



Healthcare GTIN Allocation Rules

GS1 Global Healthcare User Group

Compliments of:

Product Identification & Processing Systems, Inc. (PIPS)

GS1 US Solution Partner & Certified GS1 System Bar Code Consultants

*For expert guidance and implementation assistance with the
FDA Unique Device Identification Proposed Rule
please contact:*

**George Wright IV, Vice-President,
Consulting & Business Development
gw4@pips.com -- www.pips.com
Direct: +1 (212) 996-6076**

Document Summary

Document Item	Current Value
Document Title	Healthcare GTIN Allocation Rules GS1 Global Healthcare User Group
Date Last Modified	28 April 2011
Current Document Issue	7.00
Status	Final
Document Description	GTIN Allocation Rules for the Healthcare Sector



Note: This document is based on the *GS1 General Specifications Version 11 - Feb 2011*

PIPS Note: GS1 General Specifications Version 12 was published January 2012. Please contact PIPS for a complimentary copy.

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1. Scope and Background

Unique identification provides an opportunity to differentiate, in a machine readable form, an item's identification. Such information is rapidly becoming a pre-requisite, when linked with the item's batch number (or unique serial number) and expiration date, for traceability of all Healthcare products from production to delivery to the patient (point of care). This voluntary guideline was developed by the GS1 Healthcare User Group so that, when and where product identification is required there will be consistency in the use of a data structures worldwide. It also covers the specific Point of Sale requirements which are essential for Over The Counter healthcare items.

The GS1 Healthcare User Group is developing, promoting and implementing global industry standards for solutions to prevent medical errors, combat counterfeit products and improve supply chain efficiencies throughout the healthcare industry. The initial focus has primarily been on Pharmaceutical and Medical Devices and thus this document reflects the current engaged representation. While the principles and examples given may be applied to the entire healthcare sector, further development and updates to ensure that specific examples from animal health, dental products, etc may be added. Should a sector believe it is necessary to provide further input or additions to this document it should approach the GS1 Healthcare User Group to initiate these discussions.

 **Note:** The GS1 Healthcare User Group website (<http://www.gs1.org/healthcare>) is continuously updated.

2. Introduction to Global Trade Item Number in Healthcare

2.1. Definition of a GTIN

The Global Trade Item Number™ (GTIN™) is used for the unique identification of trade items worldwide. GTINs may be 8, 12, 13 or 14-digits in length. Their data structures require up to 14-digit fields, and all GTIN processing software should allow for 14 digits.

A trade item is any item (product or service) upon which there is a need to retrieve pre-defined information and that may be priced, or ordered, or invoiced at any point in any supply chain. This includes individual items as well as all their different configurations in different types of packaging.

2.1.1. GTINs in Healthcare

Global Trade Item Numbers (GTINs) uniquely identify items that are traded (Pharmaceuticals, Medical Devices, etc) in the Supply Chain. Integrity of these numbers throughout the item's lifetime is a key to maintaining uniqueness for manufacturers, wholesalers, distributors, hospitals, regulatory bodies and other Supply Chain stakeholders. A change to one aspect, characteristic, variant or formulation of a trade item may require the allocation of a new GTIN.

Brand Owners who hold the specifications of a healthcare item must properly allocate and maintain their GTINs to enable trading partners to distinguish products effectively for regulatory, Supply Chain and patient safety concerns.

This publication is based upon the GS1 GTIN Allocation Rules www.gs1.org/gtinrules and has been tailored to meet the specific needs of Healthcare. While all GS1 Standards are voluntary, the rules are intended to drive consistent implementation in the Global Healthcare Community.

- Note:** National, federal or local regulations may apply and will take precedence over this voluntary guideline. For example, some healthcare regulators may place requirements or restrictions on GTIN use within their jurisdiction.

2.1.2. Structure of a GTIN

Upon joining a GS1 Member Organisation companies receive a GS1 Company Prefix and full documentation on how to allocate GTINs to their products. The four methods to construct a GTIN are explained in detail the web site <http://www.gs1.org/productssolutions/idkeys>.

Although GTINs have an administrative structure to ensure that they are unique, they should be treated as non-significant numbers. This means that they should always be recorded and processed in their entirety; no part of the number relates to any classification or conveys any information.

- Note:** This GTIN format is used in business transactions, especially for eCom (e.g., electronic orders, invoices, price catalogues, etc.)

[Figure 2-1](#) shows the construct of the GTIN-13

Figure 2-1 Example of a GTIN-13

GS1 Company Prefix	Item Reference	Check Digit
$N_1 N_2 N_3 N_4 N_5 N_6 N_7 N_8 N_9$	$N_{10} N_{11} N_{12}$	N_{13}

GS1 Company Prefix

- The GS1 Company Prefix consists of a GS1 Prefix and the Company Number both of which are allocated by GS1 Member Organisations and form the GS1 Company Prefix. In general it comprises six to ten digits depending on the capacity needs of the company.
- The first two or three digits N_1, N_2, N_3 constitute the GS1 Prefix allocated by GS1 Global Office to each GS1 Member Organisation. It does not mean that the item is produced or distributed in the country to which the prefix has been allocated. The GS1 Company Number that follows the GS1 Prefix is allocated by the Member Organisation.

Item Reference

- The Item Reference is a component of the Global Trade Item Number (GTIN) assigned by the owner of the GS1 Company Prefix or U.P.C. Company Prefix to create a unique GTIN and is a non-significant number, which means that the individual digits in the number do not relate to any classification or convey any specific information. The simplest way to allocate Item References is sequentially, that is 000, 001, 002, 003, etc.

Check Digit

- The Check Digit is the last digit. It is calculated from all other digits in the GTIN.

Figure 2-2 Example of a GTIN-14

GTIN-14 Data Structure	Indicator	GTIN of the items contained (without Check Digit)	Check Digit
	N_1	$N_2 N_3 N_4 N_5 N_6 N_7 N_8 N_9 N_{10} N_{11} N_{12} N_{13}$	N_{14}

Indicator

- The Indicator is only used in the GTIN-14 Data Structure. It takes the value 1 to 8 (see Note 1 below) and is used for lower or higher packaging levels (See section 4.4, [Packaging Level](#)). The simplest way to allocate the indicator is sequentially that is 1, 2, 3... to each grouping of a trade unit.

A uniform grouping of trade items is a standard and stable grouping of identical trade items. The manufacturer or supplier has the option of either assigning a unique GTIN-13 or GTIN-12 to each grouping or assigning a unique GTIN-14 with an Indicator value of 1 to 8. These 14-digit GTINs incorporate the GTIN of the trade item (less its Check Digit) contained in each grouping. The Check Digit for each GTIN-14 is then recalculated.

The Indicators have no meaning. The digits do not have to be used in sequential order and some may not be used at all. The GTIN-14 structure for standard trade item groupings creates extra numbering capacity. Indicators can be re-used.

- ✔ **Note 1:** The value 9 is reserved for variable measure items. These are rare in Healthcare but an example could be gases used in operations. The amount of gas used for any given operation is variable but can be priced or ordered or invoiced in predefined quantities (e.g., cubic meters) when delivered to a hospital.

The Indicator is a digit with a value of 1 to 8. It is assigned as required by the company that constructs the identification number. It can provide up to eight separate GTIN-14 Identification Numbers to identify groupings of trade items.

The 8-, 12- or a 13-digit GTIN of the trade items contained must always be the one of the relevant levels of packaging contained, usually the lowest level. GTINs for restricted distribution must not be used in this Element String.

2.2. Healthcare Items (definitions)

The legal definitions for healthcare items will differ from one country to another (see Section 3, Regulators). Indeed some legal definitions for drugs are simply 'A substance recognised by an official legal entity'. This section therefore aims to provide a global overview.

2.2.1. Pharmaceutical Products

2.2.1.1. Over the Counter (OTC)

An OTC is a pharmaceutical product, drug, or medicinal specialty whose dispensing or administration does not require medical authorization. Normally it can be used by the consumers under their own initiative and responsibility to prevent, relieve or to treat symptoms or mild diseases. Its use, in the form, conditions and authorized dosages should be safe for the consumer.

This covers healthcare items, pharmaceutical, and medical devices that do not require a medical prescription or direct medical intervention. Typical examples include bandages, first-aid kits, mouthwash, low-strength pain-killers, etc.

2.2.1.2. Medical Prescription (Rx)

A Medical Prescription (often referred to as a Pharmaceutical) Product (Rx) is a drug or medicinal specialty that requires a medical prescription or direct medical intervention. Typical examples include, medicated bandages, pain medication, injectables etc and can normally only be obtained with a prescription from an appropriate health care practitioner.

2.2.1.3 Hospital Pharmacy Production

A Hospital Pharmacy Product is a product that has to be manufactured by a hospital pharmacy for internal or multi-hospital use, thus it is not (or is no more) marketed by pharmaceutical company that supplied the raw material. These products may correspond to the Rx or OTC category. In any case, they have to be clearly identified from the production to the bedside.

2.2.2. Medical Devices

Medical device means any instrument, apparatus, implement, machine, appliance, implant, in vitro reagent or calibrator, software, material or other similar or related article, intended by the manufacturer to be used, alone or in combination, for human beings for one or more of the specific purposes of:

- diagnosis, prevention, monitoring, treatment or alleviation of disease
- diagnosis, monitoring, treatment, alleviation of or compensation for an injury
- investigation, replacement, modification, or support of the anatomy or of a physiological process
- supporting or sustaining life
- control of conception
- disinfection of medical devices
- providing information for medical purposes by means of in vitro examination of specimens derived from the human body and which does not achieve its primary intended action in or on the human body by pharmacological, immunological or metabolic means, but which may be assisted in its function by such means.

2.3. Data Requirements in Healthcare

2.3.1. Global Trade Item Number (GTIN)

By joining a GS1 Member Organisation the company receives a GS1 Company Prefix which gives the company the ability to create GTINs and access to the GS1 Standards. The GS1 System is designed to be used in any industry or any part of the public sector so that an individual company can select to allocate GTINs using a GS1 Company Prefix from the GS1 Member Organisation of their choice. However, some Regulators impose mandatory local requirements on the use of GTIN within their jurisdiction (see 3, Regulators).

Attributes such as Batch Number, Expiration Date, Serial Number, etc. add value to the product when combined with the GTIN in a GS1 bar code using the GS1 Application Identifiers. Their use enables tracking & tracing systems and can contribute to improving patient safety. For more information see the general guidelines <http://www.gs1.org/healthcare>.

Within the GS1 System the following attributes may only be used in association with a GTIN.

2.3.1.1. Batch Number

A Batch Number (Application Identifier (10)) is typically assigned at the point of manufacturer using, for example, a production lot number, a shift number, a machine number, a time, or an internal production code. The data is alphanumeric and length is variable up to 20 alphanumeric characters.

2.3.1.2. Expiration Date

An Expiration Date (Application Identifier (17)) is often referred to as expiry date or maximum durability date and indicates the limit of consumption or use of a product (e.g., for pharmaceutical products it will indicate the possibility of an indirect health risk resulting from the ineffectiveness of the product after the date). It is always encoded as a fixed length six numeric characters with the structure YYMMDD where:

- YY = the tens and units of the year (e.g., 2003 = 03).
- MM = the number of the month (e.g., January = 01).
- DD = the number of the day of the relevant month (e.g., second day = 02).

An Expiration Date and Time may also be expressed (Application Identifier (7003)). This structure is only used when the exact expiration time is critical to patient safety.

2.3.2. Serial Number

A Serial Number (Application Identifier (21)) is typically used on medical devices that need to be individually tracked and traced (e.g., wheel chairs, pacemakers, MRI scanners).

3. Regulators

The healthcare industry is highly regulated and companies are required to comply with national, federal and/or local regulations.

This guideline has been developed as a global standard to help companies meet the key requirement of Product Identification (also an enabler for encoding batch and expiration date). The broader GS1 Global Healthcare User Group has a regulatory affairs area on the website (see <http://www.gs1.org/healthcare>). The GS1 Healthcare User Group advocates the use of global standardisation to aid compliance to the regulatory requirements of *all* countries. However, it must be stressed that national, federal or local regulations may apply and take precedence over any GS1 Standard.

4. Allocating the Numbers

4.1. General Rule

A Global Trade Item Number (GTIN) is used to identify any item upon which there is a need to retrieve pre-defined information and that may be **priced** or **ordered** or **invoiced** at any point in any Supply Chain. Typically this includes the lowest level of packaging as well as higher packaging levels.

A separate unique GTIN is required whenever any of the pre-defined characteristics of an item are different in any way that is relevant to the trading process. This principle is demonstrated in the figure below where the two products have identical ingredients and brand names but require separate GTINs as one product can be sold anywhere while the other requires a Pharmacist to distribute (because of the intended usage).

Figure 4-1 Example of product change triggering a New GTIN be allocated



The guiding principle is if any **significant change** is made and it is expected to distinguish a new trade item from an old trade item and use accordingly, a new GTIN should be assigned. This document aims to define global what is meant by **significant change** in Healthcare by way of practical examples.

4.2. Responsibility

4.2.1. Branded Items

The Brand Owner, the organisation that owns the specifications of the trade item regardless of where and by whom it is manufactured, is responsible for the allocation of the Global Trade Item Number (GTIN). By joining a GS1 Member Organisation, the company receives a GS1 Company Prefix which

is for the sole use of the company to which it is assigned. The GS1 Company Prefix may not be sold, leased or given, in whole or in part, for use by any other company.

The Company that owns the product and makes the Regulatory Filing is responsible for the GTIN Allocation. For Healthcare items it is common for national regulators to require the submission of a product filing from a legal entity based within the jurisdiction of the regulator. Such arrangements have no direct impact on GTIN Allocation but need to be covered by the normal contractual arrangements (e.g., licensed distributor, subsidiary, reseller, etc.).

The Brand Owner can only be responsible for GTIN Allocation until the item leaves their control. For example a complex medical device can be reconfigured (e.g., new language, updated software, etc). Individual customer configuration therefore can not impact GTIN Allocation.

4.3. Guidelines for Allocating Global Trade Item Numbers

4.3.1. Pre-Defined Characteristics

Although this list is not exhaustive, the basic pre-defined characteristics of a trade item are:

- Product Name, Product Brand, and Product Description
- Formulation (active ingredients)
- Strength
- Dosage (or usage)
- Net quantity (weight, volume, or other dimension impacting trade)
- Packaging configuration
- Form, Fit or Function
- For groupings, the number of elementary items contained, and their subdivision in sub-packaging units, the nature of the grouping (carton, pallet, box-pallet, flat-pallet...)

A modification to any of the basic elements that characterise a trade item will usually lead to a change in the GTIN.

4.3.2. Lead time in Re-Using a GTIN

A GTIN allocated to a trade item that has become obsolete must not be re-used for another trade item until at least 48 months have elapsed:

- after the expiration date of the last original trade items produced with that number
or,
- where there is no expiration date, after the last original trade items produced with that number have been supplied to the customer.

Brand Owners should consider a longer period depending upon the type of goods and/or any regulatory framework.. Prescription drugs, implants, and other high risk items. require steps to be taken by the assigning company to ensure that the issued GTINs are not reallocated for a period well beyond the lifetime of the product or beyond the end of treatment to facilitate the integrity of statistical analysis or service records.

4.3.3. Prepriced Merchandise

Prepricing is discouraged as a trade practice as it introduces complexity for trade item file maintenance through the Supply Chain. However, prepricing can be a mandatory requirement from

the regulatory authorities therefore if the price that the consumer will pay is marked on the item, the Global Trade Item Number (GTIN) should be changed when the price marked on the item changes.

4.3.4. Trade Item Changes

Trade item changes are any change or improvement during the life of a trade item where the new trade item replaces the old one. Should the Brand Owner decide to create a variant (e.g., with different active ingredient) in parallel with the standard trade item, then a separate GTIN has to be allocated.

Minor trade item changes or improvements **do not** require the allocation of a different GTIN. Examples: artwork colour changes, outer packaging material change, etc.

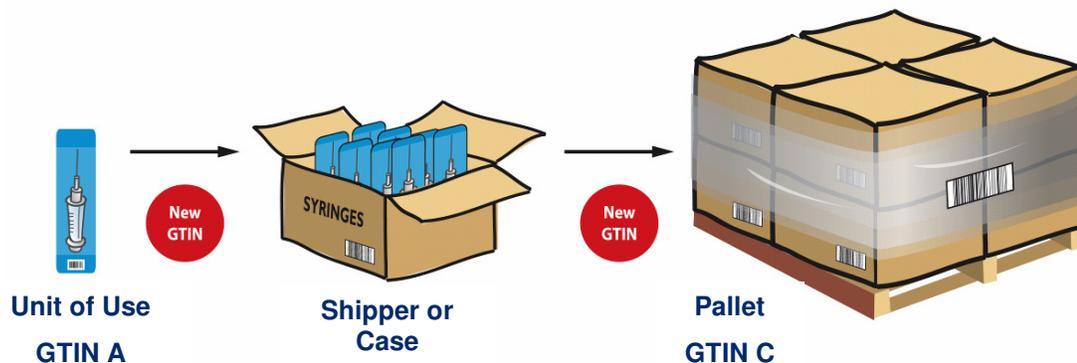
Major trade item changes or improvements **do** require the allocation of a different GTIN. Examples: If a trade item's quantity or measure changes or if **any pre-defined characteristics** are modified, then a new GTIN must be allocated.

4.4. Packaging Level

It is important that a different packaging level (e.g., Unit of Use Package, Shipper or Case, Pallet, etc) be assigned a different GTIN. Although it is for the Brand Owner to determine the exact level(s) to which a GTIN should be assigned typically any packaging level that is **priced** or **ordered** or **invoiced** at any point in any Supply Chain should receive its own GTIN.

<http://www.gs1.org/productsolutions/idkeys> provides detailed examples and a typical packaging level example is shown in [Figure 4-2](#).

Figure 4-2 Example of a Typical Packaging Level



✓ **Note:** While the packaging level does not impact the GTIN of a specific item, each different grouping of the same item requires a separate GTIN.

4.5. Takeovers

4.5.1. Acquisitions and Mergers

For the company being acquired, existing stocks on hand which are numbered before the acquisition or merger, keep the same Global Trade Item Numbers (GTINs). Products that are produced after the acquisition or merger may keep the GTIN allocated before the acquisition if the acquiring company maintains the GS1 Member Organisation membership.

A merger implies that a legal entity has taken over a company and has assumed responsibility for the company's GS1 Company Prefix, as well as, their assets and locations. Products that the company produced under its GS1 Company Prefix can still be produced using the same prefix after the merger,

as full responsibility for the GS1 Company Prefix is unaffected. If it so desires, the new company can label all acquired products using only one of their existing GS1 Company Prefix.

The importance of ensuring trading partners are informed of any changes, in a timely manner, cannot be overemphasised. A company should be careful when centralising the allocation of all numbers under one GS1 Company Prefix, thus changing the GTIN of the existing products, which are otherwise unchanged. Centralising the allocation of all numbers under a single GS1 Company Prefix should be an exception, as it results in additional work and data file maintenance for customers. Companies should notify their GS1 Member Organisation of any legal status change, within one year, to facilitate a smooth transition.

4.5.2. Partial Purchase

If a company purchases a division of a company whose GS1 Company Prefix is used in divisions not purchased, then the acquiring company must change the GTINs for products in the purchased division within one year.

In most cases the rules concerning the use of the seller's GTINs, and other GS1 Identification Keys, should be taken into consideration when drawing up the purchase contract.

At the earliest opportunity, the buyer should phase in new numbers, from its own range of numbers, for items whose brand name it has acquired. The buyer will be able to do this, for example, when packaging is redesigned or reprinted.

Best practice in healthcare is that the selling company never reallocate the numbers used on products which are divested to another company.

4.5.3. Split or Spin-Off

When a company splits into two or more separate companies it is necessary for each GS1 Company Prefix assigned to the original company to be transferred to only one of the new companies. Any company left without a GS1 Company Prefix will need to apply to a GS1 Member Organisation to obtain one. The decision about which of the new companies should take the original GS1 Company Prefixes should be made in such a way as to minimise the number of additional GTINs required. The decision should be part of the legal arrangements of the new companies.

It is not necessary for existing stocks of items to be renumbered. However, when any of the split or spin-off companies has trade items that are numbered with a GS1 Company Prefix that it no longer holds the company should renumber those items using its own GS1 Company Prefix when new labelling or packaging is produced. Customers should be notified well in advance of the changes.

Split or spin-off companies that retain a GS1 Company Prefix must keep a record of the GTINs created that have been allocated to items they no longer own. Best practice in healthcare is to never reallocate the numbers used on products which are divested to another company.

4.6. Data alignment

When a new GTIN is assigned to a trade item, it is essential that the Brand Owner provide the detailed information to trading partners about the item's characteristics (see Section [4.3.1, Pre-Defined Characteristics](#)). It is essential that the information associated with a GTIN is accurate and communicated in a timely manner.

4.6.1. Data Alignment Best Practice

A number of actions are vital to ensure that GTINs are accurately communicated within the Supply Chain. These actions ensure that the data associated with any scanned bar code can be associated with accurate, up-to-date, data. This is particularly essential for items scanned in Healthcare Supply

Chains where the absence of accurate data may have safety, product availability and/or regulatory conformance implications.

The GTIN provides a Supply Chain solution for the identification of any item and overall Supply Chain costs are minimised by all partners in the Supply Chain adhering to identical allocation rules as laid down in this publication.

5. GTIN Allocation Scenarios

5.1. Over the Counter (OTC)

5.1.1. General Rules and Over the Counter (OTC)

Although regulations (see Section 3, Regulators) are extremely important in this area, most Over The Counter items follow broadly similar allocation rules to those in the general retail environment (see www.gs1.org/gtinrules). The examples below focus on major Healthcare specific scenarios not found within the general retail environment.

There is a clear overlap between Over The Counter products and both Medical Devices and Medical Prescription (Rx) drugs. The general principles in this section apply to any type of Healthcare Item.

5.1.2. Different Language or Target Market

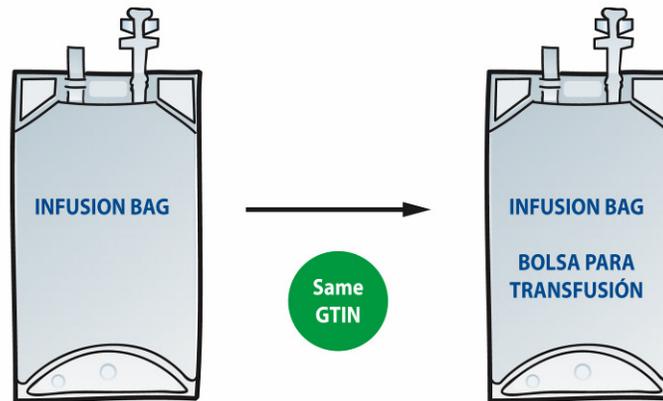
[Figure 5-1](#) shows two otherwise identical products - one targeted for an English speaking country, the other for a Spanish speaking country. As the two items exist in parallel and can not be substituted (due to market acceptance and local labelling laws) a new language version to be sold in one Market/Country requires a different GTIN than the other that is sold in a different Market/Country.

Figure 5-1 New GTIN



5.1.3. Additional Language on the Packaging Sold in Several Markets

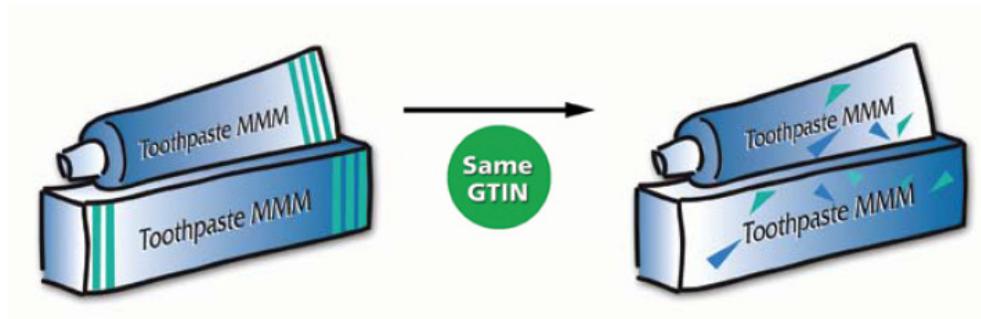
Unlike the single language packaging (see Section 5.1.2, [Different Language or Target Market](#)) many products are packed for multiple countries and markets. Where there is an addition to an existing language cluster, the GTIN will remain the same.

Figure 5-2 Addition to an Existing Language Cluster - Same GTIN

5.1.4. Changes in packaging materials or minor artwork changes

Minor artwork changes, or a minor change in packaging materials do not require the allocation of different GTINs.

Typically the gross dimensions of a trade item communicated via the Item File that do not affect net trade item quantity or measure do not impact the GTIN assignment. If dimensions are relevant anywhere in the supply chain, the general rule is that if any gross dimension (e.g. length, depth, weight, etc) changes by more than 20% a new GTIN is required. Changes below 20% may require a new GTIN at the discretion of the brand owner.

Figure 5-3 Minor Change in Packaging Materials - Same GTIN

- ✓ **Note:** Minor changes - those which are not relevant to trading partners because they do not impact the information concerning the exchange of products - do not require a change of GTIN.

5.1.5. Promotions

Promotions are normally short-term modifications to the way the item is presented. Promotions related to price do not impact GTIN allocation.

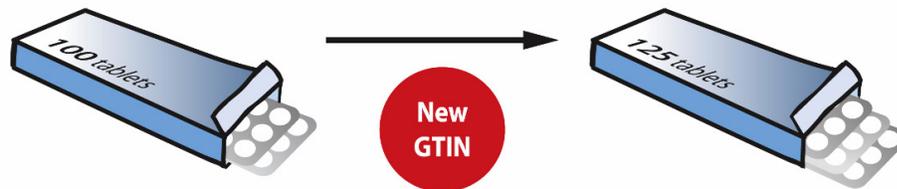
Figure 5-4 Promotions Related to Price - Same GTIN

- ✓ **Note:** Any promotion impacting the content of the product, or requiring a new Regulatory Filing, is considered a major change and a new GTIN must be assigned.

5.1.6. Declared Change in Net Content

Any modification which leads to a declared change in the net content of a healthcare item requires a new GTIN to be assigned. Examples include: number of tablets in a package; the number of sterile wipes in a pack; the net volume of 400 grams in 4 helpings of 100 grams (for adult use) changed to 400 grams in 8 helpings of 50 grams (for a child), etc.

Figure 5-5 Declared Change in Net Content - New GTIN



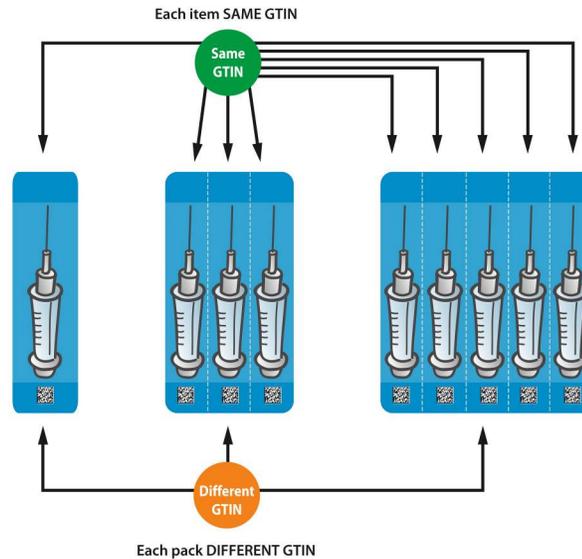
Information systems need to distinguish between old and new healthcare items where there is a declared change in net content. Failure to distinguish old and new could lead to medical error and/or inaccurate unit pricing.

- ✓ **Note:** Improvements in manufacturing tolerances, that do not impact the declaration on the product in any way, do not require a GTIN change as the modification is only relevant to the manufacturer.

5.1.7. Groupings of same item containing different quantities

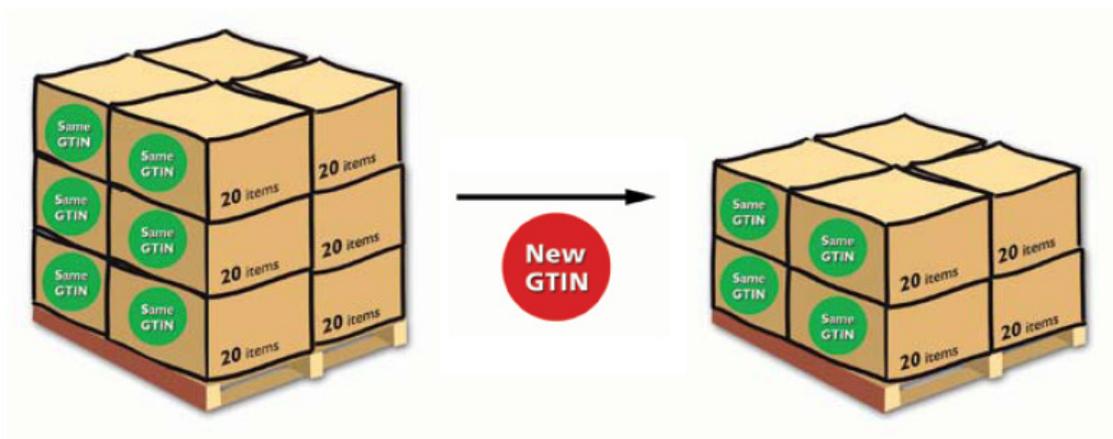
It is essential that each different packaging level (e.g., Unit of Use, Shipper, Case, etc) be assigned a different Global Trade Item Number (GTIN). The example below shows otherwise identical syringes in packs of one, three and five:

- The GTIN for each individual item is the same independent of any lower or higher packing levels or use as part of a larger Healthcare Kit (See section [\(5.3.5, Kits \(Combinations of Independent Items each with a Separate GTIN\)\)](#))
- Each grouping (the pack of one, three and five below) requires a separate GTIN.

Figure 5-6 Groupings of the same item containing different quantities


5.1.8. New/additional pallet layouts that co-exist permanently with the original layout

The pallet-layout does not impact GTIN allocation of items on the pallet (see section [5.1.7, Groupings of same item containing different quantities](#)) and a GTIN is not normally required at the pallet level. However, if the market requires additional pallet configurations to be made available for ordering purposes, then different GTINs are required for each pallet-pattern and/or pallet-layout.

Figure 5-7 Additional Pallet Configurations for Ordering Purposes - New GTIN


5.2. Medical Prescription (Rx)

5.2.1. General Rules for Medical Prescription (Rx) drugs

As with the General Rules that apply to all Healthcare Items (see section [4.1, General Rule](#)), compliance to regulatory requirements always takes precedence (see section [3, Regulators](#)). The additional general rules that apply specifically to the Medical Prescription (Rx) are:

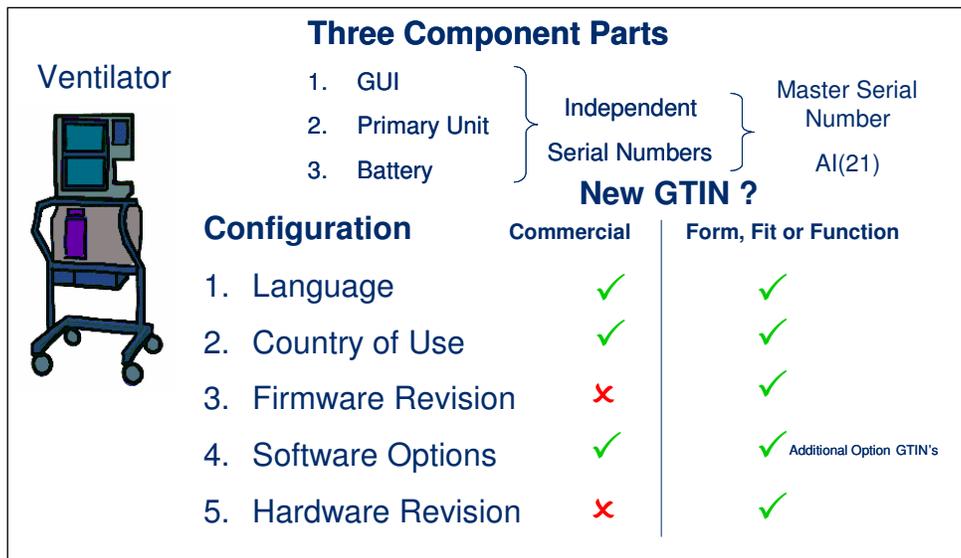
- Any change to the Regulatory Filing of a product (for example triggered by a formulation, usage, concentration/potency, etc. change) will lead to new GTIN.
- In addition to the product identification (GTIN), Batch Number and Expiration Date are normally required in bar code form.
- In the case where a Medical Prescription (Rx) Product is made-up specifically for an individual patient (for example in a hospital pharmacy) the normal GTIN rules may not be applicable. For these specialist 'one-off' preparations, it is suggested to bar code and number the product so that it is uniquely attributed to the individual patient.

5.3. Medical Devices

5.3.1. General Rules for Medical Devices

The General Rules (see Section [4.1, General Rule](#)) and the regulatory requirements (see Section 3, Regulators) apply to all Healthcare Items. In addition the complexity of the Medical Device market needs to be recognised. The illustrated example below showing a Ventilator made up of three component parts Global User Interface (GUI), Primary Unit & Battery. Each of these items could be ordered separately and may be configured for local requirements like language, electricity plugs, software, etc.

Figure 5-8 Example of the complexity of a Medical Device product with regard to GTIN Allocation



A key consideration for GTIN Allocation is the commercialisation of the product (e.g., is the Medical Device considered different for pricing or ordering or invoicing). If the product is 'different' a 'different GTIN' is required.

The diagram above is a scenario to represent the difficulties in determining when a GTIN change is necessary for complex medical devices, depending upon how the device is viewed i.e. from a Commercial and / or Form, Fit, Function perspective. Nominally the commercial aspects of an FMCG trade item determine a GTIN change, the objective is to recognise that other important factors reside which may not necessarily signify a commercialization shift, but would impact the GTIN assignment for Healthcare. It is the brand owner's responsibility to manage appropriately the configuration of any complex device and its appropriate GTIN(s) assignment up to the point of sale. The example shows major hardware components managed by GTIN and Serial Number combinations, recognising that within this complex medical device there are other potential parameters where configuration change must be managed; GTIN change may be dictated based on the manufacturers change management process.

Many Medical Devices, particularly high-value electronic equipment, will use the combination of GTIN plus Serial Number for tracking purposes (rather than the GTIN, Batch Number and Expiration Date which are normally required in other areas of Healthcare). It is the Brand Owner that decides upon the identification requirement.

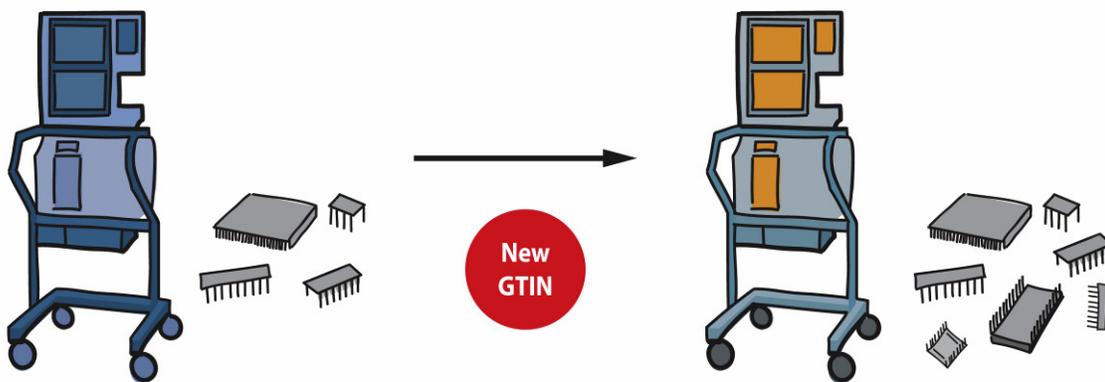
5.3.2. Minor Software Configuration Change

A minor change in software configuration, which is provided on a non-commercial basis and has no impact on the function of the device, has no impact on GTIN Allocation. Examples include bug fixes, language options (provided for free), minor version updates, etc.

5.3.3. Major Software Configuration Change

A major change in software configuration that adds to, or changes, the functionality requires the two configurations to be distinguishable through the allocation of different GTINs. Such changes would normally be provided on a commercial basis and trading partners need to distinguish the two configurations for pricing or ordering or invoicing. Additional examples include software updates that provide additional product features, or significant version updates.

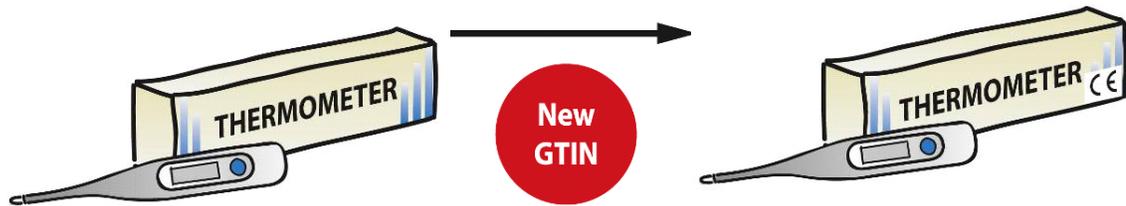
Figure 5-9 Major Software Configuration Change – New GTIN



5.3.4. Inclusion of a Certification Mark

Within the Healthcare sector there are many examples of certification marks. A certification mark is a symbol, logo or wording on a product that declares conformance to a regulated set of criteria (e.g., European Certification Mark CE). When a product is changed to include a certification mark (which was not previously shown on the packaging or product itself) a new GTIN should be allocated for markets where the certification mark is of particular relevance. It is a key principle of GTIN Allocation that the GTIN identifies uniquely the product and its packaging configuration.

Figure 5-10 Inclusion of a Certification Mark – New GTIN



- ✔ **Note:** Brand owners are responsible for internal control of their inventory and any return systems. It is important that such systems, as well as phase-in & phase-out logistic management, can distinguish between 'old' and 'new' product. When this can be effectively achieved, for example using the batch number or product variant, there is no need to allocate a new GTIN in the scenario above. It should also be noted that when a certification mark is added to enable sales in a new country/market it has no impact on countries/markets where the product was previously sold – in this case there is no need to allocate a new GTIN in the scenario above.

5.3.5. Kits (Combinations of Independent Items each with a Separate GTIN)

A medical kit can be defined as any combination of items that form a standard and stable grouping that can be individually priced or ordered or invoiced; the Brand Owner is responsible for GTIN Allocation. When a kit contains items from multiple manufactures the GTIN (and normally any Regulatory Filing) requirements for the kit is the responsibility of the organisation that creates the kit.

- ✔ **Note:** Kits may contain Medical Prescription (Rx) products (see [5.2, Medical Prescription \(Rx\)](#)).

Some typical examples of kits are groupings of items required to perform a given medical intervention. The three examples shown below demonstrate major and minor changes which impact GTIN Allocation in different ways. The key principles are the commercialisation of the product (e.g., different for pricing or ordering or invoicing?) and the function (e.g., changes the intended usage?):

Figure 5-11 Major Change to a kit – additional item impacts commercialisation and function.

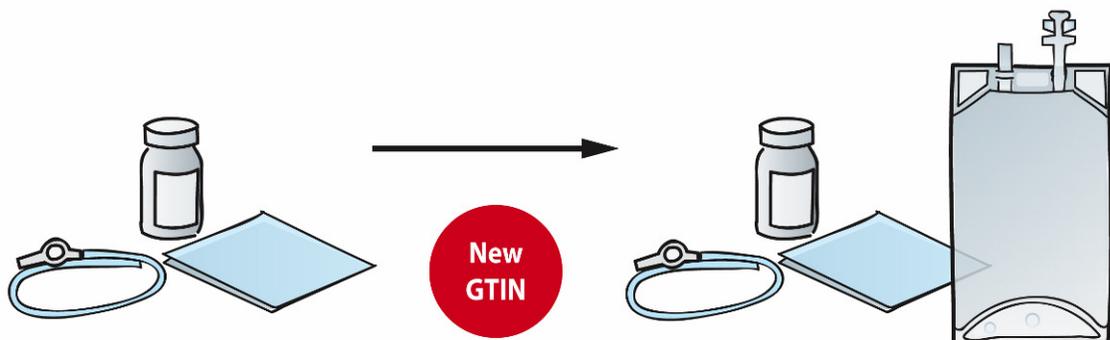
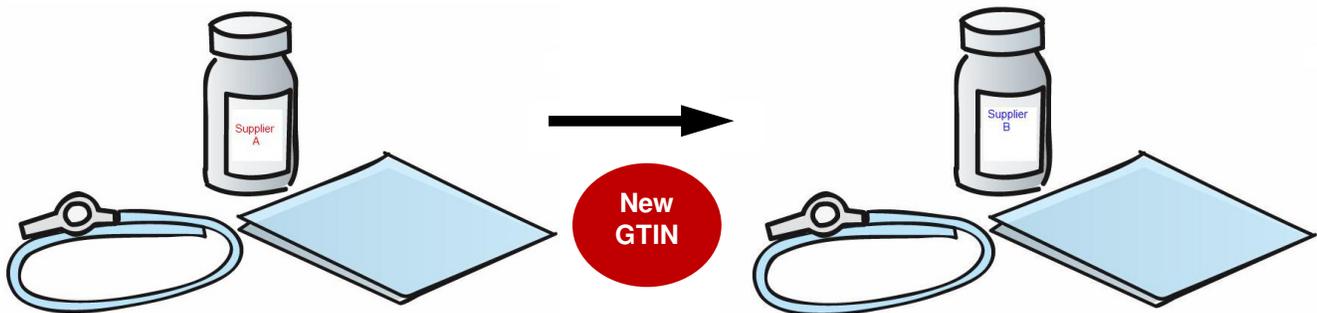
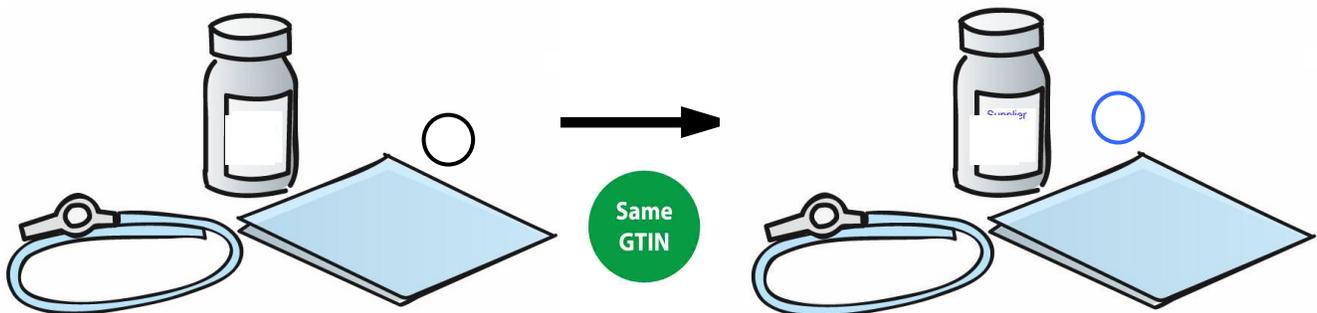


Figure 5-12 GTIN change within a kit, Sterile Water component of the kit changed (bottle of sterile water has a GTIN), a new GTIN is assigned to the kit



- ✔ **Note:** The items within the kits may have their own GTINs. A change to any GTIN within the kit will require a change to the GTIN of the kit itself.

Figure 5-13 Minor Change to a kit by Brand Owner – cotton ball component of the kit changed with no impact on commercialisation, net content or function



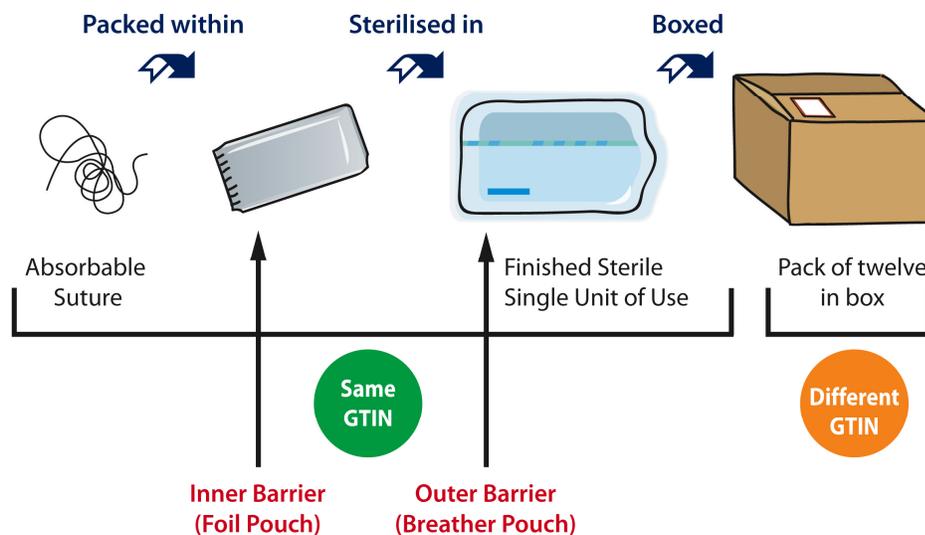
- ✔ **Note:** If a Brand Owner changes an item within a kit and the item doesn't have a GTIN, the Brand Owner doesn't have to change the GTIN of the kit.

5.3.6. Barrier Packs (Sterile Packaging)

As outlined in section 4.4, [Packaging Level](#) the general rule is that each packaging level requires a separate GTIN. However, for certain items, particularly sterile items, the multiple barrier packaging is not considered a Packaging Level for GTIN Allocation.

The example below shows a typical product where the sterilisation requires several packaging levels (double barrier packaging). When the suture is used certain packaging levels may only be opened in a sterile environment, however, the same GTIN is used for the item and the 'sterile' barrier package level as the key principles for GTIN Allocation are the commercialisation of the product (e.g., different for pricing or ordering or invoicing?) and the function (e.g., changes the intended usage?) and the sterile packaging levels have no impact on commercialisation or function.

Figure 5-14 Barrier Packs (Sterile packaging)



A. Glossary of Terms

Term	Definition
Application Identifier	The field of two or more characters at the beginning of an Element String that uniquely defines its format and meaning.
Brand Owner	The party that is responsible for allocating GS1 System numbering and bar code symbols on a given trade item. The administrator of a GS1 Company Prefix.
GS1 Company Prefix	Part of the GS1 System identification number consisting of a GS1 Prefix and a Company Number, both of which are allocated by GS1 Member Organisations.
EPC	Electronic Product Code is an identification scheme for universally identifying physical objects via RFID tags and other means. See http://www.epcglobalinc.org
GS1 General Specifications	Defines the GS1 System data and application standards related to the marking and automatic identification of trade items, locations, logistic units, assets, and more using bar code, RFID, and GS1 Identification Keys.
GS1 Global Office	Based in Brussels, Belgium, and Princeton, USA, is an organisation of GS1 Member Organisations that manages the GS1 System.
GS1 Member Organisation	A member of GS1 that is responsible for administering the GS1 System in its country (or assigned area). This task includes, but is not restricted to, ensuring user companies make correct use of the GS1 System, have access to education, training, promotion and implementation support and have access to play an active role in GSMP.
GS1 System	The specifications, standards, and guidelines administered by GS1.
GTIN	Global Trade Item Number used to identify any item (product or service) upon which there is a need to retrieve pre-defined information and that may be priced, or ordered, or invoiced at any point in any Supply Chain.
Item Reference	The part of the data structure allocated by the user to identify a trade item for a given GS1 Company Prefix.
Medical Device	Any instrument, apparatus, implement, machine, appliance, implant, in vitro reagent or calibrator, software, material or other similar or related article, intended by the manufacturer to be used, alone or in combination, for human beings for any medical purpose.
Over The Counter (OTC)	A drug, or medicinal specialty whose dispensing or administration does not require medical authorization, and it can be used by the consumers under their own initiative and responsibility to prevent, relieve or to treat symptoms or mild diseases and that its use, in the form, conditions and authorized dosages are safe for the consumer.
Rx (Medical Prescription Product)	A drug or medicinal specialty that requires a medical prescription or direct medical intervention. Typical examples include, medicated bandages, pain medication, injectables etc and can normally only be obtained with a prescription from an appropriate health care practitioner.

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With special thanks to:



Blue Tower
Avenue Louise 326, b10
BE 1050 Brussels
Belgium
T +32 (0)2 788 7800
F +32 (0)2 788 7899
www.gs1.org