5th September 2018

Subject: Temporary importation of unlicensed VIAFLEX 0.9% Sodium Chloride 1L from the USA to address manufacturing disruption in UK

Dear Customer,

In order to address shortages of critical drug products following a continued disruption in the supply of our IV Solutions, Baxter is coordinating with the MHRA to increase the availability of products from Baxter's manufacturing facility in the USA.

The information contained in the letter pertains only to the product listed below. You may be provided with additional letters depending on the products you receive. Please read each letter in its entirety because the letters may contain different information.

Baxter has initiated temporary importation of the product in the table below. This product is manufactured by Baxter's manufacturing facility in the USA and primarily marketed in the USA. It has been imported with the agreement of the MHRA on a temporary basis under The Human Medicines Regulations 2012 (SI 2012/1916). This product is registered by Baxter in the USA under NDC-0338-0049-004, NDA016677.

Effective immediately, and during this temporary period, Baxter will offer the following product to NHS Hospitals in England and Wales as an alternative to its UK Viaflo equivalent product FKE1324 0.9% Sodium Chloride Solution for Infusion 1000ml.

Product Name	Size	US Product Code	Pack Factor
Sodium Chloride 0.9% in VIAFLEX Container	1000 mL	2B1324X	14 per box

There are some key differences in the labeling between the UK marketed product and the imported US product. Please see the additional information at the end of this letter for:

Attachment 1: Comparison Table of UK product vs imported US product
Attachment 2: FAQ document for customer use

It is also important to note the following:

- While the injection or medication ports are similar, the administration port protector on the imported US product must be pulled off rather than twisted off.
- The imported US product's administration port is fully compatible with IV set spike heads that meet the International Organisation of Standardisation (ISO) standards with Baxter IV sets marketed in the UK. However, the technique used to insert the set into the port may be different to current practice. Please refer to the FAQ document for more details.
- Prior to use, it is important to check for leaks by squeezing the inner bag firmly. If leaks are found, discard solution as sterility may be impaired. Additionally, check to see that solution is clear and free of foreign matter. Discard the solution if solution is not clear.
- Periodically the imported US VIAFLEX container may display characteristics of opaqueness, cloudiness, haziness, circular patterns or white patches on the surface. This is referred to as "Blush". There can be two types of blush associated with VIAFLEX Containers, Water Blush

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and Contact Blush. Both are cosmetic in nature and do not affect the concentration of the solution within the container. Refer to the FAQ for further information.

- Sometimes moisture may be observed within the overwrap. Refer to the FAQ for further information.
- The barcode is different on the imported US stock and if hospitals use the barcode, they should check that the barcode systems do not provide incorrect information when the product is scanned.
- The pack factor of the replacement code is 14 per box, rather than 10 per box. In order to enable ease of ordering and invoicing, it is important that customers set up the new code in their ordering systems. The new code should appear on purchase orders dated from 10th September onwards, when the imported stock will be ready to ship.

Product Name	Size	US Product Code	Pack Factor	GTIN /EAN Code for Carton	GTIN /EAN Code for Unit
Sodium Chloride 0.9% in VIAFLEX Container	1000 mL	2B1324X	14 per box	50303380049047	00303380049042

If you require a copy of the leaflet for the UK approved product please refer to the online Baxter Product Catalogue, within the Clinical Data section for Product Code FKE1324, or to the Marketing Authorization Holder on 01635 206345.

To place an order, please contact Baxter Customer Service on 0800 0289 881.

Adverse Events and any suspected defective medicines should be reported.
Reporting forms and information can be found at www.mhra.gov.uk/yellowcard

Adverse Events relating to Baxter products can also be reported direct to Baxter Pharmacovigilance on 01635 206360, or by email to vigilanceuk@baxter.com.

Any drug product quality complaints (including suspected defective medicines) relating to Baxter products can be reported directly to the Baxter Country Quality Assurance Team on 01604 704603, or by email to UK_SHS_QA_Complaints@baxter.com. Alternatively, please report directly to your Baxter Account Manager who will take the details and forward to the Baxter Country Quality Assurance Team.

If you have any questions about the information contained in this letter, or the use of the imported US product, please contact your Baxter Account Manager or Baxter Medical Information on 01635 206345.

Yours faithfully

Victoria Franklin
Product Manager – UK & Ireland
Baxter Fluid Systems

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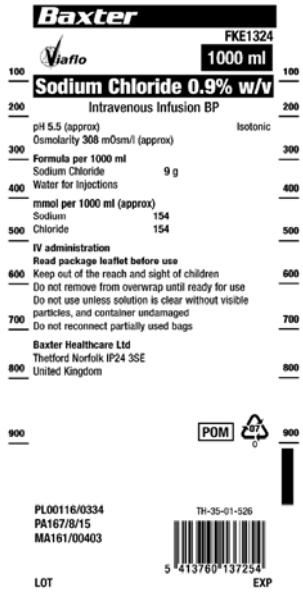
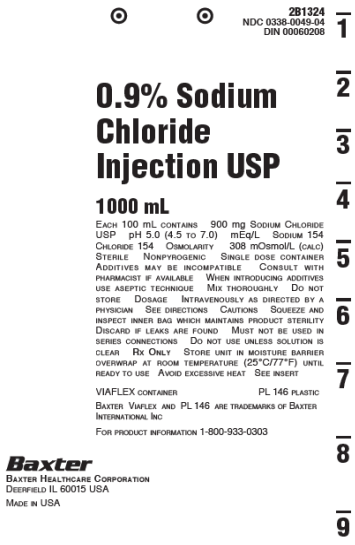
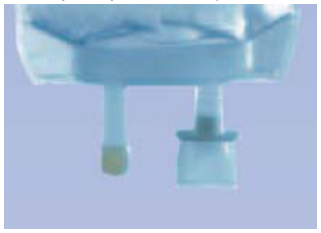
Attachment 1

Comparison Table of UK product vs Imported product

	UK Licensed Product Product code **FKE1324**	Imported Product Product code **2B1324X**
Bag label		
Product Name	Sodium Chloride 0.9% w/v Intravenous Infusion BP	0.9% Sodium Chloride injection, USP
Licence Status	UK registered product under Marketing Authorisation PL00116/0334	Unlicensed product imported with the agreement of the MHRA on a temporary basis under The Human Medicines Regulations 2012 (SI 2012/1916). Registered in the USA under NDC-0338-0049-004, NDA016677
Indications	Treatment of isotonic extracellular dehydration Treatment of sodium depletion Vehicle of diluent of compatible drugs for parenteral administration	Indicated as a source of water and electrolytes
Active	Sodium 154 mmol/L, Chloride 154 mmol/L	Sodium 154 mmol/L, Chloride 154 mmol/L
Excipients	Water for injections, EP	Water for injections, USP
Additional Information	pH 4.5 – 7.0 Osmolarity 308 mOsmol/L	pH 4.5 – 7.0 Osmolarity 308 mOsmol/L
Labelled Storage conditions	This medicinal product does not require any special storage conditions	Avoid excessive heat. Store at room temperature (25°C) Note: Brief exposure up to 40°C does not adversely affect the product. If stored at 2-8°C do not use after 30 days even if returned to room temperature. 8 to 25°C are ambient conditions.
	Both products may be stored at ambient temperatures	
Container type	Viaflo (polyolefin/polyamide co-extruded plastic). Rigid port. Supplied in an overwrap. 10 bags per box (approx. 10kg)	Viaflex (polyvinyl chloride, di-ethyl hexylphthalate). Soft port. Supplied in an overwrap. 14 bags per box (approx. 14 kg)
Expiry Date format	MM/YYYY eg. 09/2021 = end September 2021	MON/YY eg. FEB 20 = end February 2020
Admin. port closure	Twist off port protector (white colour) 	Pull off port protector (blue colour) 

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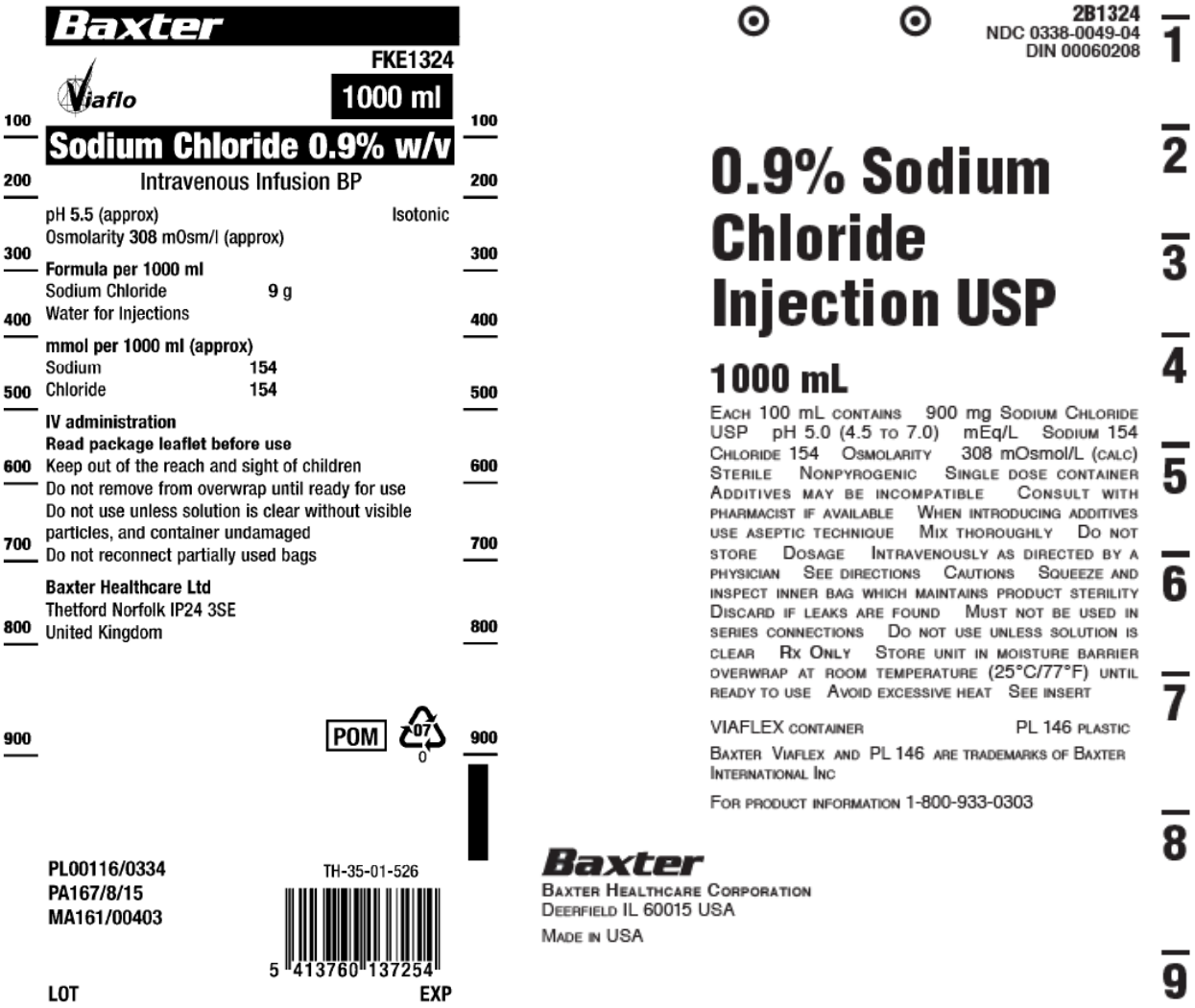
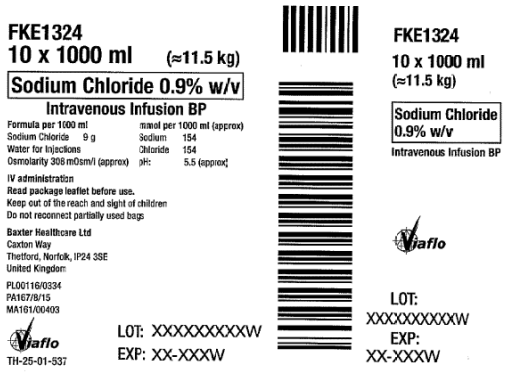
Bag Labels



Carton Labels



Attachment 2

0.9% Sodium Chloride for Injection USP

Frequently Asked Questions

What is the replacement product?

The replacement product is 0.9% Sodium Chloride USP 1000ml supplied in Viaflex containers. These are imported from the United States of America.

Is the replacement product licensed in the UK?

No. This product has been imported as an unlicensed product with the agreement of the MHRA on a temporary basis under The Human Medicines Regulations 2012 (SI 2012/1916). This product is licenced in the USA and is registered by Baxter under NDC-0338-0049-004, FDA NDA016677.

How can I tell that this product is not licensed in the UK?

All units of the unlicensed product carry the product code 2B1324 on the bag label and 2B1324X on the carton label and so can be easily identified. There is no UK licence number (PL number) on the labelling. The Delivery Note also shows the product code and batch/lot number.

What is the difference between 0.9% Sodium Chloride for Infusion and Injection?

The UK product is labelled as Sodium Chloride 0.9% Intravenous Infusion and the USA product is called Sodium Chloride Injection. These products are equivalent and this is a difference in terminology between the UK and the USA. Both products can be used for fluid replacement by intravenous administration.

What are the differences between the UK and USA products?

a) The bag label contains different information as highlighted in the comparison document (Attachment 1).

b) All Viaflex containers are made of polyvinyl chloride (PVC). The plasticiser used in the manufacture of the PVC is Di (2-ethylexyl) phthalate (DEHP).

c) The port apparatus on the imported bags is soft with a blue pull off port protector. The port apparatus on the UK bags are rigid with a white twist off port protector. Because of the differences in the rigidity of the ports, the optimum technique for inserting the administration set into the port may be different to your normal practice. A poster is available to provide guidance on set insertion technique and will be widely circulated. Please contact servicecs@baxter.com if you require additional copies.

Where is the bar code on the bag?

The bar code on the imported 0.9% Sodium Chloride for Injection, USP is printed in white and is located at 90° to the label on the upper left-hand side of the bag. This bar code may not be recognizable within the UK. Please handle and check the products by the bag label and not the bar code.

Are the imported bags of 0.9% Sodium Chloride USP latex free?

Baxter can confirm we do not use natural rubber latex components in the manufacture of products in the Viaflex containers.

Are the imported bags of 0.9% Sodium Chloride USP DEHP free?

No. The bags are manufactured from polyvinyl chloride (PVC). This is a hard plastic and di-ethlyhexyl phthalate (DEHP) is used as a plasticiser.

Can a standard set be used with the imported bags of 0.9% Sodium Chloride for Injection USP?

Yes. The port is designed to accept giving sets which conform the International Standard ISO/FDIS 8536-4 Infusion equipment for medical use.

Is the surface of the primary bag inside the overwrap sterile?

Baxter Viaflex bags are sealed within their over pouch and then terminally sterilised using steam. Therefore, both the primary container and it's over pouch are considered sterilised. However, we cannot guarantee that the outer surface of the primary container will still be sterile when you open the over pouch as the overpouch may have been compromised during transport, storage and handling. Care should be taken when handling the products to minimise the risk of damage and the potential for contamination of the surface of the inner bag.

How should the imported bags of 0.9% Sodium Chloride for Injection USP be stored?

Please follow the label on the bags. The bags should be stored inside the overwrap in the same manner as other IV fluids are currently stored. There are no additional requirements necessary.

We use 0.9% Sodium Chloride 1000ml for aseptic compounding. Can I store the imported bags in the fridge?

The Viaflex container may be stored at 2-8°C but should not be used after 30 days even if returned to room temperature. If this causes concern, please contact Baxter Customer service or your local account manager. Baxter Customer Services: Tel: 01635 206060.

Note that the compatibility, stability, sterility and shelf-life of any drug addition to 0.9% sodium chloride USP 1000ml in Viaflex containers should be determined locally using the professional judgement of a suitably qualified person on behalf of the Trust. The shelf-life determined locally should not exceed 30 days at 2-8°C.

The imported bags are cloudy ('blushing') and/or have marks or a pattern on them. Is this normal?

Yes. During the sterilization process it is possible for some water vapour to become trapped within the Viaflex material of the bag. This gives the appearance of either a cloudy or milky plastic. This appearance is called 'blushing' and is normal. Over time this water vapour leaves the matrix of the plastic and the bag material reverts to a clear plastic. The bag material often clears quickly when removed from the overwrap.
During the sterilization process, due to the high temperature and pressure it is possible for the bags to take an imprint of the tray they lie on. This imprint appears only on one side of the bag (the side in contact with the tray). This is normal and has no impact on the integrity of the bag and does not affect its contents

There is moisture present inside the over pouch. Is this normal?

Water vapor transmission through plastic films is a well-recognized phenomenon which is facilitated in those circumstances where there is a distinct gradient in relative humidity. Since Viaflex containers are filled with water containing solutions, a 100% relative humidity is always present in the solution container. Moisture can transfer through the vinyl material into the envelope space and condense as beadlets.

Since the outside environment has less than 100% humidity, molecules of water will always move from the inside of the Viaflex container to the outside. The amount which is transmitted through the walls of the container is not sufficient to affect the concentration of the solution.

When the integrity of the over pouch and Viaflex container has been confirmed as recommended with each use, i.e. there are not leaks, excess moisture can be explained by the phenomenon described above.

The 'grab handless' of the carton box have been activated or 'popped'. Is it ok to use the bags inside?

You may notice that the handles on some of the cartons have been used or 'popped'. This has occurred when the boxes were stacked onto Euro size pallets for distribution within the UK. The bags inside the cartons will be unaffected by the activation of the carton handles, which are designed to facilitate handling.

How does the carton open?

There are perforations on the top of the carton to indicate the intended opening method. The photo below shows a carton which has been correctly opened.

What is the Pallet Factor for 2B1324X?

The product is configured in Euro pallets. The pallet factor is 35 boxes per pallet, with 14 units per box. The total units per pallet is therefore 490 units.

Can I have a certificate of analysis?

Yes. Please e-mail your request to servicecs@baxter.com, including details of the batch number(s) you require the certificate(s) for.

When will the next delivery arrive?

For details about specific orders and deliveries please refer to the local Commercial Business Manager or Customer Services on 0800 0289 881.

Are the Medicines and Healthcare products Regulatory Agency (MHRA) and Department of Health & Social Care (DHSC) aware?

Baxter is working hard with the MHRA and the DHSC to ensure IV fluids continue to be supplied. The replacement product has been imported as an unlicensed product with the agreement of the MHRA on a temporary basis under The Human Medicines Regulations 2012 (SI 2012/1916). This product is registered by Baxter in the USA under NDC-0338-0049-004, NDA016677.

Where can I find more information?

For additional details regarding the use of the imported Viaflex bags of 0.9% Sodium Chloride USP please contact Baxter Medical Information.
Baxter Medical Information: https://mycustomercare.baxter.com

For details about supply please contact Baxter Customer service or your local account manager.
Baxter Customer Services: Tel: 01635 206060