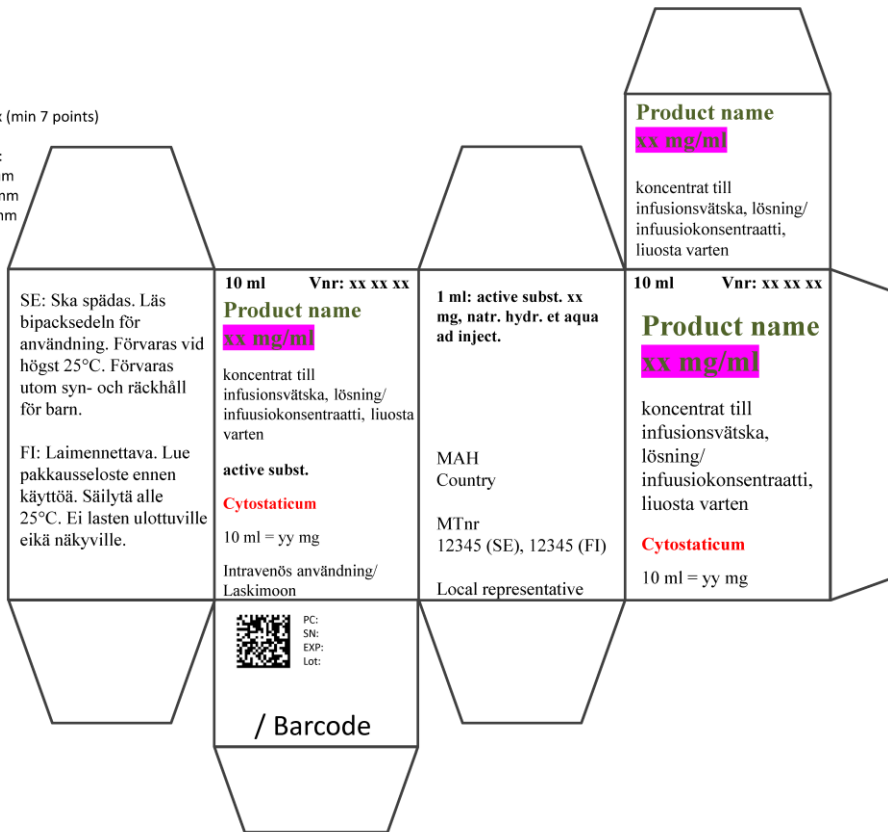


Carton for a SE/FI package (the format also applicable for DK/IS/NO), concentrate for solution for injection. N.B. Country for MAH, unique identification code (serialisation), local representative and warnings; see information in question list above.

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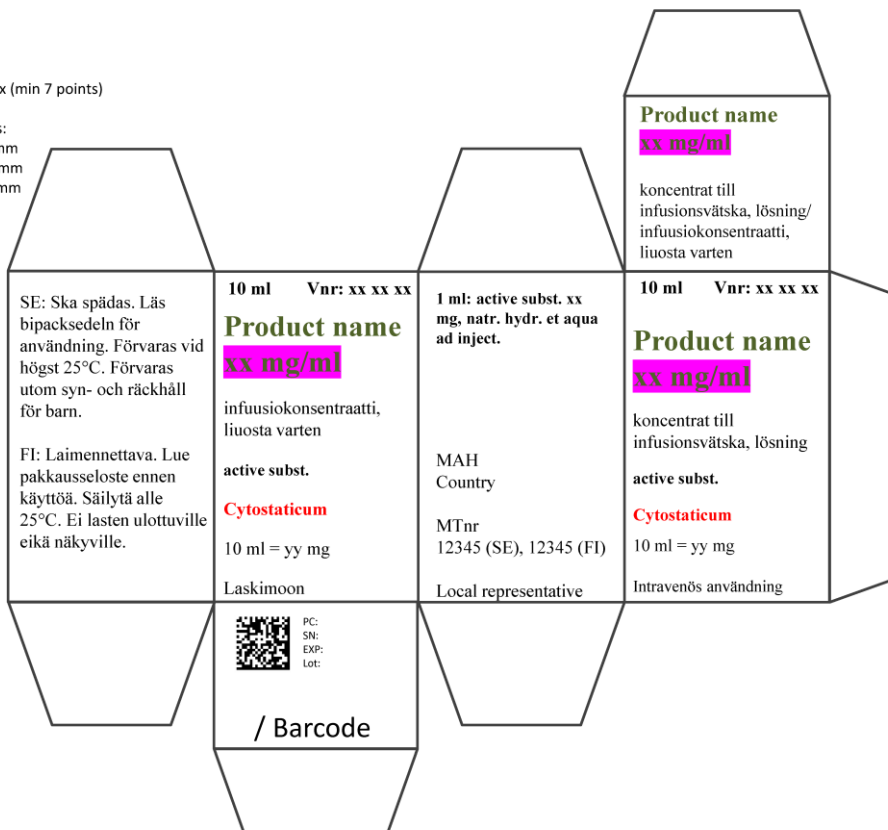
Font size: xx (min 7 points)

Dimensions:
Width: xx mm
Length: xx mm
Height: xx mm



Font size: xx (min 7 points)

Dimensions:
Width: xx mm
Length: xx mm
Height: xx mm



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Label (bottle)

N.B. Country for MAH, unique identification code (serialisation), local representative and warnings; see information in question list above.

10 ml	Vnr: xx xx xx
Product name xx mg/ml	
koncentrat till infusionsvätska, lösning/ infuusiokonsentraatti, liuosta varten	
active subst.	i.v.
Cytostaticum	10 ml = yy mg
	EXP:
	Lot: