2016 RxTrace U.S. Pharma Traceability Survey

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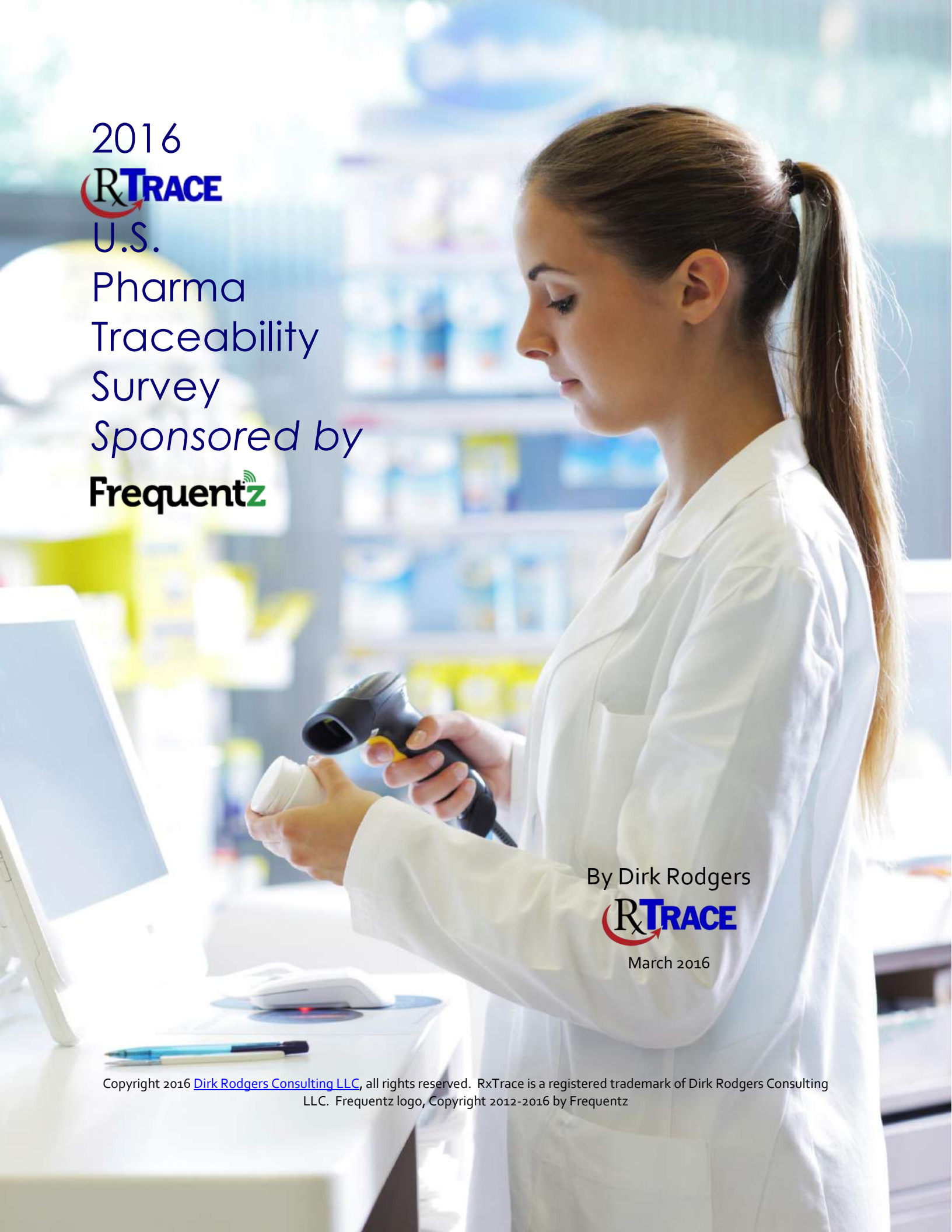

By Dirk Rodgers

RxTrace

March 2016

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About the Author

Dirk Rodgers is a regulatory strategist, author of the book "The Drug Supply Chain Security Act Explained", and founder of RxTrace.com where he writes regularly in an exploration of the intersection between the pharmaceutical supply chain, track and trace technology, standards and regulatory compliance. He has written more than 360 essays on these specific topics. A logical thinker, Dirk is skilled at making complex technical topics understandable to non-technical readers and listeners.

An electrical and computer engineer by education, Dirk has worked as a consultant, software architect, automation engineer and software developer during a career spanning thirty years. In 2002, he joined Cardinal Health, one of the big three U.S. drug distributors, where he studied many approaches to applying serialization and track and trace technology to solve supply chain integrity problems, meet regulatory requirements and simultaneously improve supply chain efficiencies. In 2003, he represented Cardinal Health on Accenture's seminal Jumpstart project, an early pharmaceutical supply chain RFID pilot.

Dirk has served on HDMA, NCPDP, EPCglobal, GS1 and GS1 US technical and standards work groups related to ePedigree, track and trace, RFID and barcodes. He served as co-chair of the GS1 EPCglobal Drug Pedigree Messaging (DPMS) work group and the GS1 Network Centric ePedigree (NCeP) work group, among others.

Throughout his career, Dirk's thought leadership has helped to expose hidden complexities and reveal surprising consequences and implications of drug serialization and pedigree laws, while also proposing novel ideas for addressing them.

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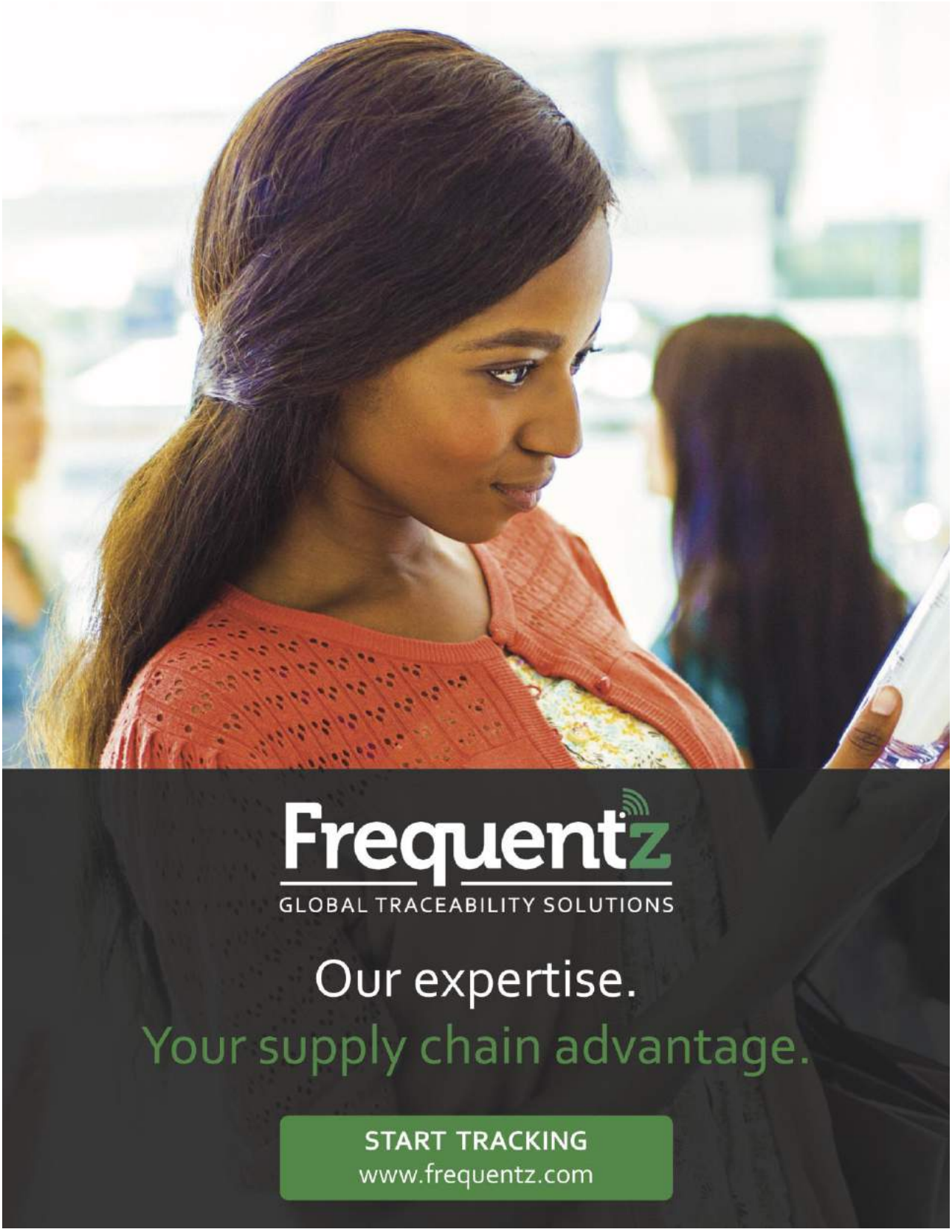
About the Sponsor: Frequentz

Frequentz is a global leader and champion of end-to-end visibility, offering comprehensive traceability, serialization and information management technologies. Their transformative tools bolster businesses and brand reputations by improving productivity, product quality, and profitability. To accomplish this, Frequentz provides valuable insight into end-to-end supply chains, and critical business processes by collecting, storing and analyzing serialized, life history data. Applications of its software are currently used in the life sciences, agricultural, fishery and sustainability, retail, and automotive industries worldwide and promote intelligent analytics and consumer safety. For more information visit www.frequentz.com.

Acknowledgments

The author would like to recognize and thank **Frequentz** for sponsoring this year's survey so that this document may be distributed without charge.



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Executive Summary

In November of 2013, the federal Drug Supply Chain Security Act (DSCSA) was enacted, creating new federal track and trace requirements for the pharmaceutical supply chain and preempting all state and federal serialization and pedigree laws. The 2016 RxTrace U.S. Pharma Traceability Survey, sponsored by Frequentz, is the third annual survey conducted by RxTrace since the passage of the DSCSA. This year, a total of 46 questions were asked to find out what the people who must meet the new DSCSA requirements are thinking. The survey was open to people who work for companies in the U.S. pharma supply chain and to solution providers targeting those businesses. Each respondent was asked questions that were pertinent to their type of business, so no individual was exposed to all 46 questions.

This report provides graphs to show the responses to the 24 questions that contained the most interesting and/or significant responses. The main findings are:

- Most companies were able to meet the 2015 DSCSA requirements on time, but a few are *still* unable to meet them;
- Most companies are storing DSCSA transaction documents electronically, but paper is being used for some transactions;
- Problems meeting the next DSCSA deadlines do exist, but most respondents felt confident they will probably still meet theirs;
- Most companies who use contract partners to package drugs are fairly confident in their ability to meet the November 27, 2017 deadline to apply serial numbers, but some serious problems do exist;
- Few packaging lines owned by contract partners of companies targeting the U.S. are converted to apply serial numbers;
- Most companies are offering various kinds of help to their contract partners to ensure they will be ready on time;
- Most companies have begun adding the components necessary to serialize, and most of the rest will start this year;
- Those that have already started have a long way to go;
- Wholesalers and 3PLs are receiving a small percentage of product with serial numbers today;
- Wholesalers and 3PLs will use a wide range of techniques to verify saleable returns after 2019 with no single technique dominating the others;
- There is still no consensus understanding over "aggregation data";
- A wide range of technologies are currently being used to exchange DSCSA transaction data;
- GS1's EPCIS standard will play a major role in the exchange of non-serialized and serialized DSCSA transaction data between now and 2023.

Introduction

The results of the 2016 RxTrace U.S. Pharma Traceability Survey, sponsored by Frequentz, are in. This survey provides a window into the thinking of the business leaders in the industry who are responsible for implementing procedures and solutions to meet the 2013 Federal Drug Supply Chain Security Act (DSCSA), which is embedded as Title II in the Drug Quality and Security Act (DQSA). This report provides a look at the opinions of these key leaders about some of the big technology decisions they are now facing. These leaders have now had two full years to read, understand and formulate plans for meeting the requirements. This year, most of the survey responses were collected in December of 2015, a full year after the initial DSCSA components went into effect for everyone, and eight months after drug manufacturers, repackagers and wholesale distributors were required to begin exchanging transaction data with each change of ownership. The initial deadline for dispensers to begin participating in that data exchange was delayed from July, 2015 to March, 2016 so those organizations had not yet begun exchanging transaction data. By the time this report is available, this deadline will have either passed, or the FDA will have pushed it out again.

The survey was open to all, regardless of their role inside or outside the supply chain, but each type of company was presented with a different set of questions, with a few questions being presented to all respondents. A total of 69 individuals took the survey this year. The survey was executed through SurveyMonkey.com. The wording of the questions and the answer choices in this report are reproduced here exactly as they appeared to the respondents when taking the survey.

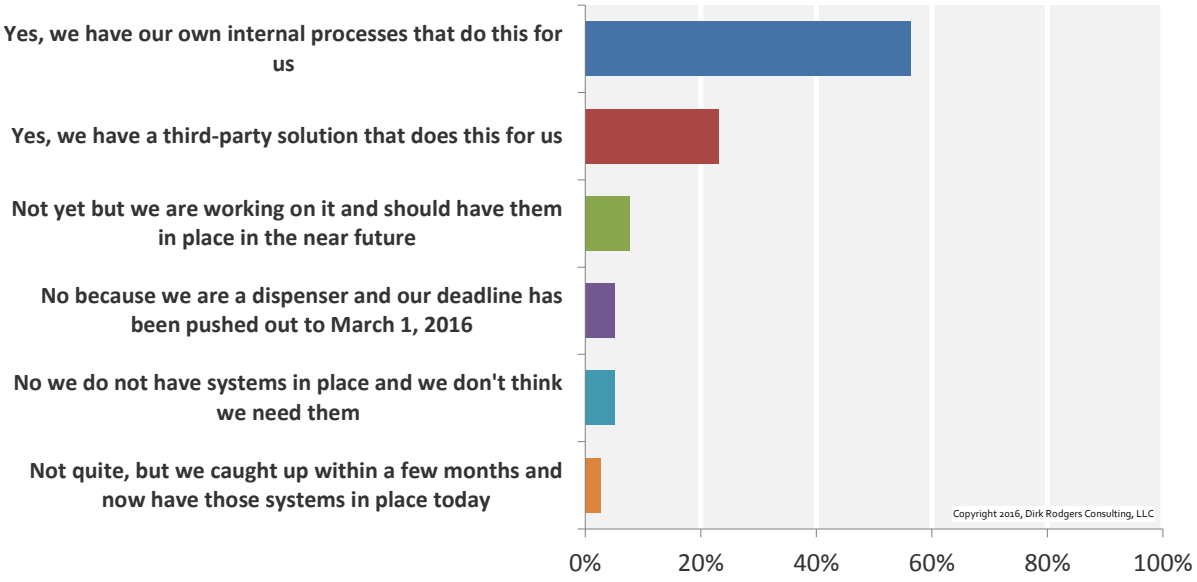
This final report is arranged into 13 sections that contain the key findings of the survey. Each section includes the analysis of one or more questions that were asked of a particular subset of the respondents based on their company's role. This year we asked a set of questions that were targeted specifically at dispensers. However, we do not believe enough dispensers participated in the survey for the results to have any meaning so we have suppressed those results from this report.

Overall, the survey indicates a positive outlook with most respondents reporting that they were ready for the deadlines they faced in the prior year and feeling confident that they have enough time to take action to meet their next deadline.

FINDING 1: Most companies were able to meet the 2015 DSCSA requirements on time, but a few are *still* unable to meet them.

QUESTION 1: Did your company begin fulfilling its 2015 obligations under the Drug Supply Chain Security Act (DSCSA) to have systems in place to quarantine and investigate suspect product on January 1, 2015?

(Asked of all members of the supply chain)



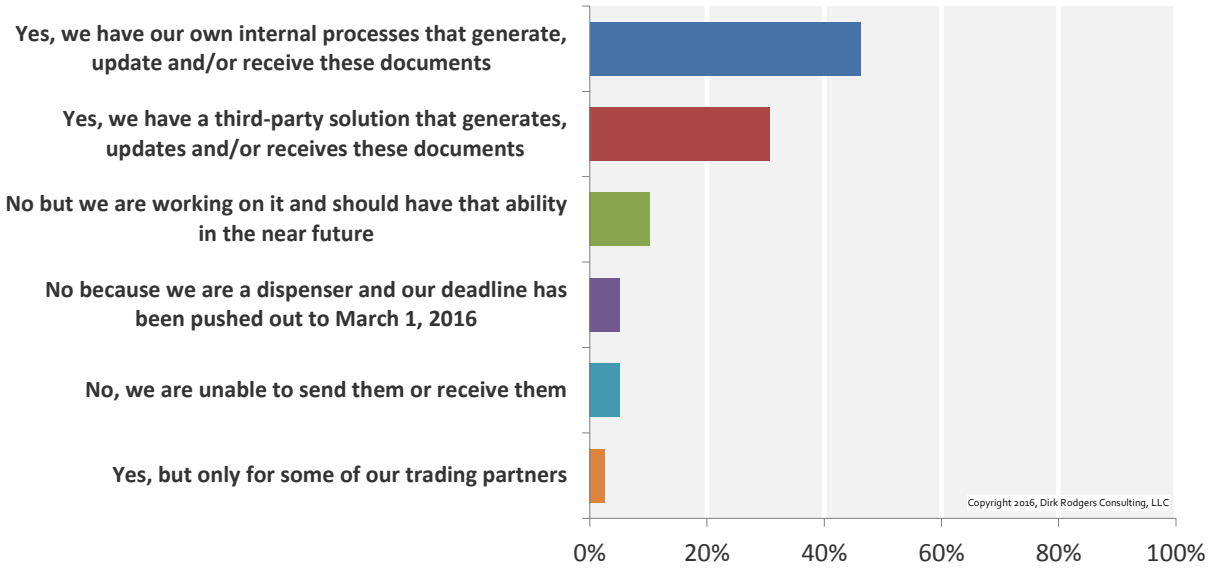
"Other" responses:

- *"Unknown"*

It's not surprising that some companies had trouble meeting this January 1, 2015 deadline, but it is surprising that there are a few companies out there (7.7%) that are still not yet able to meet this important requirement. And 5.1% do not think they need systems of this type. That *might* be true, depending on your definition of "systems", but companies in this category had better arm themselves with plenty of confidence in their understanding of what the law is expecting of them.

QUESTION 2: Is your company able to receive and send the necessary DSCSA transaction document documents from/to your trading partners?

(Asked of all members of the supply chain)



"Other" responses:

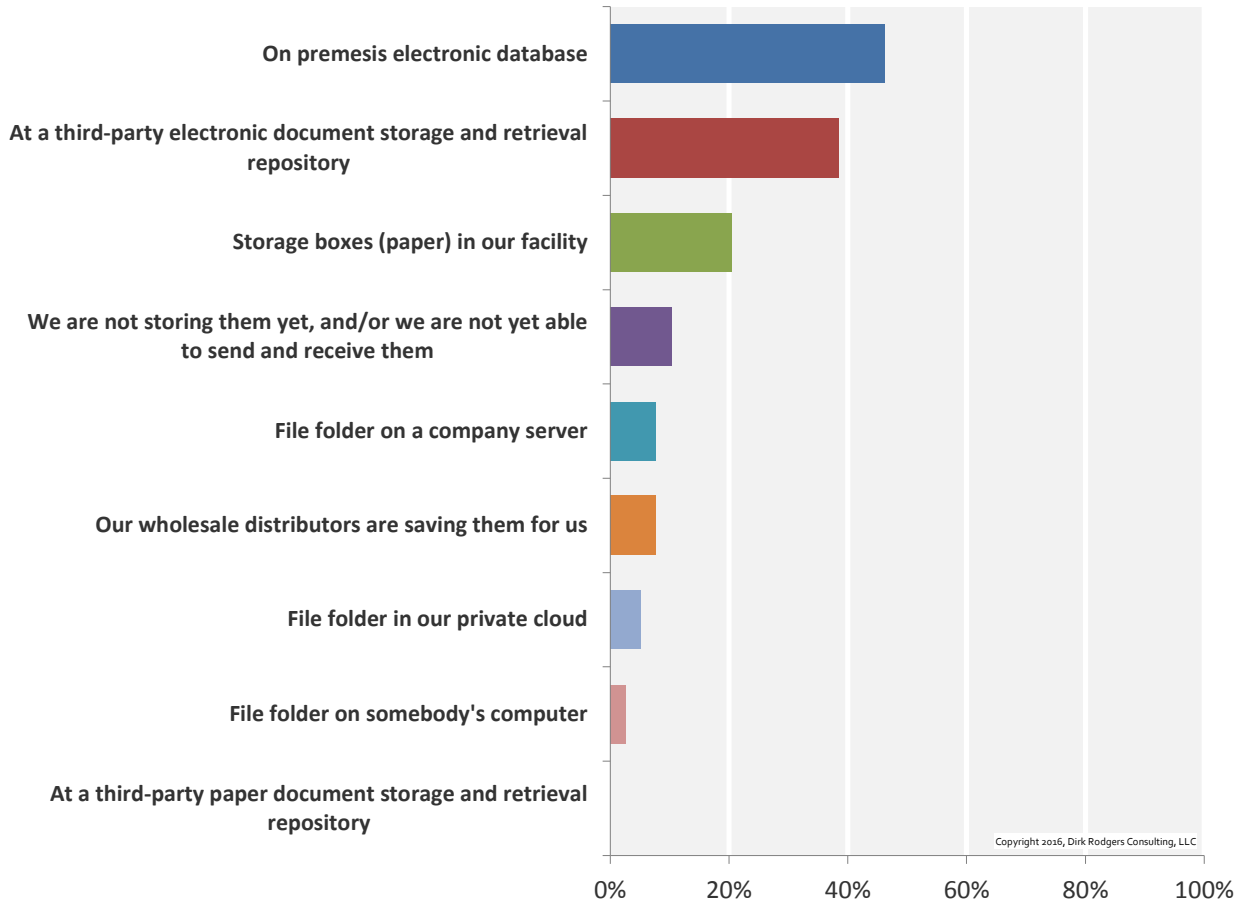
- *"Unknown"*

The only type of company that is not yet expected to have this ability at the time this survey was taken are dispensers, and there was a selection specifically for dispensers to answer, so you can assume the small number of other companies who are not yet able to exchange transaction data with every trading partner (18%) are non-compliant, and have been for many months. Perhaps some good questions would be, who is selling to you, and who is buying from you? Are they aware that you are not compliant with the DSCSA, and that may jeopardize their ability to comply?

FINDING 2: Most companies are storing DSCSA transaction documents electronically, but paper is being used for some transactions.

QUESTION 3: How are you storing the DSCSA transaction documents you send and receive? (check all that apply)

(Asked of all members of the supply chain)



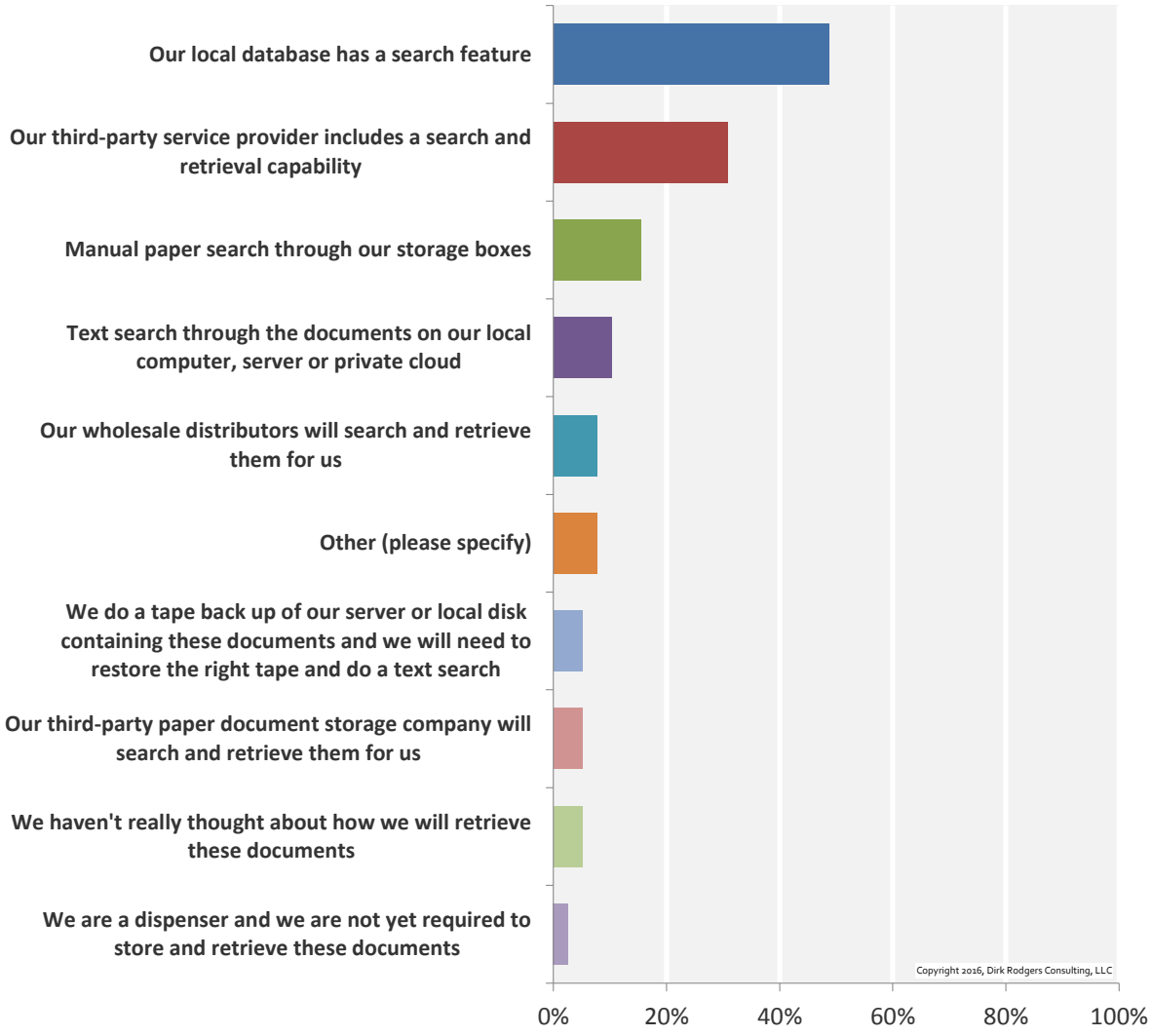
"Other" responses:

- *"Unknown"*
- *Paper Binder > 1%*

Most respondents appear to be on the right track, as far as we can tell, but companies who are not yet storing or sending/receiving these documents, or are relying on paper stored in boxes (20.5%), or in a file folder on somebody's computer (2.6%), should make sure you understand this regulatory requirement and plan out with a Standard Operating Procedure (SOP) exactly what you will need to do if/when the FDA or state regulator knocks on your door and asks for a set of these documents from the past. You might want to treat this as an element of "business continuity" planning.

QUESTION 4: What techniques will you use to search and retrieve DSCSA transaction documentation when asked by the FDA, a state regulator or a trading partner as part of an investigation? (check all that apply)

(Asked of all members of the supply chain)



"Other" responses:

- *"Unknown"*

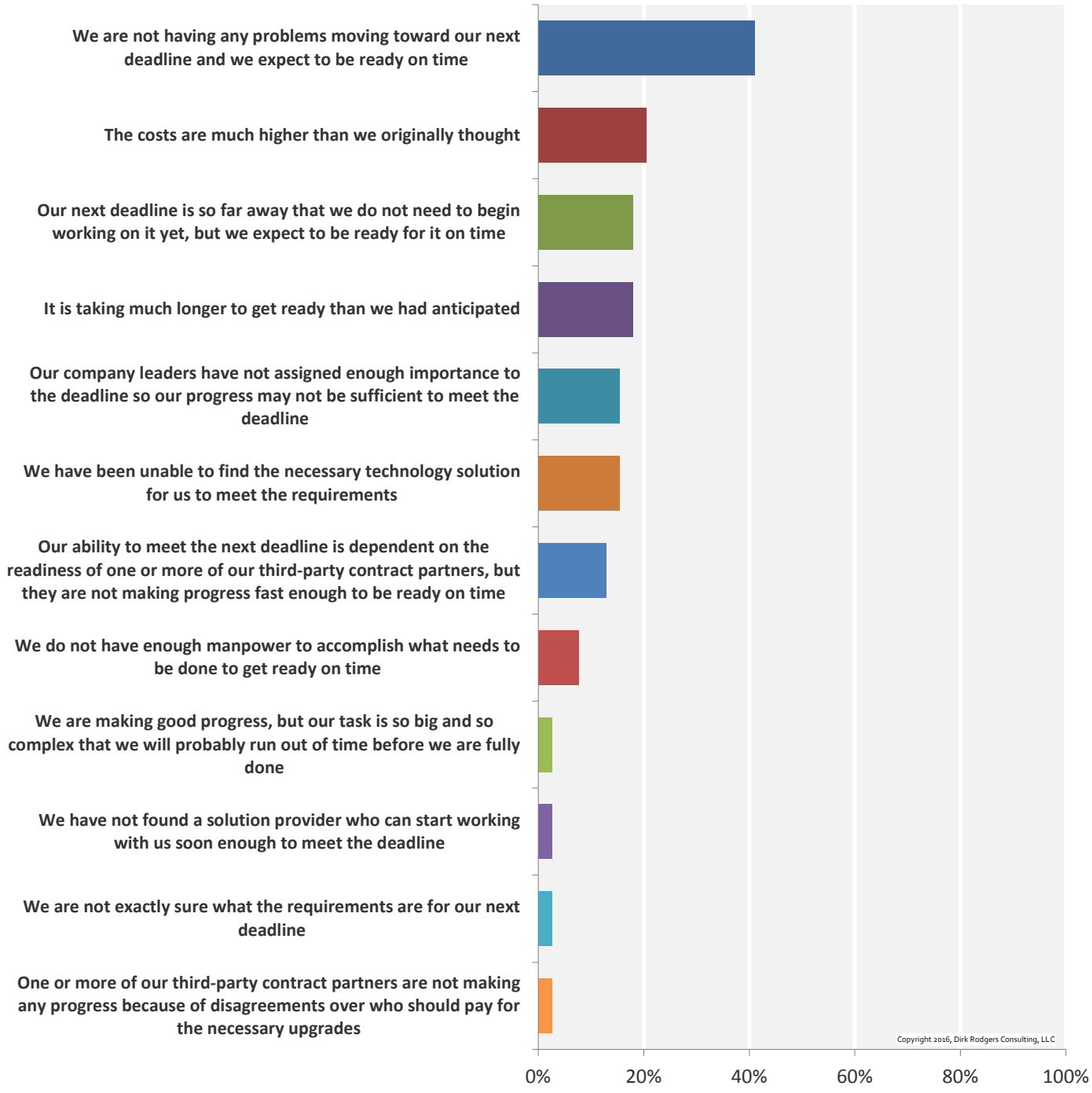
Like the responses to the previous question, these responses show that some companies are not taking this DSCSA requirement seriously enough. Read the RxTrace essay called "A Closer Look At The Six-Year Record-Keeping Requirement". Now is the time to think this through and recognize it as a very important area where your compliance efforts could easily fail.

Will your storage and retrieval capability be overwhelmed by the volume of documents over a six year period? Do you have a way to delete records that are beyond six years after the transaction they refer to? Will you be able to search through your records to find one document—or one hundred documents—over the last six years that are requested by a regulator, depending on the request, within the required 24 to 48 hour period?

FINDING 3: Problems meeting the next DSCSA deadlines do exist, but most respondents felt confident they will probably still meet theirs.

QUESTION 5: What problems are you having as you move toward meeting your next DSCSA deadline? (check all that apply)

(Asked of all members of the supply chain)



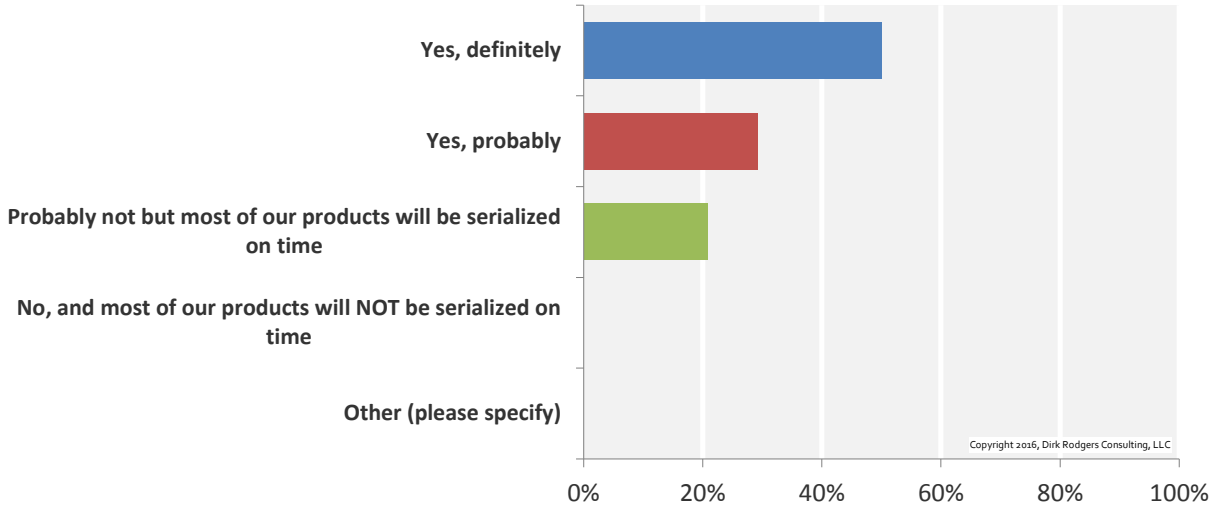
"Other" responses:

- *"Long, phased in, timelines (2017 to 2023) allow significant differences in strategic approach to meet requirements, for example, the timing for aggregation implementation. These differences and lack of pilots and/or guidance create uncertainty and risk of incompatible systems or strategies across the supply chain network."*
- *"No expected issues with internal readiness (internal pack lines; SN management/transaction IT solution)."*
- *"We are hindered by the readiness of the trading partners to receive the compliant transaction"*
- *"Emergent company, awaiting first product launch in 2017. Awaiting Phase 3 trial results before investing time in serialization. Simply ensuring that Contract Packager will be ready to serialize in 2017."*
- *"Not using EDI yet."*
- *"Some delays with our External Packaging partners versus original timelines but expect to be ready on time."*
- *"We have a dependency on contract manufacturers and it is clear most are not making any progress, but at this time it is difficult to say whether or not they have sufficient time to be ready for the next milestone."*

There are clearly a number of problems that companies are experiencing, but generally these responses are generally positive with only a small number of companies implying that these problems might result in missed deadlines. But notice that 17.9% of respondents said that it is taking them much longer to get ready than they had anticipated. That should be a warning to companies who have not yet started and who are planning to wait until the last possible moment to start. There is also some concern about contract partners impacting a respondent's ability to be ready on time.

QUESTION 6: Are you confident that your company will meet the serialization requirement on time?

(Asked of manufacturers and repackagers)

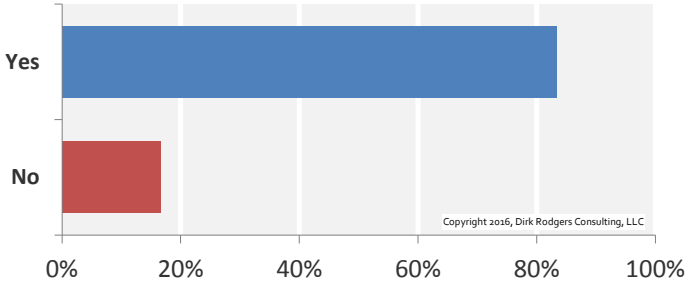


Here the question is asked directly of manufacturers and repackagers. A total of 79% of respondents indicated that their company would either definitely be ready on time, or would probably be ready. No respondent answered that they would not be ready on time and that most of their products would not be serialized on time. But 20.8% of respondents said that they probably will not be fully ready but that most of their products will be serialized on time. That sounds like perhaps a small amount of "discretionary enforcement" by the FDA in late 2017 might be sufficient to help get everyone across the finish line reasonably close to the deadline.

FINDING 4: Most companies who use contract partners to package drugs are fairly confident in their ability to meet the November 27, 2017 deadline to apply serial numbers, but some serious problems do exist.

QUESTION 7: Do you use contract partners to package some or all of your drugs for the U.S. market?

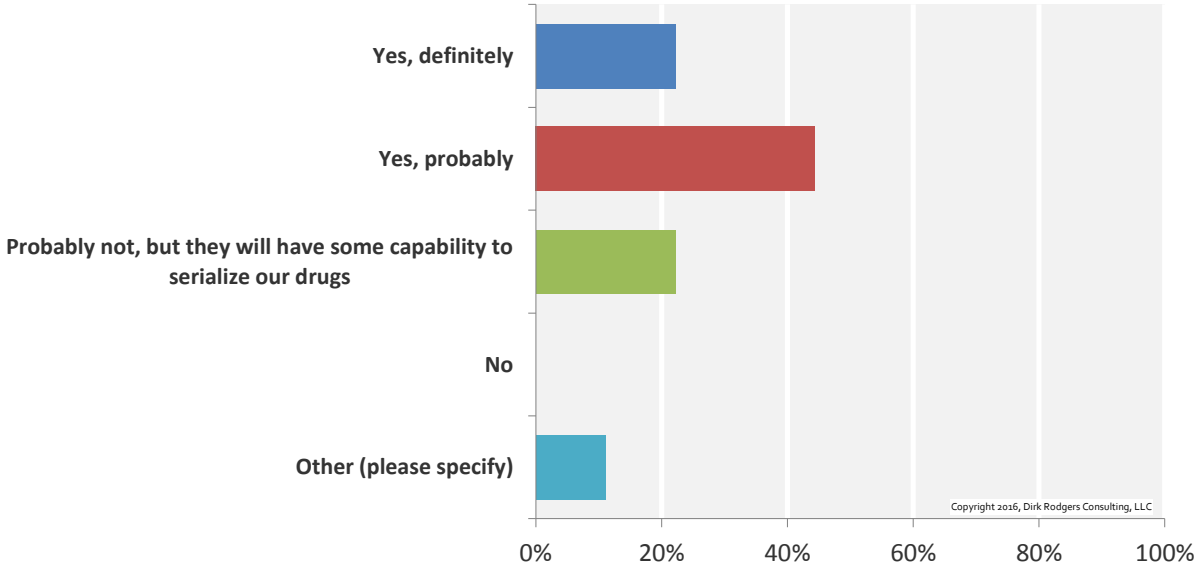
(Asked of all manufacturers and repackagers)



In this survey, more than 80% of drug manufacturers/repackagers make use of contract partners to package at least some of their drugs aimed at the U.S. market. That indicates that there are a lot of dependencies on third-parties that could affect the ability of these companies to make their serialization deadline. The FDA should take this into serious consideration between now and these deadlines.

QUESTION 8: Do you think your contract partner(s) will be able to fulfill the DSCSA serialization requirements for your products on time?

(Asked of manufacturers and repackagers who use contract partners to package drugs)



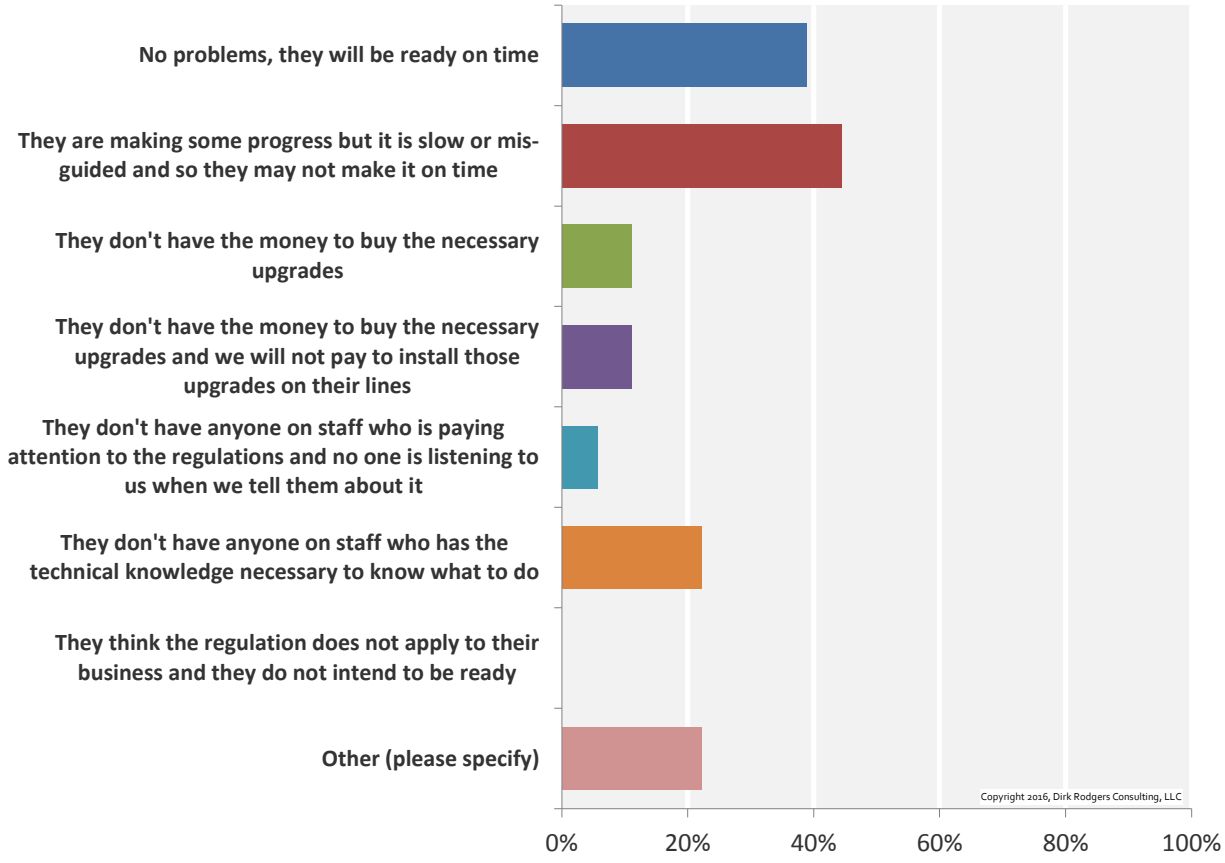
"Other" responses:

- *"Contract Packager is proposing end-of-line serialization suite solution. Remains to be seen if they have sufficient capacity to handle all customer's needs by November 2017.*
- *"Unknown"*

On the other hand, there seems to be a lot of confidence that these dependencies will not cause companies to miss their deadline, except for those 22% of respondents who use contract partners who are concerned that some of their products might not meet the deadline.

QUESTION 9: What do you think the problems are with getting your contract partner to be ready on time? (check all that apply)?

(Asked of manufacturers and repackagers who use contract partners to package drugs)



"Other" responses:

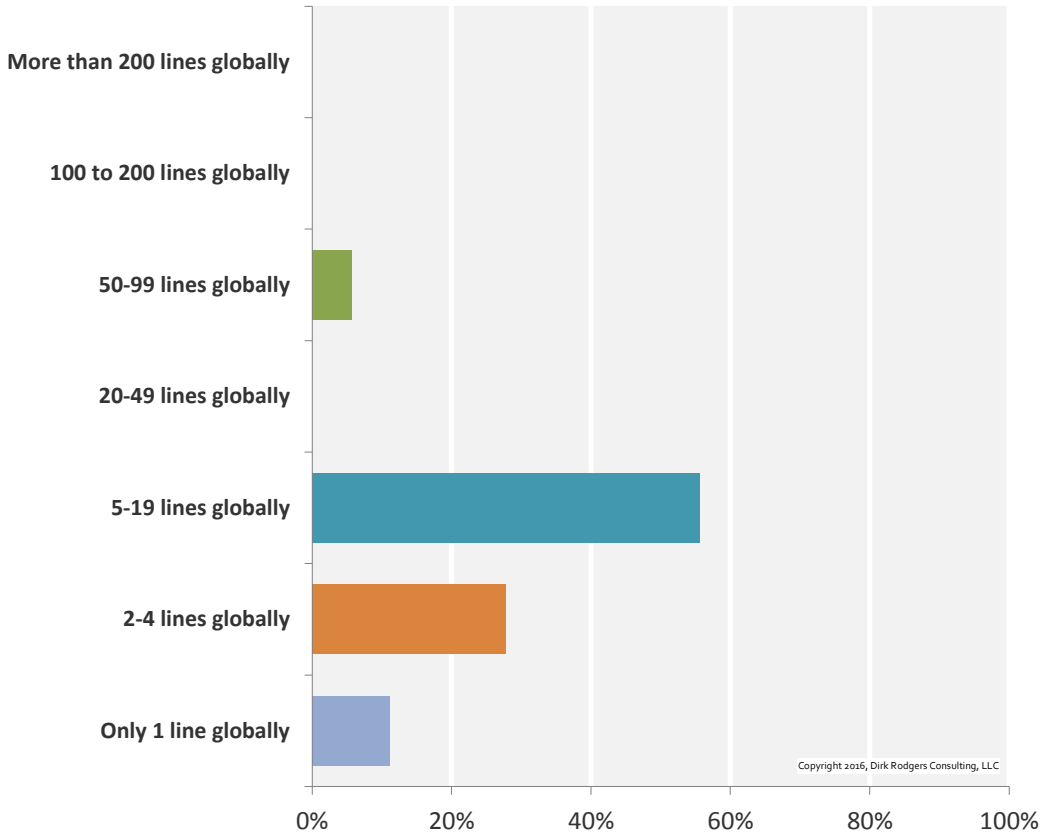
- *"Misalignment on requirements and price negotiation"*
- *"Capacity will be the issue in 2017. Can they get ALL customers done, if they are holding back on investments?"*
- *"Data communication challenges between us and our contract packagers"*
- *"Unknown"*

From these responses it appears that the major problems are related to the lack of understanding or expertise within the contract partner's organization. But it appears that no one is having trouble with a contract partner who doesn't believe it will be necessary for them to deploy compliant solutions. That's good news! It is also good news that only 11% of these respondents cited money as a problem—either that the contract partner does not have enough, or that, *and* the manufacturer/repackager is not willing to pay for the upgrades.

FINDING 5: Few packaging lines owned by contract partners of companies targeting the U.S. are converted to apply serial numbers.

QUESTION 10: Total number of packaging lines owned by your contract partners that package your drugs for the U.S. market? (Include all lines owned by your contract packaging organizations that package your product, include lines that have already been converted and those that are not yet converted)

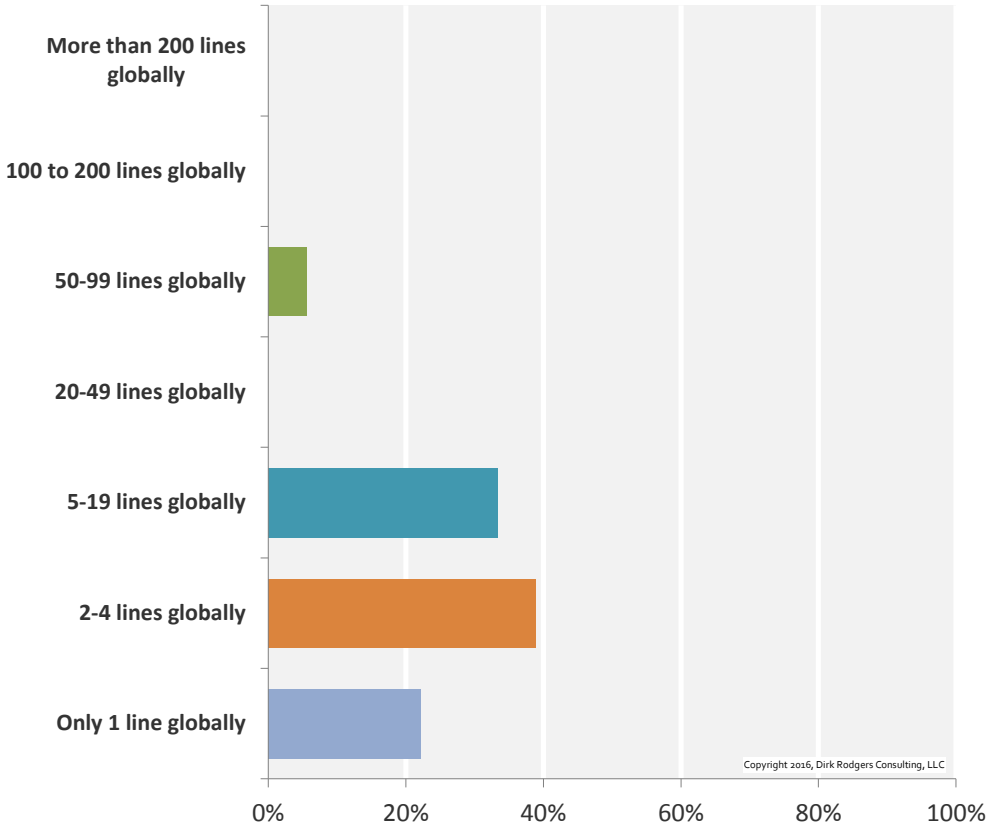
(Asked of manufacturers and repackagers who use contract partners to package drugs)



Most companies who use contract partners to package their drugs for the U.S. market make use of a relatively small number of packaging lines at those contract partners.

QUESTION 11: For packaging lines owned by your contract partners that package your drugs for the U.S. market, how many of these packaging lines are *not yet converted* to add serial number application? (Only include lines owned by your contract packaging organizations that package your product, and only include lines that are not yet converted)

(Asked of manufacturers and repackagers who use contract partners to package drugs)

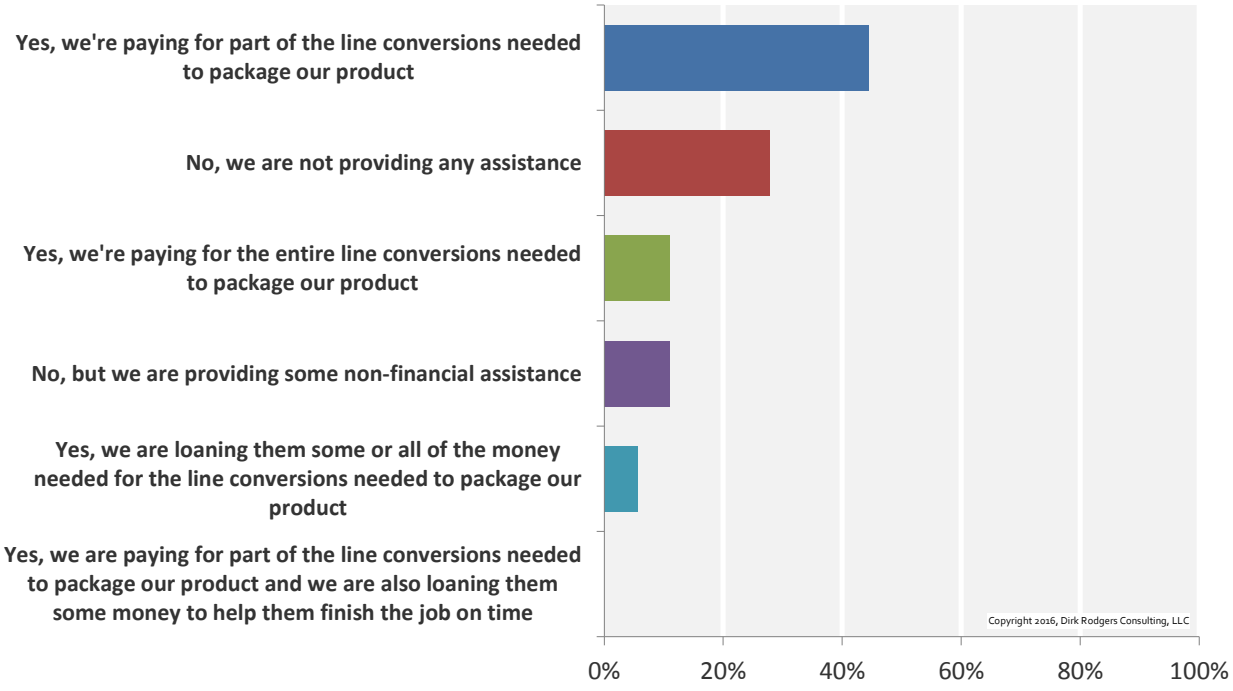


Comparing this graph to the previous one shows that few contract partner packaging lines are converted for serialization yet. However, some progress is evident.

FINDING 6: Most companies are offering various kinds of help to their contract partners to ensure they will be ready on time.

QUESTION 12: Are you providing any financial help to your contract partners to help ensure they will be ready to meet the DSCSA serialization requirements on time?

(Asked of manufacturers and repackagers who use contract partners to package drugs)



"Other" responses:

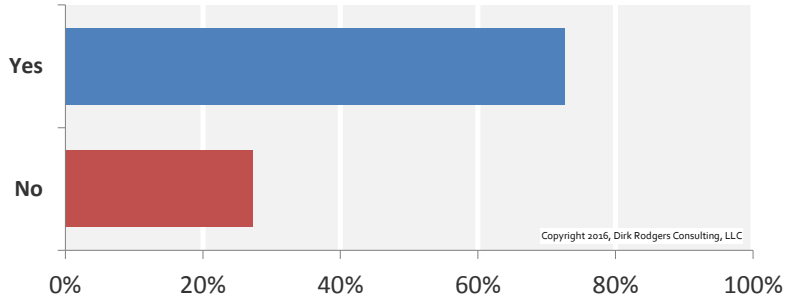
- *"terms for CMOs not yet finalized. Situation could also vary by CMO."*
- *"Still TBD for most of our CMOs; increase in COGS 21xpected for sure on the back end."*
- *"Financial details are not yet finalized, but we expect to bear some of the contract partner's costs."*

When reading these results, recognize that some manufacturers/repackagers make use of larger contract partners who have many lines and many clients, and who may not expect their clients to provide financial or other assistance in meeting the DSCSA deadlines. So it is not surprising that 27.8% of respondents said they are not providing any assistance. Other manufacturers/repackagers might make use of smaller, dedicated contract partners who have no other means to finance the necessary upgrades and so require the manufacturer/repackager to provide some kind of financial help. This maked up over 60% of the responses.

FINDING 7: Most companies have begun adding the components necessary to serialize, and most of the rest will start this year.

QUESTION 13: Have you started working on adding the components necessary to serialize the drugs you manufacture or repackage?

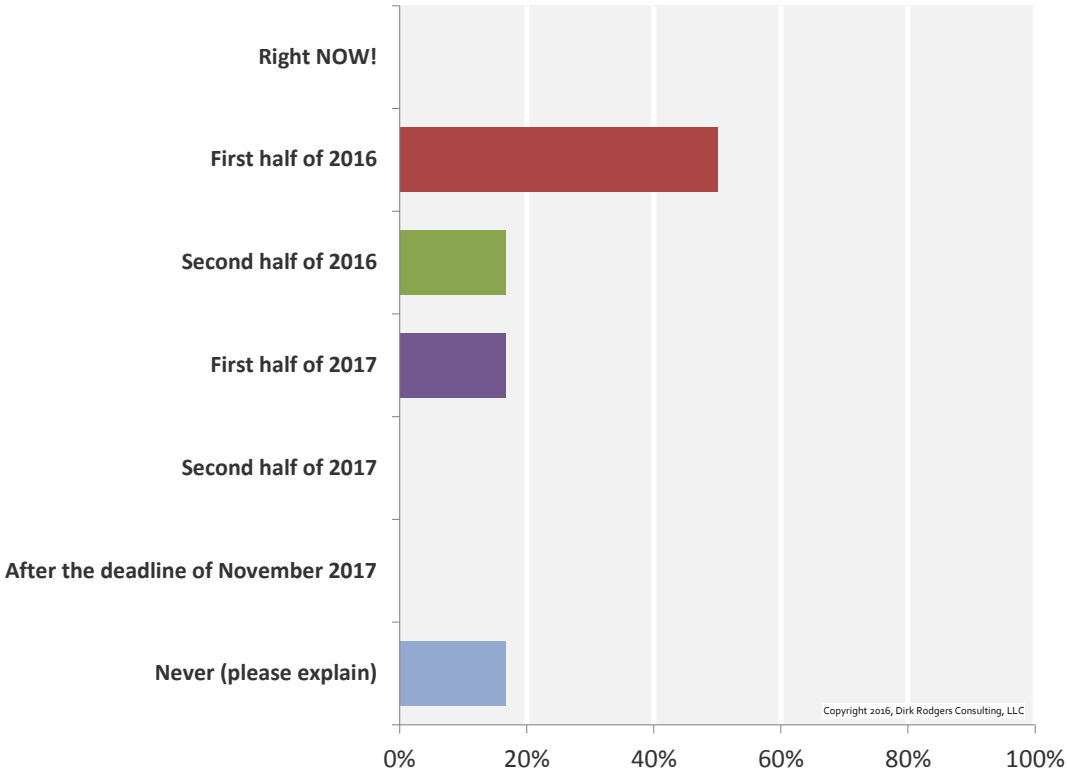
(Asked of all manufacturers and repackagers)



When asked directly, 72.7% of the respondents said they had begun adding the components necessary to serialize the drugs they manufacturer or repackage. That leaves 27.3% who have not begun yet.

QUESTION 14: When do you plan to begin the work necessary to add serial numbers to your U.S. products?

(Asked of manufacturers and repackagers who have not yet started)



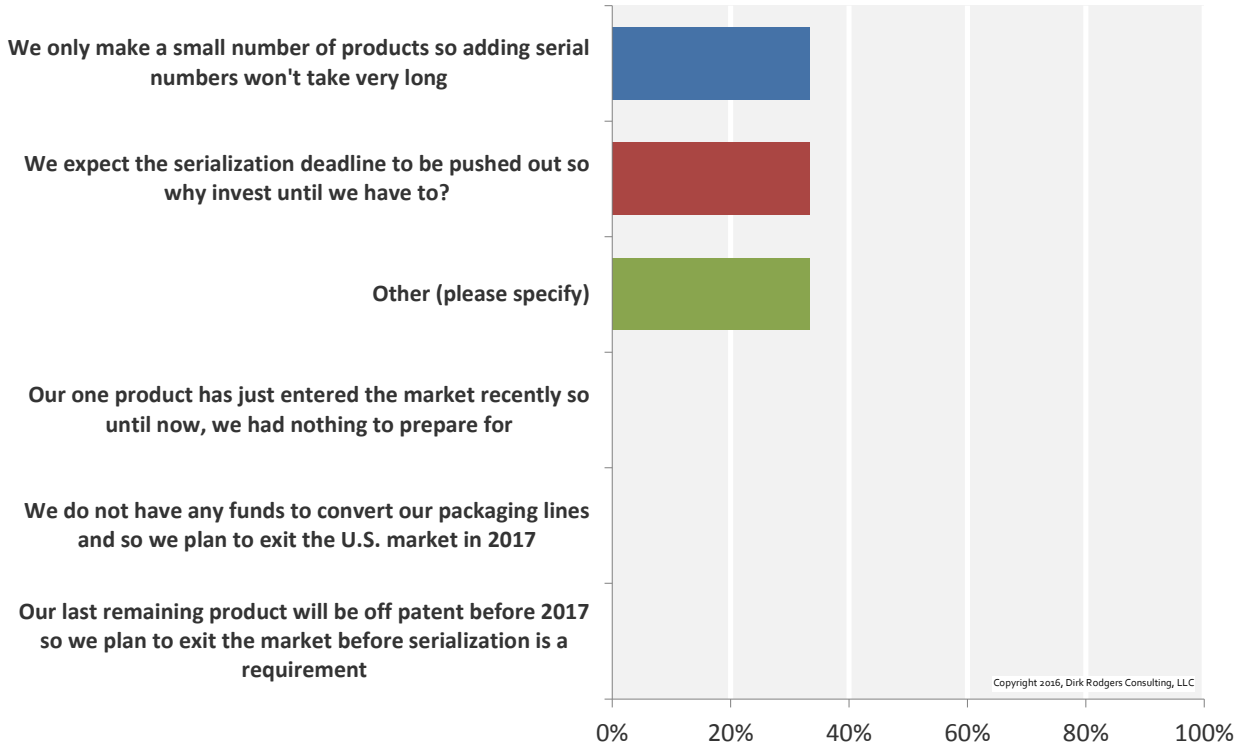
"Other" responses:

- *"Waiting for Phase 3 results, NDA filing and approval. Hope to incorporate serial numbers in launch packaging for 2nd half of 2017, just before the DSCSA mandate takes effect."*

Of those few who have not yet begun, most plan to begin in the first half of this year.

QUESTION 15: What has held you up from starting before now?

(Asked of manufacturers and repackagers who have not yet started)



"Other" responses:

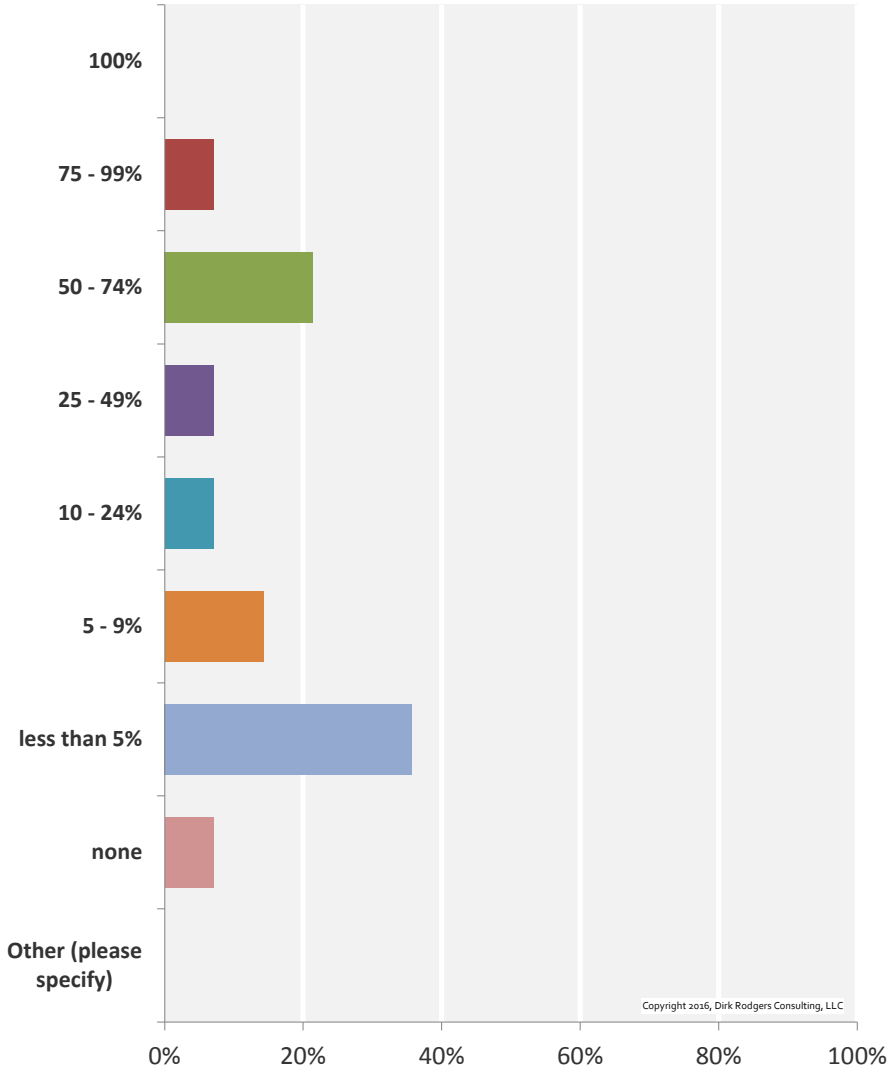
- *"We expect to be acquired by another company in 2016"*
- *"Single product to launch in 2017"*

The reasons for not starting yet are split between companies who make only a small number of products, and those who thought the law was going to get delayed again. Of course, the kind of delay these companies are thinking is not the 4 month delays that the FDA has provided so far, but more like the kind of delays that the old Prescription Drug Marketing Act of 1988 and the California ePedigree law, which were both delayed for years, and then never fully went into effect. That's a gamble that is not likely to pay off this time around, and could end up hurting you. Notice how few companies are making that gamble along with you!

FINDING 8: Those that have already started have a long way to go.

QUESTION 16: What percentage of your total packaging lines are fully converted and ready to apply DSCSA-compliant package-level and case-level product identifiers right now?

(Asked of manufacturers and repackagers who have begun adding serialization systems)



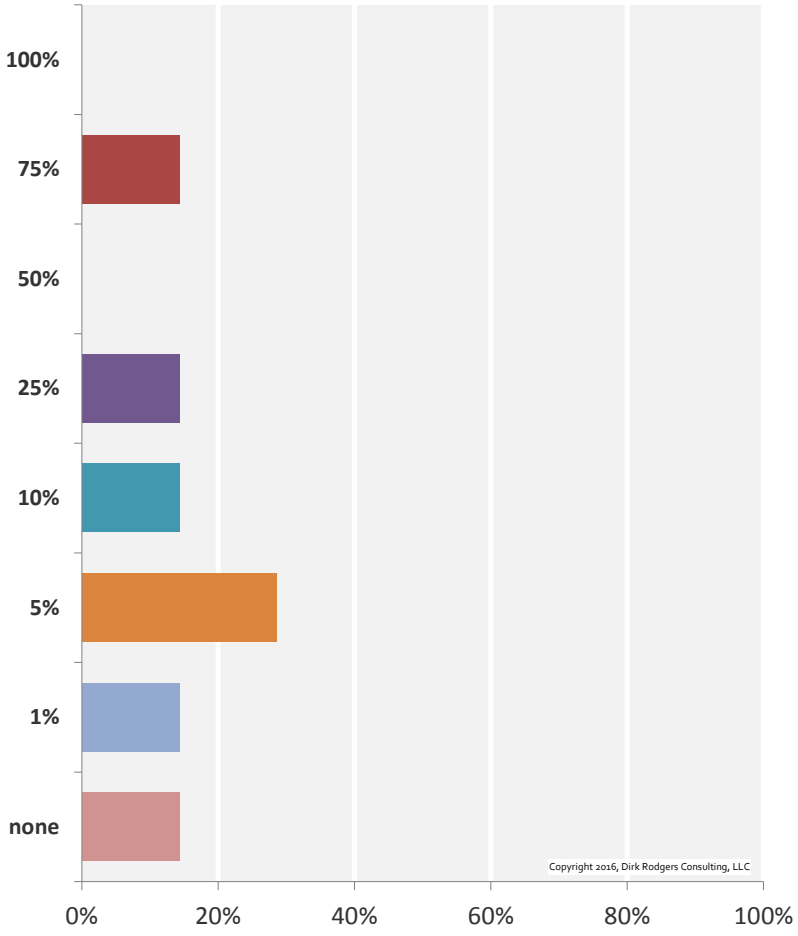
A few companies have made good progress with 28.5% of manufacturers/repackagers having 50% or more of their packaging lines converted already. But that compares poorly with the 35.7% of those companies who have converted less than 5% of their lines, and the 7.1% who have converted *none*. No respondent indicated that 100% of their lines are converted, but that's probably the least surprising result on this graph.

Wholesale Distributors and 3PLs

FINDING 9: Wholesalers and 3PLs are receiving a small percentage of product with serial numbers today.

QUESTION 17: Approximately what percentage of the drugs you receive for distribution from all sources have 2D barcodes on them TODAY?

(Asked of all wholesale distributors and 3PLs)

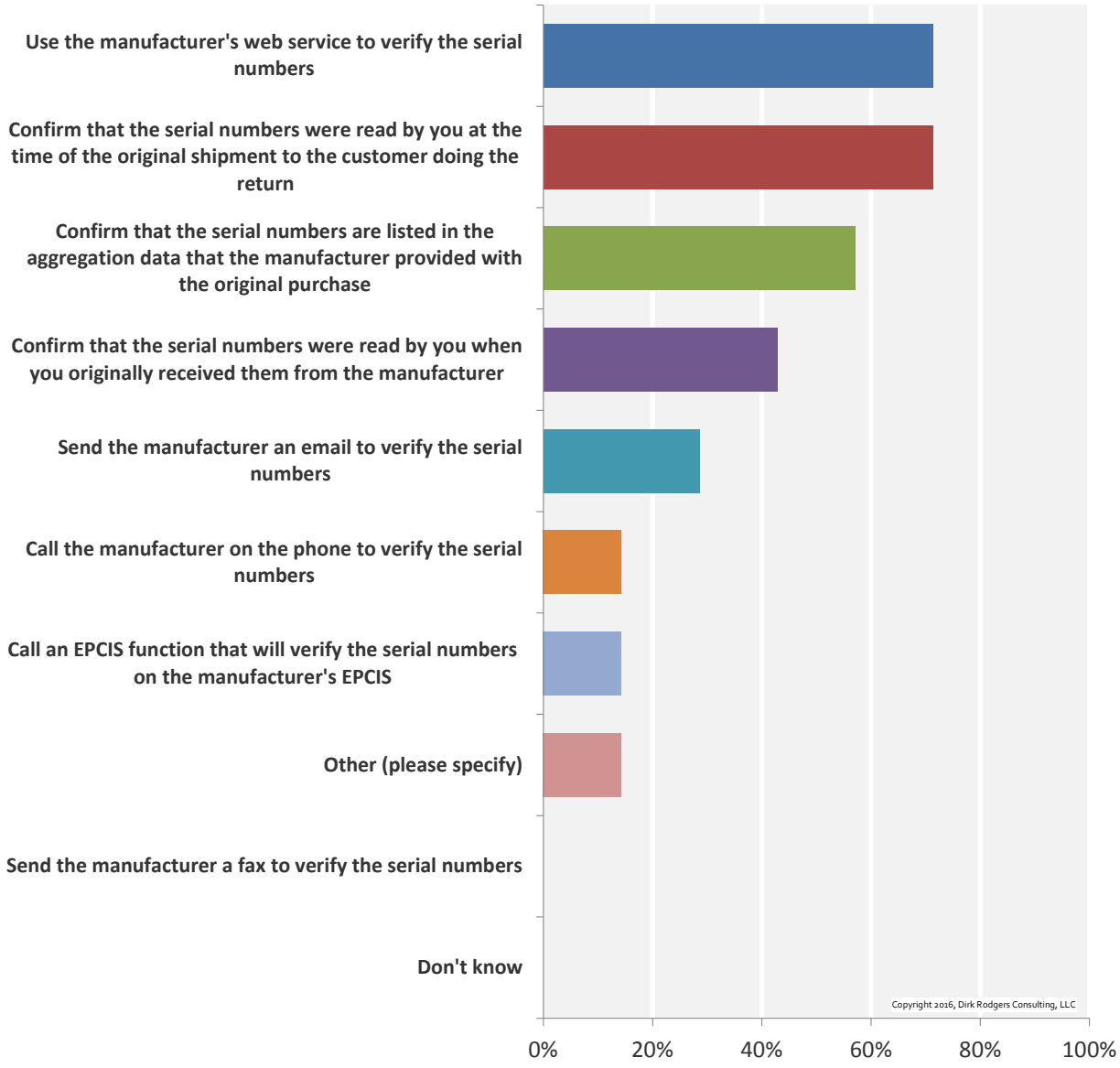


This is the reciprocal question to those that were asked of the manufacturers/repackagers. That is, this asked the wholesale distributors and 3PLs to report what percentage of the drugs they receive today are serialized. With so few of this type of respondents, these results may not carry much meaning and the wide range of responses may indicate that our question was confusing. Only 14% of respondents said that they were not receiving any serialized products. The biggest response was that about 5% of the drugs being received today are serialized. This percentage should rise quickly during 2016 and, hopefully will be close to 100% in about 18 months.

FINDING 10: Wholesalers and 3PLs will use a wide range of techniques to verify saleable returns after 2019 with no single technique dominating the others.

QUESTION 18: When you receive saleable returns after November 27, 2019, what techniques to you expect to use to verify those products ("verify" in the DSCSA sense)? (check all that apply)

(Asked of all wholesale distributors and 3PLs)



"Other" responses:

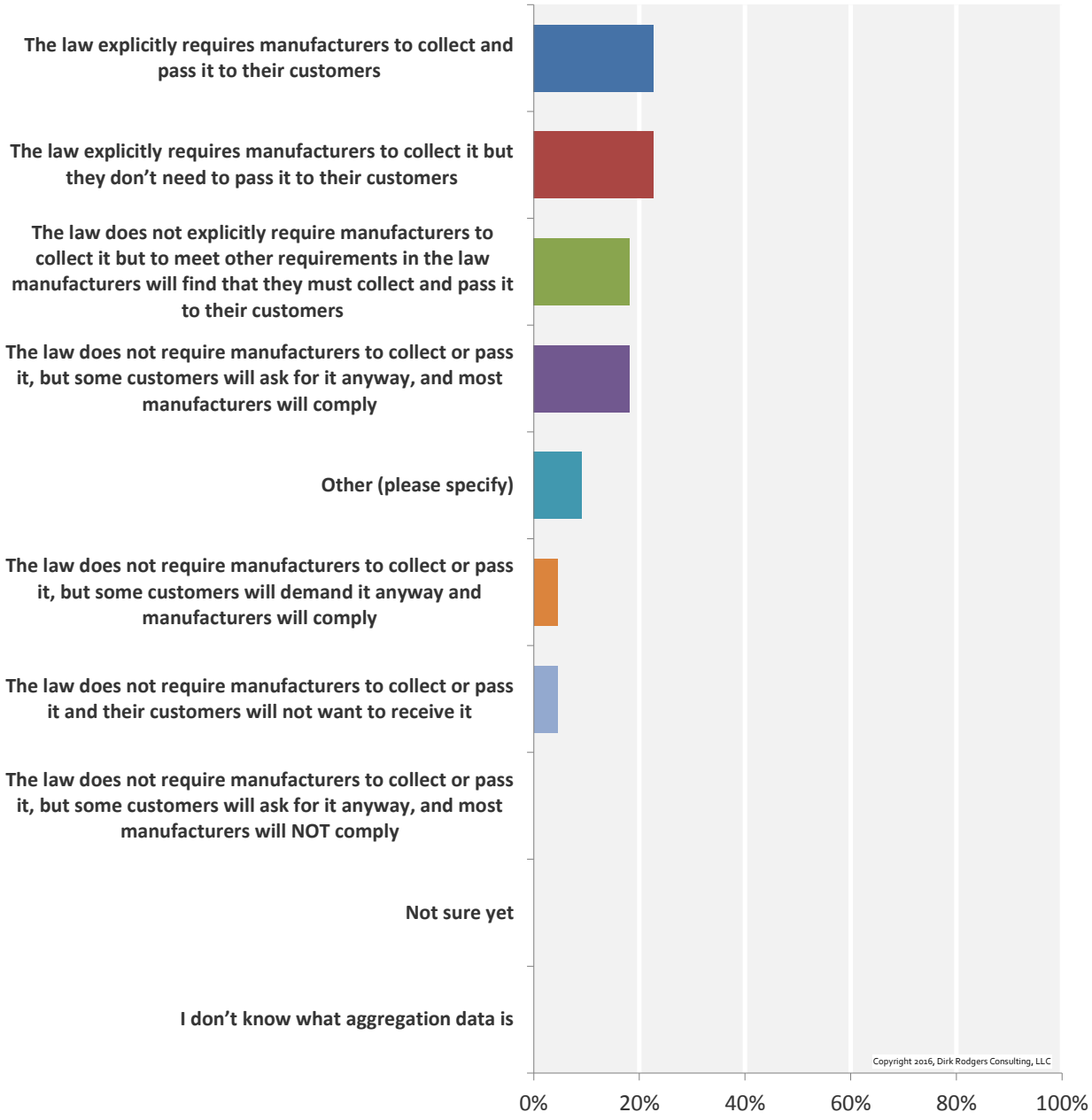
- *"Whatever way is most efficient as well as cost effective."*

This question was an attempt to find out which techniques wholesale distributors think they will make use of to verify saleable returns after the law requires them to do so using serial numbers for the first time in 2019. There is some controversy over these techniques and the Healthcare Distribution Management Association (HDMA) is currently conducting a pilot to help study these and perhaps other techniques for meeting this requirement. The majority of wholesaler and 3PL respondents indicated that they currently believe they would use a manufacturer's web service, and/or confirm that the returned drugs were included in the set of serial numbers they originally shipped out, and/or make use of the manufacturer supplied aggregation information. Fortunately no respondent thought they would send the manufacturer a fax to request verification!

FINDING 11: There is still no consensus understanding over "aggregation data".

QUESTION 19: What is your interpretation of the Federal DSCSA regarding "aggregation data" during the first 10 years (phase 1)?

(Asked of all manufacturers, repackagers, wholesale distributors and 3PLs who knew something about "aggregation data")



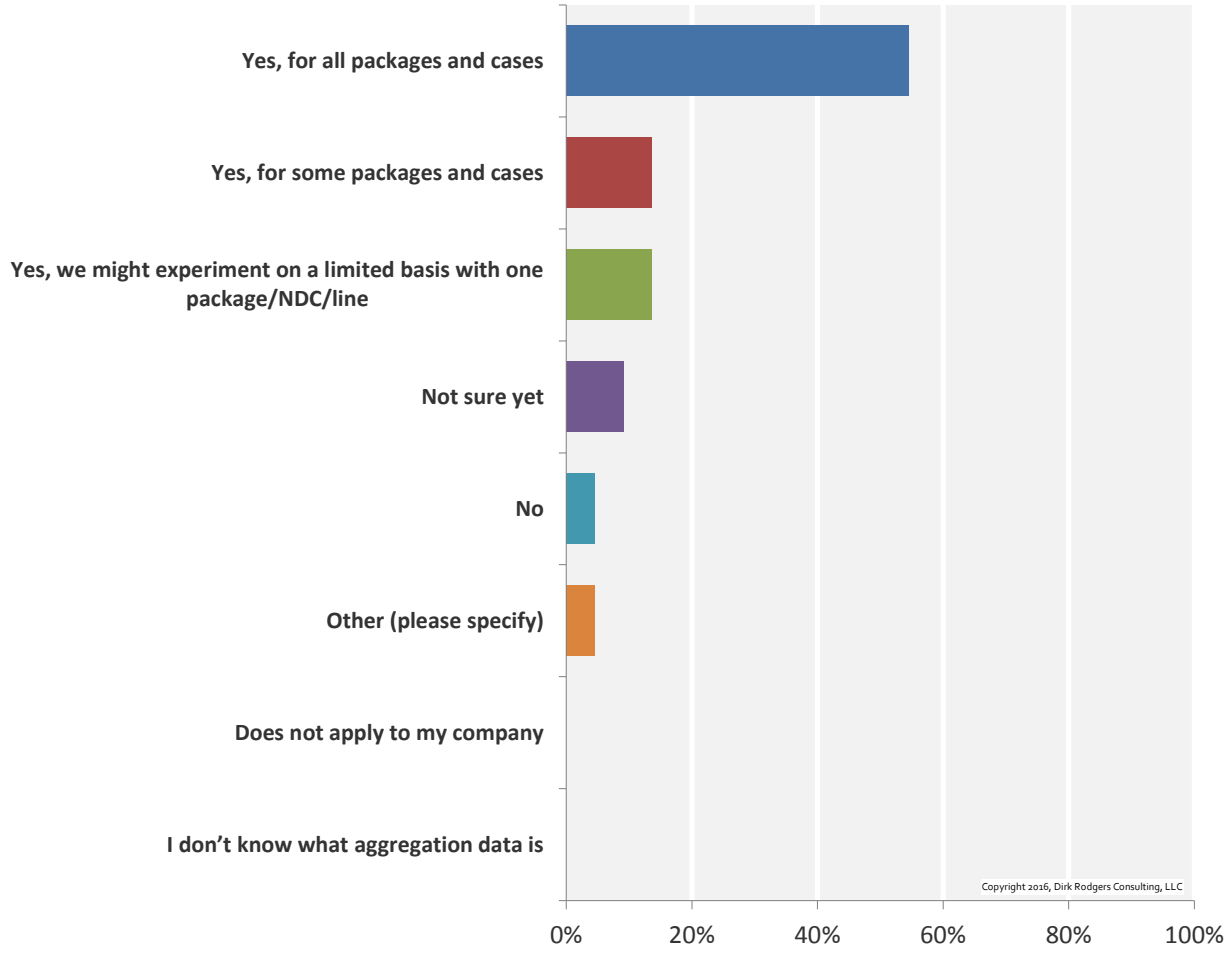
"Other" responses:

- *"The law does not require it, some will ask for it, and some mfgs. will provide it."*
- *"With a wholesaler model for distribution and possible future business benefits, it makes sense to provide aggregation data. To not aggregate would be penny-wise & pound-foolish."*

It is surprising that the highest percentage of any one response to this question was only 22.7%, and that occurred on two responses. And the diversity of opinion is still pretty wide on this question. However, when compared with last year's results, the interpretation of this section of the DSCSA is sliding. Last year the combined responses indicated that 68% believed that the law does NOT explicitly or implicitly require the collection and passing of aggregation data. This year, only 55% believe that, leaving 45% who believe the law *explicitly requires it*. With that difference of opinion getting closer to 50-50, it is likely to result in diametrically opposed opinions about how this verification should be implemented between wholesaler and manufacturer/repackager, regardless how the HDMA pilot turns out. Perhaps the FDA needs to provide their interpretation of the law underlying this question to help settle the disputes.

QUESTION 20: Do you think your company will capture "aggregation data" prior to 2023 for your own uses whether or not it is required or your customers demand/request it?

(Asked of all manufacturers, repackagers, wholesale distributors and 3PLs who knew something about "aggregation data")



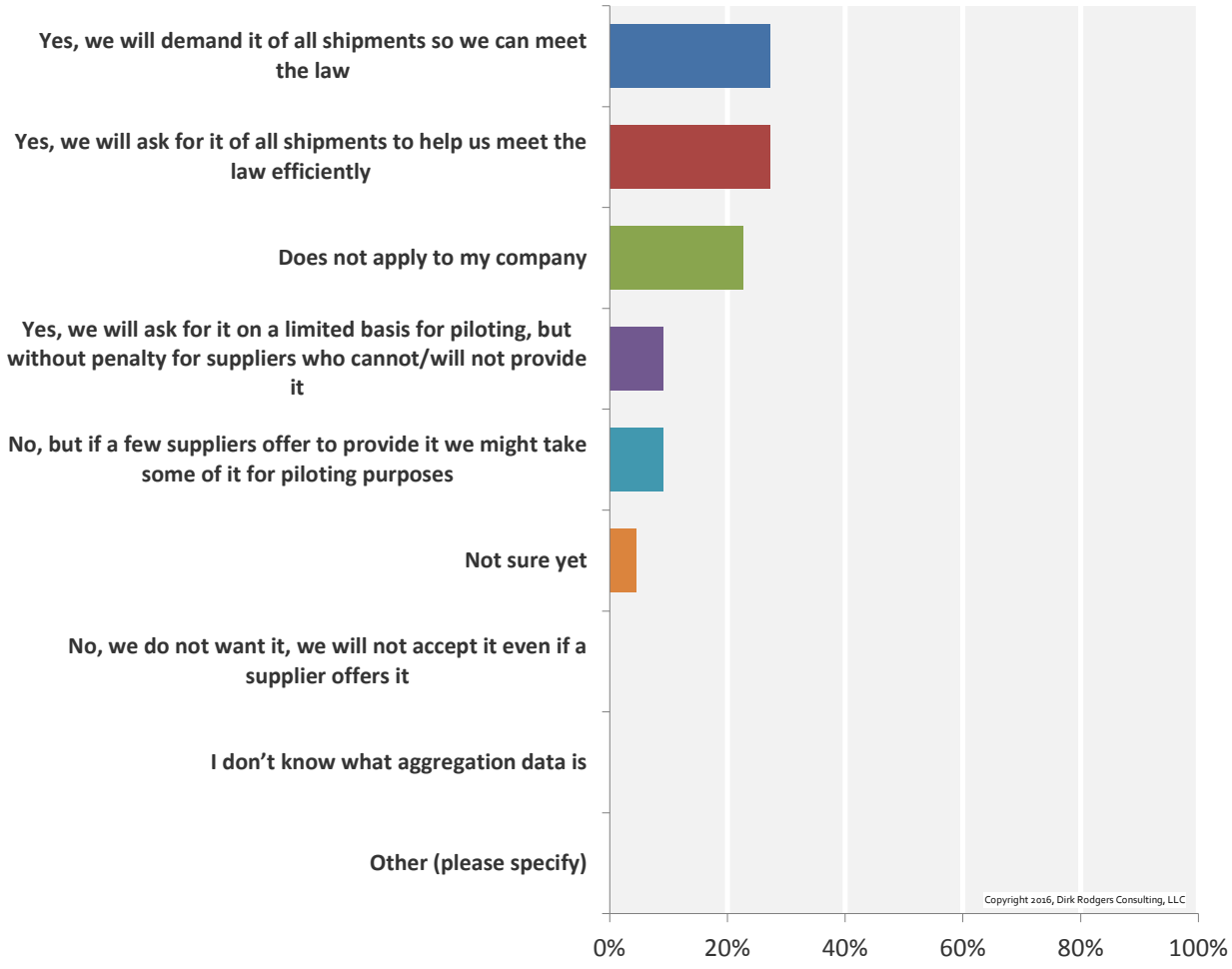
"Other" responses:

- *"We will encourage all upstream partners to send it and we will capture aggregation for any/all that arrives. This will minimize our dependency on manufacturers for SNI verification."*

But regardless of the results of the previous question, the vast majority of respondents said they do intend to capture aggregation data prior to 2023 (when it will likely be even more necessary), even if is not required, and even if their customer does not demand it of them. Less than 5% said they would not capture it and 9% said they were not sure yet. Overall, these responses include wholesale distributors, some of whom apparently also intend to capture that data for their outgoing shipments.

QUESTION 21: Will your company request your suppliers to provide "aggregation data" for some/all shipments prior to 2023?

(Asked of all manufacturers, repackagers, wholesale distributors and 3PLs who knew something about "aggregation data")



The majority of respondents said they would either demand, or ask for aggregation data from their suppliers so they can meet the law, or meet it efficiently.

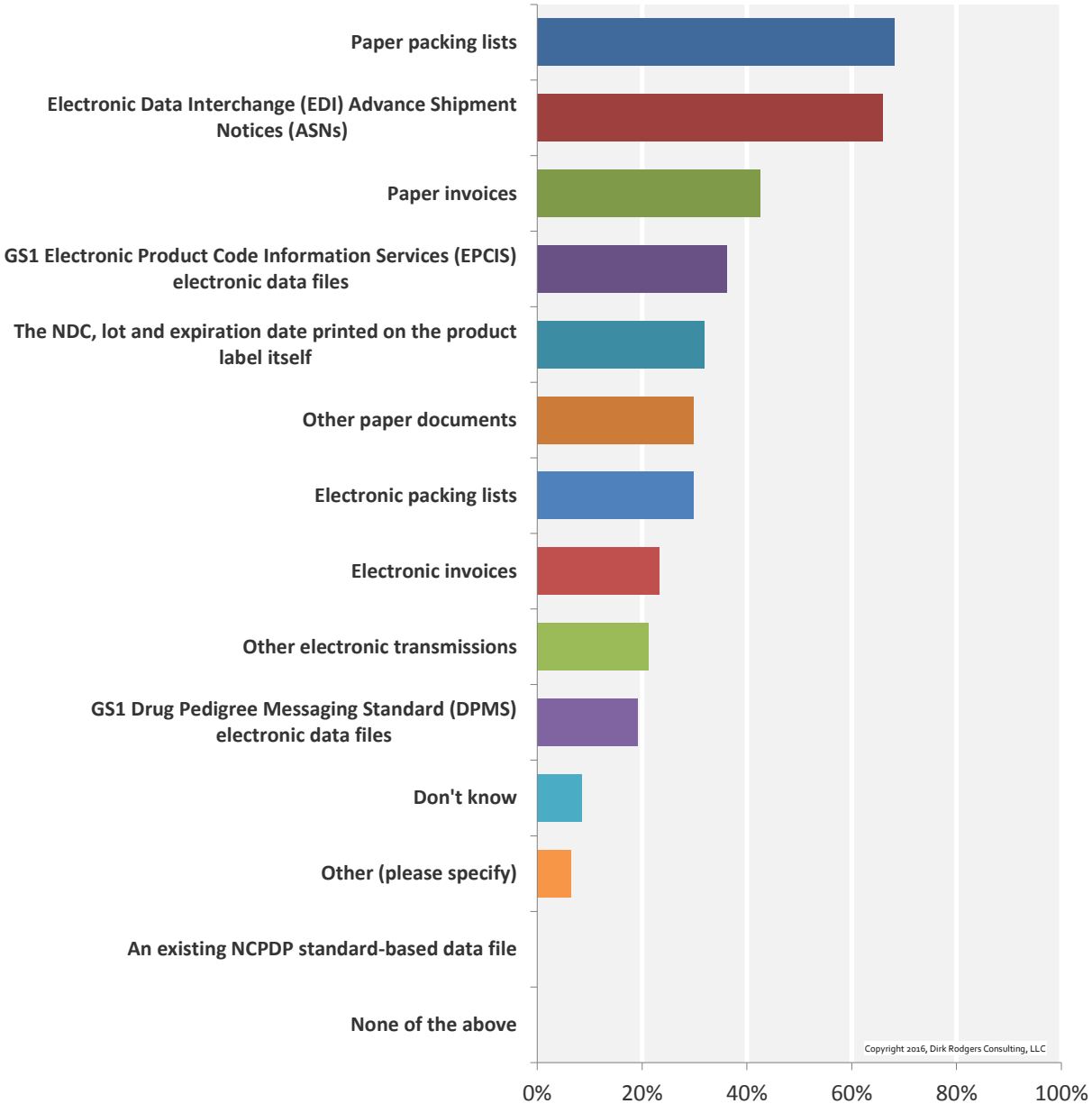
The results of the series of aggregation data questions are clear. Companies in the supply chain recognize the value and the importance of aggregation data for their own efficiencies and/or those of their trading partners. Clearly, whether or not the DSCSA explicitly or implicitly includes a requirement for companies to provide aggregation to their downstream trading partners, it is going to get done, and it will get done before 2023.

All Respondents

FINDING 12: A wide range of technologies are currently being used to exchange DSCSA transaction data.

QUESTION 22: Which technologies do you know are currently being used by the industry to fulfill the requirement to pass transaction information, transaction history and transaction statements? Choose all that apply.

(Asked of all respondents)



"Other" responses:

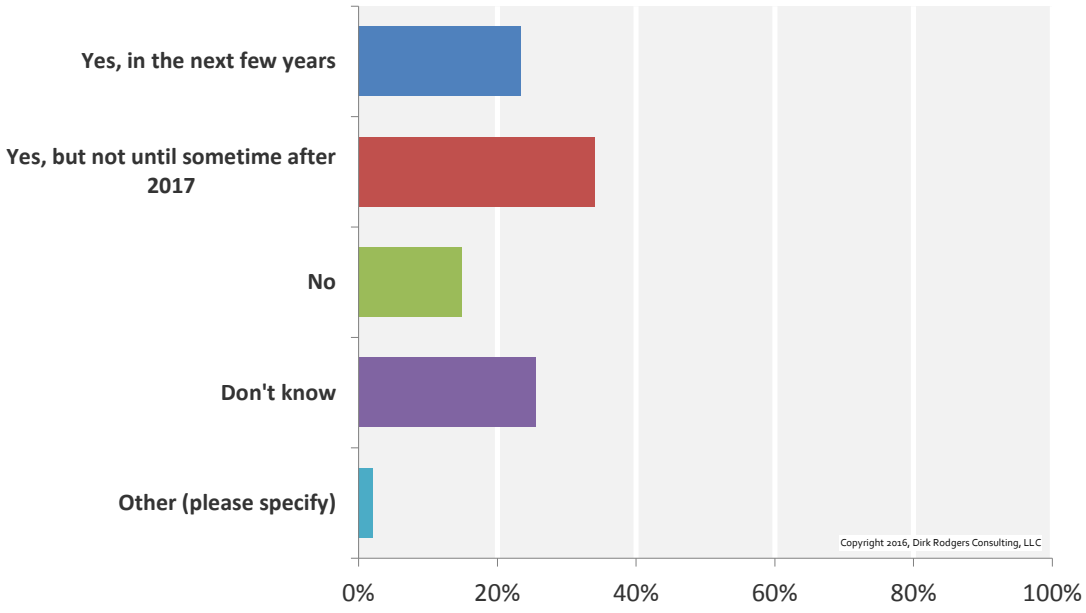
- *"Web portal"*
- *"Securpharm"*
- *"Pedigrees"*

There is a wide diversity of technologies currently employed to exchange the DSCSA transaction documentation (TI, TH and TS). That will likely make it challenging for some companies to keep track of all of the documents for the mandated six years, and that could make it difficult for them to properly comply with the requirement to produce only certain documents when requested during an investigation into suspect product. Companies who generate and/or receive transaction documentation using multiple technologies must be diligent in how they store, search and retrieve those documents. It is impossible to predict which document(s) you will need to provide to the FDA, a State Board of Pharmacy, or a trading partner (or even yourself) who is conducting an investigation, within the mandated 24-48 hours (determined by what role you fill in the supply chain). Implementing a single index to your multiple document stores will help you meet this requirement.

FINDING 13: GS1's EPCIS standard will play a major role in the exchange of non-serialized and serialized DSCSA transaction data between now and 2023.

QUESTION 23: Do you think a significant number of companies in the supply chain will eventually switch to using GS1's EPCIS standard to exchange *non-serialized* DSCSA transaction data?

(Asked of all respondents)



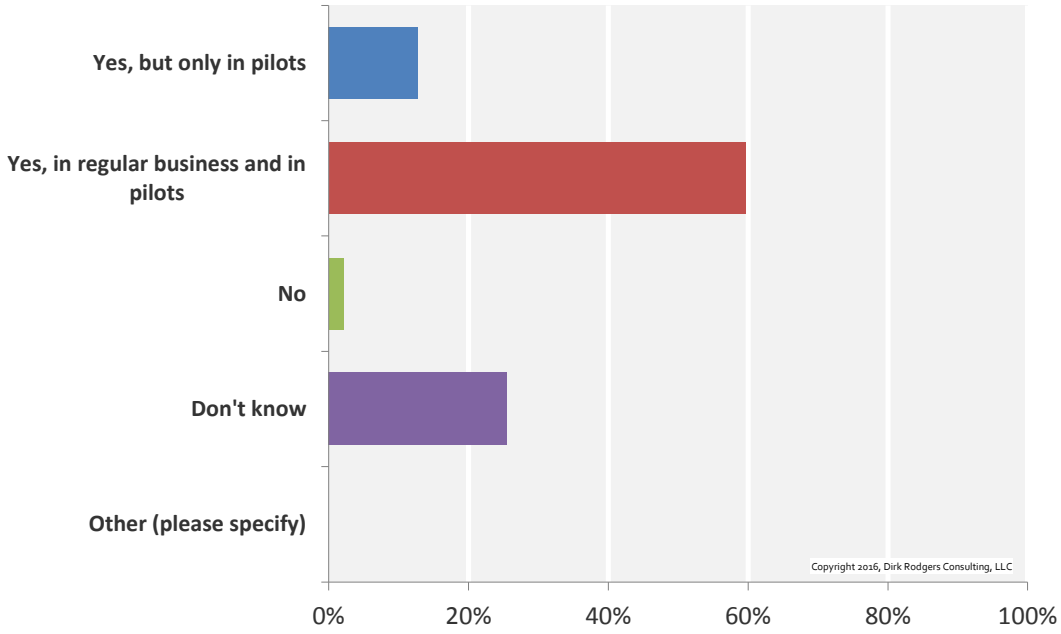
"Other" responses:

- "If 'The Killer-App' comes around the corner - they will jump on it, because everybody is not happy!"

The majority of respondents (a combined 57%) believe that GS1's EPCIS standard will be used to exchange non-serialized DSCSA transaction data. That is somewhat surprising since Electronic Data Interchange (EDI) is being used so widely for that today. To switch non-serialized data exchange from EDI to EPCIS would require some non-trivial effort, only to be quickly followed by a transition to serialized data exchange between 2017 and probably 2019.

QUESTION 24: Do you think there will be a movement in the industry toward using GS1's EPCIS standard to pass *serialized* transaction data before it is required in 2023?

(Asked of all respondents)



A combined total of over 72% believe that GS1's EPCIS standard will be used to pass serialized transaction data before 2023 in either regular business and/or pilots. This is clear evidence that the interface standard will be used to guarantee interoperability for all DSCSA transactions. From 2017 onward, it will become increasingly important for companies to only invest only in DSCSA solutions that are built with the EPCIS standard at their core. That will likely become an absolute necessity to participate in the U.S. pharma supply chain at some point over the next five to seven years.

Conclusion

This is the third annual RxTrace survey to measure the thinking of key members of the U.S. pharma supply chain and solution providers targeting those companies about the Federal DSCSA. As companies in the

U.S. pharma supply chain grapple with exactly what the DSCSA means to their business and what it will require them to do to comply with it, an understanding of what other companies are doing and what their key people are thinking is very important. This survey provides an updated glimpse at their thinking.

As the lessons of the 2016 RxTrace U.S. Pharma Traceability Survey, sponsored by Frequentz, indicate, companies appear to be making solid progress toward the 2017 requirements of the DSCSA and they remain upbeat about their ability to comply on time.

Thank you to those who contributed their responses and opinions to the survey and to those who downloaded this report. Remember to subscribe to RxTrace to keep up-to-date on the lessons explored in this survey as well as others, and watch for a new RxTrace Pharma Traceability Survey every December. Please make sure you participate next time.

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