Ensuring Authenticity for Certificates of Analysis (COAs)



FDA Public Meeting: Implementation of Drug Supply Chain Provisions of Title VII of FDASIA

July 12th 2013
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Six Degrees Counterfeit Prevention, LLC

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Purpose and Scope



Purpose

✓ The purpose of the July 12th meeting is to provide an overview of Title VII, discuss how FDA plans to implement it and hear public comment about those provisions that specifically address imported drugs and importers. Under Title VII FDA is authorized to require that importers submit information demonstrating that their drug complies with applicable requirements of the Federal Food, Drug and Cosmetic Act before their products can enter the United States. In addition, commercial importers must register with FDA and meet good importer practices. These authorities apply to both human and animal drugs.

Scope

✓ 8. Should FDA require that importers submit certificates of analysis (COAs) to the Agency as a condition of admission under section 801(r) of the FD&C Act? If so, how could an importer demonstrate a COA's authenticity?

- ✓ Protecting the Patient
 - The problem can go back to the API
- ✓ What Six Degrees Counterfeit Prevention can offer
- ✓ COA Content, Encryption, Decryption, and Authentication
- Demonstration
- Challenges
 - Is the data secure?
- ✓ Benefits

Protecting the Patient



Scope of Drug Counterfeiting

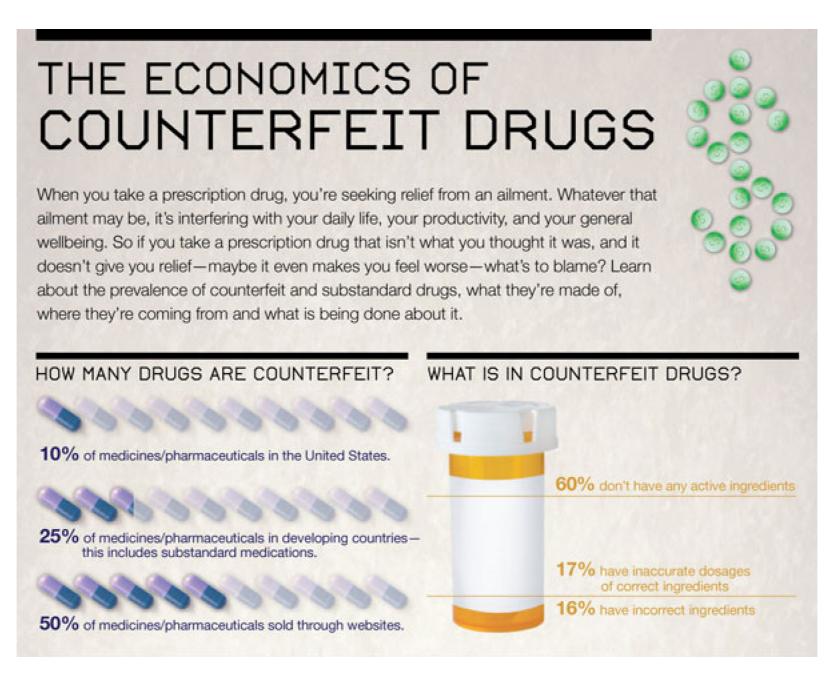
- ✓ The World Health Organization (WHO) estimates that counterfeit drug
 prevalence rates fall between 10% and 30% in the developing world, as
 compared to 1% or less in developed countries.
- ✓ The global anti-counterfeit packaging market is expected to be worth
 \$79.3 billion by 2014, growing at an estimated CAGR of 8.6% from 2009
 to 2014. This opens up a significant market potential for track-and-trace
 management (barcoding) product authentication solutions for the
 pharmaceuticals industry.

Source: <u>The Financial Express</u>, <u>Feb 11</u>, <u>2013</u>

Protecting the Patient



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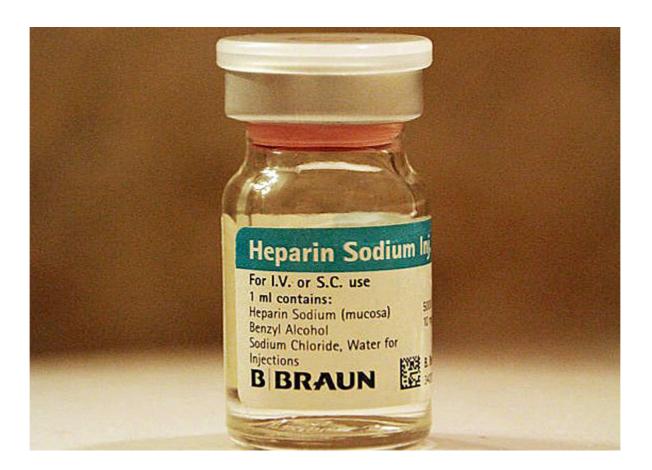


Source: <u>Carrington</u>
<u>College and the World</u>
<u>Health Organization</u>
(WHO) - 2011

The Problem Can Go Back to the API



In 2008, more than 80 people in the U.S. allegedly died from dosages of blood thinner Heparin. It turned out counterfeit ingredients traced back to China made their way into supplies in 10 countries, including the UK, Australia, Canada, and France.



Source: Business Insider - Dangers of Counterfeit Drugs - 2012

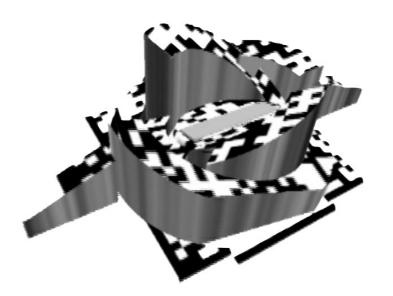
What 6DCP Can Offer



Six Degrees Counterfeit Prevention, LLC is a leading provider of the world's first non-mathematical encryption method.

The encryption was developed in Israel over a span of 10 years in order to make it the most powerful counterfeit protection, grey market detection, track and trace and marketing acceleration solution on the market today.

A Sophisticated & Powerful Encrypted Barcode



The Only Non-Mathematical Encryption in the World

- ✓ Each batch of product will be required to conform to laboratory test specifications.
- ✓ No two batch test results are the same.
- ✓ The typical Certificate of Analysis consists of three main sections.
- ✓ Header:
 - Company Logo
 - Company Name
 - Address
 - Item Number
 - Item Description
 - Batch
 - Date of Manufacture
 - Expiration Date
 - Destination Market
 - COA Version Number
- ✓ Body:
 - Master Data: Test, Specifications, Test Method
 - Variable Data: Results, Status
- ✓ Review and Approvals:
 - Compiled by
 - QC review by
 - QA approval by

Header

| Test | Specification | Results | Status |
|-------------------|---------------|---------|----------|
| Loss on Drying | 1-3 % | 2.4% | Conforms |
| Assay | 95 – 98% | 96.8% | Conforms |

Review & Approval

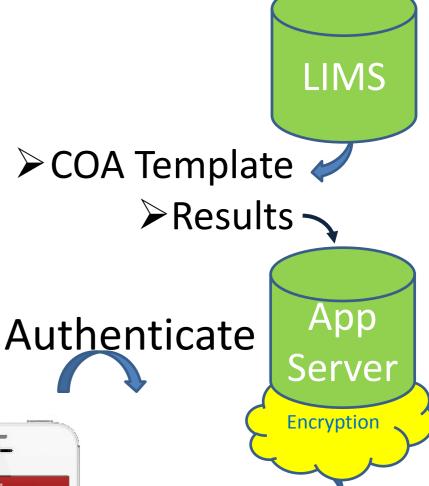
1-x pages

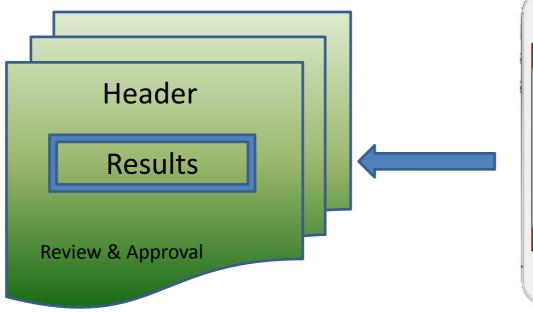
COA Encryption, Decryption, & Authentication

DEGREES
BRAND PROTECTION

✓ Avoid data compromise by encrypting and encapsulating all relevant data into the 2D BC.

- Can be read by any device with a camera, i.e smartphone, commercialized readers, webcams, etc.
- Can allow or restrict different levels of access to the encrypted content.
- ✓ The URL string and/or 2D BC can be added to Commercialization documents to accompany shipment of the product.
- ✓ The Receiving Site can scan the BC, decrypt the 2D BC, authenticate the information back with the shipping site and receive the batch in inventory.
- ✓ Certified readers will be programmed with a special application that will, like a white blood cell, devour and destroy any malicious codes (i.e. fake BC with a link to a Trojan Horse, etc.)









Demo



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Document security demo:

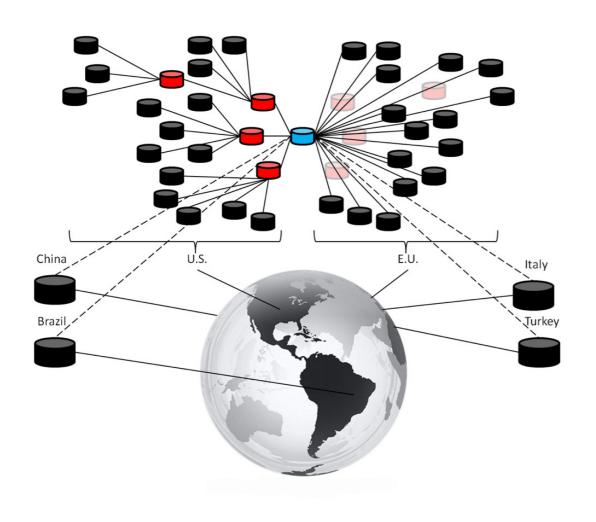
| State Bank of India Guarantee Register Authentication | | |
|---|----------------------------|--|
| Guarantee Number: | (6) | |
| Date of Issue: | - (DD-MM-YY) | |
| Applicant Name: | (18 1 | |
| Applicant Account Number: Beneficiary Name: | (18) | |
| Guarantee Amount: | (8) | |
| Type of Guarantee: | 1 Performance Guarante | |
| Expiration Date: | - (DD-MM-YY) | |
| Last Claim Date: | - (DD-MM-YY) | |
| Confirmation Email: | (EM. | |
| | Generate Guarantee Stamp 2 | |
| | | |
| | | |
| | | |

State Bank of India Guarantee Register Authentication Guarantee Number: 606060 - 13 - 07 Date of Issue: **Applicant Name:** Laboratory ABC Applicant Account Number: 712980 **Beneficiary Name:** USFoodandDrugAdmin **Guarantee Amount:** 990999 **Performance Guarante** Type of Guarantee: **Expiration Date:** - 07 - 14 Last Claim Date: - 07 - 14

HTTP://RS.2CQ.CO/?A76597913695564B841368CF8253A0C3 15ECB09C598C1640D34E1C3D6008ECA8B87BF330076CA3E4 CDE202B7A5B90316DDC851CC8010E2D2DCA26FDE5A5A163 DEDDAA46297DADBCE111D001A8A4D

Track & Trace





- ✓ Track & Trace each product independently from manufacturing to the end user in real time
- ✓ Each scanning event captures three aspects to "geo-locate" the scan:
 - IP address
 - Nearest cell tower
 - GPS coordinates
- ✓ Supply chain data is stored in a log file to be used for analyzing logistics, White Listing, locations, etc.
- ✓ In regions where there is no or limited access to the internet, use **SMS network**

Challenges



Even digital signatures have recently been compromised:

UNCOVERING ANDROID MASTER KEY THAT MAKES 99% OF DEVICES VULNERABLE

"[...] discovered a vulnerability in Android's security model that allows a hacker to modify APK code without breaking an application's cryptographic signature, to turn any legitimate application into a malicious Trojan, completely unnoticed by the app store, the phone, or the end user. The implications are huge!"

Written By Jeff Forristal, Bluebox CTO

In our opinion, it is a devastating hit to an E-SIGN document!

With 6DCP/Cryptocodex, we do not sign a document but capture the entire content and safeguard it.

Is the Data Secure? Cyber-attacks will be a Risk



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✓ Cybercrime in the pharmaceutical industry: a booming business

• Being prepared - locking the door before the horse has bolted..."The first step is knowing where your data is. Often companies secure their structured data sources - databases etc, but the challenge is that data is often scattered across unstructured sources 'in the wild' of an organization.

✓ RSA: Cyber-attack could put customers at risk

 Information about RSA's SecurID authentication tokens used by millions of people, including government and bank employees, was stolen during an "extremely sophisticated cyberattack," putting customers relying on them to secure their networks at risk, the company said today.

✓ Why Digital Signatures Are Not Signatures

"The problem is that while a digital signature authenticates the document up to the point of the signing computer, it doesn't authenticate the link between that computer and Alice. This is a subtle point. For years, I would explain the mathematics of digital signatures with sentences like: "The signer computes a digital signature of message m by computing m^e mod n." This is complete nonsense. I have digitally signed thousands of electronic documents, and I have never computed m^e mod n in my entire life. My computer makes that calculation. I am not signing anything; my computer is."

Challenges (cont'd)



- ✓ Not all COA's are digitally signed and validated. Some are manually signed, scanned and/or faxed
 - We have the capability to provision readers from authorized personnel responsible for signing these documents with an "approval" or "denial" function. So when they scan the code, they not only verify that the content is original, they can "approve" or "deny" as well. The scanning event is logged in the system that the authorized user approved the certificate. It will also record the date, time, and reader/scanner ID.
- ✓ One central system vs. distributed systems
- ✓ Enforcement of one process, one technology, one standard

Benefits



- ✓ Security of the COA results
- ✓ Cyber-security expertise
- ✓ Authentication by the issuer of the COA
- ✓ Military Grade encryption
- ✓ Inter-operability No special equipment
- ✓ Relevant information about the reading device can be captured with each scanning event and stored in a log file.
- Can be integrated with LIMS, ERP,
 Serialization (SNI), or other transactional systems

- Can be the foundation for Track & Trace for raw materials, API, excipients, drug products, and finished goods
- ✓ Data compression ensuring fast data retrieval, Decryption, and authentication.
- ✓ Cost effective solution
- ✓ GS1 compliant, if necessary
- ✓ We will customize a fully secure, cloud based system to meet the regulatory requirements of the FDA.

Thank You



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Website: http://www.6dcp.com/

Presentation: http://www.6dcp.com/FDA



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Backup Slides



Backup Slides

Examples of 2D BC's from the Demo



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Examples of URL's from the Demo



FDA (Use FDA logo)

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HTTP://RS.2CQ.CO/?A76597913695564B841368CF8253A0C315ECB09C598C1640D34E1C3D6008ECA8B87BF330076CA3E4CDE202B7A5B90316DDC851CC8010E2D 2DCA26FDE5A5A163DEDDAA46297DADBCE111D001A8A4D

HTTP://RS.2CQ.CO/?C7C512BE626ADC188005A7C83BFF0F75FEE7D37B673E54104C9195A74614A1909A0662317228BCF86291DBD6DE47350E80C8B5DFAC05516
0EB4B29CA835E33C80DE8BECBB0E2BD19039C0001AB1B

HTTP://RS.2CQ.CO/?03F08BFF340ACD6D1BEDFC6B73998F93BCDE4C274AEDAD5B0875247A0C3D16C70473354A39A28FC50B19F9B032AB3B097E885BC7CFAFDC 1357793A7A501C41FB2DEFC090E0F667B00C02000C5B6A

HTTP://RS.2CQ.CO/?A39363275153C96D8BD2B53A73C0FB8AACD62D9B96CB27CC3C27FC4172C36EE12B8A78773E156D7AA76E4C4E04B405CAA402674F03E16FF ED9E197A178B48D79807E4B18730347221BCB004D3281

HTTP://RS.2CQ.CO/?054F2B2665933E1108571B757190C1D7DE9B73233BEDE74F70A13A36920481E3F5513328795CFB0FACF3EE8A9D747BBB0EA57878E81E2836858D2D067DFDE2AEB4B9701BE8D67EC71213004F7F4D

HTTP://RS.2CQ.CO/?078E7B11025564133A4B828F2A689E9B4FB21FD5EA161F44ED72D0632EF11BA54DED251E42B148C926535C1F5D5BC0EFBF9CD8D90814DCE 6641E64E422B3D58AA1AC10491C7BBC6C1CAF00101689

HTTP://RS.2CQ.CO/?6E4DF5132AFA176BA2711C3B65C4545332343A4621532DC8AD7FBD56A5942B92BBA2075532CB8EE8B007921FA262381051B6F1ECA2D0463 011DE9A54C77D62E8439F3AAA4336ACA3122800567C38

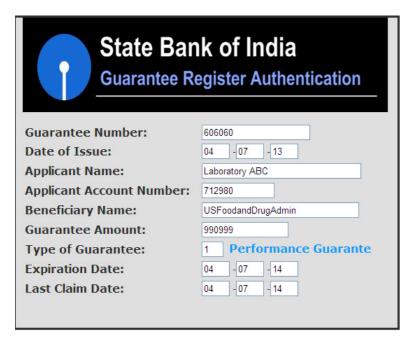
HTTP://RS.2CQ.CO/?AFF30505BCDDC0DAE733A8F7A355553C0434A3A846C793B98D7AE2825CE178FC0CD930CE1C1486A663DD24CB392D693599AD7E1FAD1DF4
75209F01F81690DF50E443A65500E923DC047D0015A330

HTTP://RS.2CQ.CO/?6FE258AB6C81C95722127A141662E961082EF54FC270203122E49761C8A73DABFB8B10D158F57BCD3DC806AF7FC745B0563E5DA0D02B385 4F0837CEBE3FCE2CB82363136E40051F4114700420325

Examples of Decrypted 2D BC's

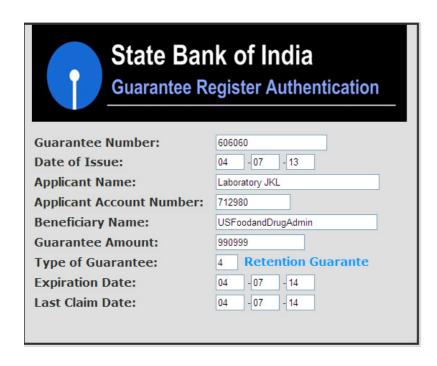


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| State Bank of India Guarantee Register Authentication | | |
|---|--------------------|--|
| Guarantee Number: | 606060 | |
| Date of Issue: | 04 - 07 - 13 | |
| Applicant Name: | Laboratory DEF | |
| Applicant Account Number: | r: 712980 | |
| Beneficiary Name: | USFoodandDrugAdmin | |
| Guarantee Amount: 990999 | | |
| Type of Guarantee: | 2 Tender Guarante | |
| Expiration Date: | 04 - 07 - 14 | |
| Last Claim Date: | 04 - 07 - 14 | |
| | 04 -07 -14 | |

| State Bank of India Guarantee Register Authentication | |
|---|---|
| Guarantee Number: Date of Issue: Applicant Name: Applicant Account Number: Beneficiary Name: Guarantee Amount: Type of Guarantee: Expiration Date: Last Claim Date: | 606060 04 -07 -13 Laboratory GHI 712980 USFoodandDrugAdmin 990999 3 Advance Payment Guarante 04 -07 -14 04 -07 -14 |





| State Bank of India Guarantee Register Authentication | | |
|---|---------------------|--|
| Guarantee Number: | 606060 | |
| Date of Issue: | 04 -07 -13 | |
| Applicant Name: | Laboratory MNO | |
| Applicant Account Number: | 712980 | |
| Beneficiary Name: | USFoodandDrugAdmin | |
| Guarantee Amount: | 990999 | |
| Type of Guarantee: | 6 Facility Guarante | |
| Expiration Date: | 04 -07 -14 | |
| Last Claim Date: | 04 -07 -14 | |
| | | |

Examples of Decrypted 2D BC's (cont'd)



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| State Bank of India Guarantee Register Authentication | | |
|---|------------------------|--|
| Guarantee Number: | 606060 | |
| Date of Issue: | 04 -07 -13 | |
| Applicant Name: | Laboratory PQR | |
| Applicant Account Number: | 712980 | |
| Beneficiary Name: | USFoodandDrugAdmin | |
| Guarantee Amount: | 990999 | |
| Type of Guarantee: | 7 Maintenance Guarante | |
| Expiration Date: | 04 -07 -14 | |
| Last Claim Date: | 04 -07 -14 | |
| | | |

| State Bank of India Guarantee Register Authentication | | |
|---|---------------------|--|
| Guarantee Number: | 606060 | |
| Date of Issue: | 04 -07 -13 | |
| Applicant Name: | Laboratory STU | |
| Applicant Account Number: | 712980 | |
| Beneficiary Name: | USFoodandDrugAdmin | |
| Guarantee Amount: | 990999 | |
| Type of Guarantee: | 8 Customes Guarante | |
| Expiration Date: | 04 -07 -14 | |
| Last Claim Date: | 04 - 07 - 14 | |
| | 04 -07 -14 | |

| State Bank of India Guarantee Register Authentication | | |
|---|---------------------|--|
| Guarantee Number: | 606060 | |
| Date of Issue: | 04 - 07 - 13 | |
| Applicant Name: | Laboratory XYZ | |
| Applicant Account Number: | 712980 | |
| Beneficiary Name: | USFoodandDrugAdmin | |
| Guarantee Amount: | 990999 | |
| Type of Guarantee: | 9 Shipping Guarante | |
| Expiration Date: | 04 - 07 - 14 | |
| Last Claim Date: | 04 - 07 - 14 | |
| | | |