

Summary Report for Importation of Unlicensed Medicines

01 April 2010 – 30 June 2010

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PUBLIC DOMAIN DATA

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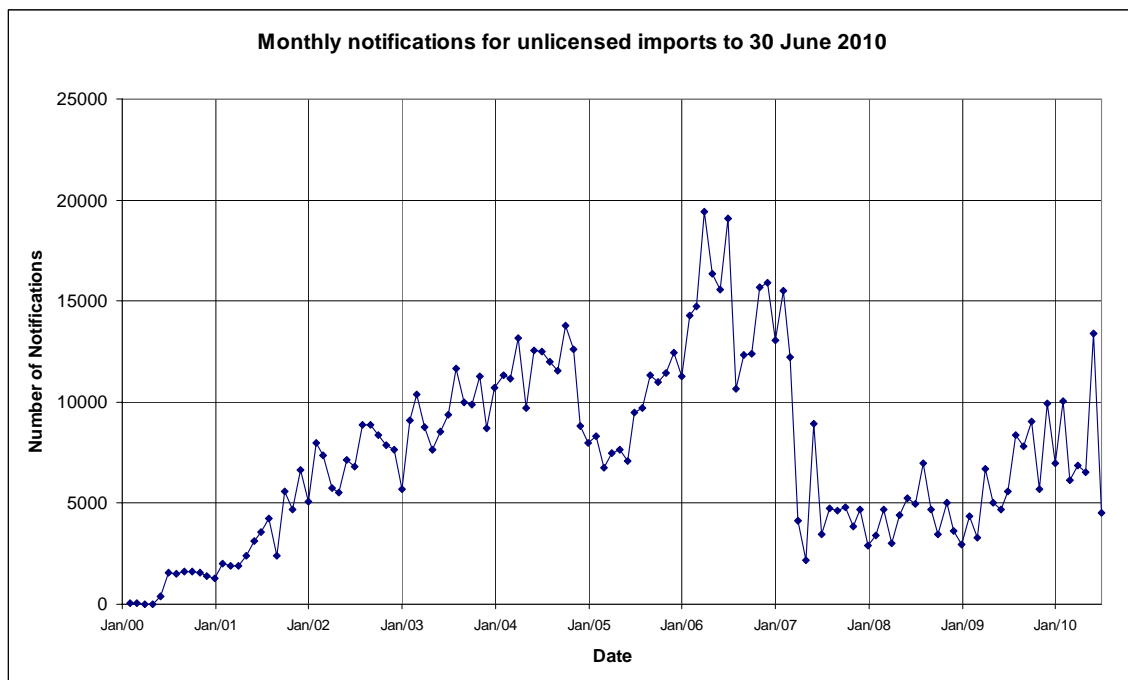
1 Introduction

This report provides a review of the Import Notification System (INS) up to the end of June 2010. Appendix I provides a risk hierarchy that may be found useful in optimising quality and minimising risk when using unlicensed medicines.

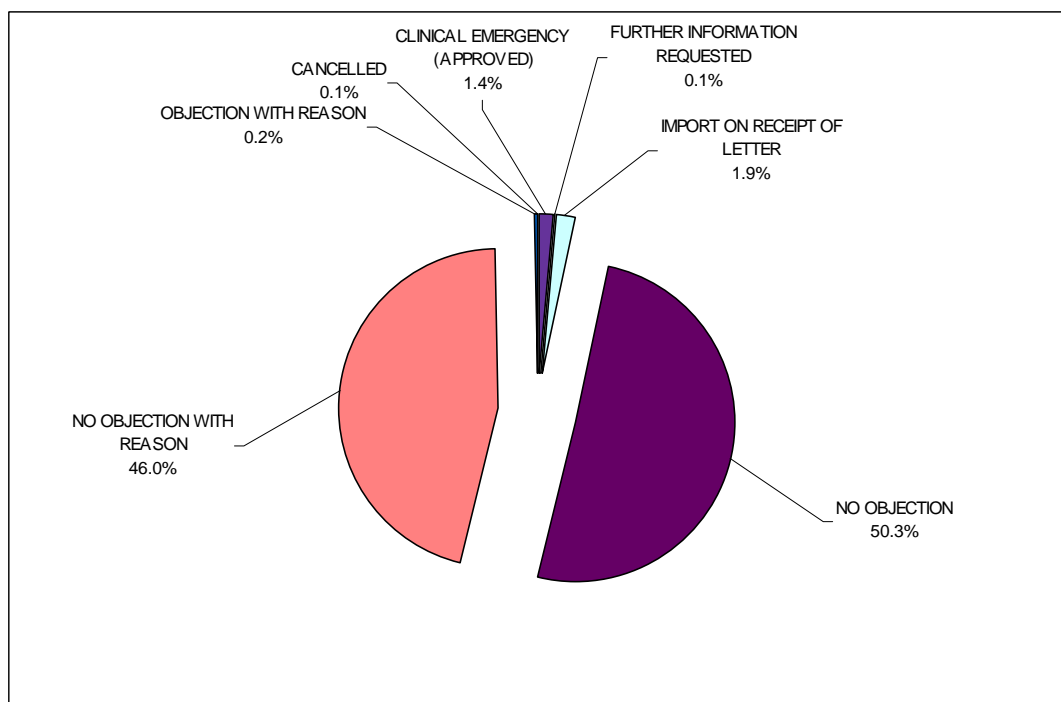
2 Notifications for importation

Graph 1 Monthly notifications for unlicensed imports

Note: Includes cancellations and invalid database entries



Graph 2 Breakdown of notifications by status, 01 Apr – 30 Jun 2010



2.1 Countries of export of products

Table 1 Breakdown of valid notifications by country, 01 Apr – 30 Jun 2010

Rank	Exporting Country	Number of Notifications
EEA		12950
Non-EEA		11502
Total		24452

2.2 Most frequently notified products

Table 2 lists the 50 most frequently notified products during Q2 2010 in rank order. The data are for valid notifications only and do not include cancellations or incomplete notifications. The listing includes notifications which may not be intended for placing on the UK market. It includes both acceptable products and those to which objections to import have been raised. It is therefore not an indicator of product acceptability.

Considering the top 10 of these products:

1. Co-Proxamol Tablets. Following cancellation of UK Co-Proxamol licences at the end of 2007, there are some prescribers who continue to need this product where no licensed alternative can be found. Prescribers should be aware, however, that the EMEA has on 29-Jun-2009 recommended withdrawal of Co-Proxamol licences throughout the EU. At present, unlicensed product continues to be available in the UK and no objections have been raised to valid import notifications.
2. Glyceryl Trinitrate buccal/sublingual preparations. Used for cardiac indications, these are preparations with no direct licensed equivalents available in the UK or are for use outside the UK. After consideration of the regulations, MHRA Regulatory Advice Unit have decided that Glyceryl Trinitrate preparations intended for emergency stock in life rafts do not fall under Schedule 1 to the Marketing regulations, SI 1994/2789 and from April 2010 do not require notification of intent to import under SI 2005/2789.
3. Vitamins (Oral & Topical). Vitamin Oral & Topical Preparations. Many of these are probably “lifestyle” products and used as general supplements or for skincare. It is almost impossible to check whether there are UK equivalents.
4. Acetylcysteine Oral Preparations. These are products with no UK licensed equivalents.
5. Dapoxetine 30 mg Tablets. Erectile dysfunction treatment not licensed in the UK.
6. Patent Blue V 2.5% Solution is injected subcutaneously to colour lymph vessels so that they can be injected with a contrast medium. There is no UK licensed product currently available.
7. Thioridazine 50 & 100 mg Tablets. Antipsychotic. There are safety concerns with respect to cardiotoxicity and retinopathy. Novartis discontinued all Melleril preparations worldwide on June 30, 2005. The company recommended that the drug is discontinued in any patients currently receiving the drug and patients switched to an alternative medication if necessary. No new treatment with thioridazine should be initiated.

8. Melatonin products. These are used for attention deficit disorder, sleep disturbances and treatment of jet lag. Melatonin products are regarded as supplements in the USA and may not meet normal pharmaceutical standards of GMP. Appropriate warnings to this effect have been issued in non-objection letters. There is a licensed modified release product available in the UK. Licensed products should always be used if they are able to meet the special needs of patients. See Appendix I for guidance.
9. Midodrine Tablets. Midodrine is a sympathomimetic used to treat kidney failure resulting from liver failure. It is also used to treat postural hypertension. There are no equivalent UK licensed products available.
10. Thyroid Oral Preparations. Some patients and prescribers believe “natural” thyroid preparations, rather than the synthetic preparations available in the UK, are more suitable for the treatment of some patients.

Table 2. Top 50 Products by rank order of number of notifications received (by calendar quarter)

Note: These rankings were obtained manually and although believed to be representative may contain errors

Rank	Q2 2009		Q3 2009		Q4 2009		Q1 2010		Q2 2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
1	Melatonin Products, All Doses And Presentations	2143	Co-Proxamol Tablets	4005	Co-Proxamol Tablets	2165	Co-Proxamol Tablets	5514	Co-Proxamol Tablets	5983
2	Co-Proxamol Tablets	1943	Vitamin Preps (Oral & Topical)	1454	Acetylcysteine Oral Preparations	1537	Melatonin Products, all doses and presentations	1517	Glyceryl Trinitrate Sublingual Tablets 0.8 mg	1593
3	Vitamin Preps (Oral & Topical)	725	Melatonin Products, All Doses And Presentations	1272	Vitamin Preps (Oral & Topical)	1290	Glyceryl Trinitrate Sublingual Tablets 0.8 mg	999	Vitamin Preps (Oral & Topical)	1023
4	Acetylcysteine Preparations	634	Acetylcysteine Oral Preparations	1117	Midodrine Tablets All Doses	831	Vitamin Preps (Oral & Topical)	905	Acetylcysteine Oral Preparations	944
5	Glyceryl Trinitrate Buccal/Sublingual Preparations, All Doses	617	Midodrine Tablets All Doses	608	Melatonin Products, All Doses and Presentations	651	Acetylcysteine Oral Preparations	665	Dapoxetine 30 mg Tablets	723
6	Midodrine Tablets All Doses	423	Glyceryl Trinitrate Oral Preparations	605	Glyceryl Trinitrate Oral Preparations	606	Sodium Chloride 0.9% W/V Solution For Infusion	600	Patent Blue V 2.5% Solution	407
7	Patent Blue V 2.5% Solution	301	Fumaric Acid Oral Preps, All Doses	425	Tranexamic Acid 100mg/ml Injections	444	Midodrine Tablets All Doses	594	Thioridazine 50 & 100 mg Tablets	330
8	Trabectedin Powder For Infusion, All Doses	200	Glycopyrronium Bromide Tablets All Doses	342	Patent Blue V 2.5% Solution	429	Homoeopathic Products	433	Melatonin Products, All Doses And Presentations	326
9	Prick/Patch Testing Allergens Solutions	188	Pyrazinamide Tablets 500 mg	321	Rifaximin Tablets 200 mg	413	Glycopyrrolate 1& 2 mg Tablets	423	Midodrine Tablets All Doses	310
10	Progesterone Creams ("Natural")	183	Rifaximin Tablets 200 mg	315	Trabectedin Infusions	409	Tapentadol Tablets, All Strengths	339	Thyroid Oral Preparations	287
11	Pixantrone 50 mg Injection	182	Lidocaine Topical Preparations (Gels, Solutions, Patches)	300	Fumaric Acid Oral Preps, All Doses	356	Allergy Patch/Prick Tests	307	Allergy Prick/Patch Tests	256
12	Homoeopathics	180	Skin Patch/Prick Testing Allergen Solutions	293	Bisacodyl Enemas	281	Patent Blue V 2.5% Solution	303	Benzathine Penicillin Injections	231
13	Talc For Pleurodesis	165	Thyroid Oral Preparations	275	Oral Thyroid Preparations	276	Acetylcysteine 5% Eye Drops	279	Rifaximin Tablets 200 mg	216
14	Monocomponent Measles	150	Talc Preparations for	260	Acetylcysteine 5% Eye	268	Paclitaxel Protein-Bound Particles 100mg Injection	276	Lidocaine Topical	209

Rank	Q2 2009		Q3 2009		Q4 2009		Q1 2010		Q2 2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
	Vaccines		Pleurodesis		Drops		Suspension		Preparations	
15	Topical Lidocaine Preparations	141	Trabectedin Infusions	248	Pirenzepine 50 mg Tablets	228	Thyroid Oral Preparations	265	Homoeopathics	208
16	Eslicarbazepine Acetate 800 mg Tablets	141	Patent Blue V Injections	224	Allergy Patch/Prick Tests	206	Fumaric Acid Oral Preps, All Doses	227	Fumaric Acid Oral Preps, All Doses	196
17	Fumaric Acid Tablets All Doses	133	Benzathine Penicillin Injections	215	Hydroquinone Creams Including With Tretinoin, Hydrocortisone Etc.	187	Pyrazinamide Tablets 500 mg	193	Tapentadol Tablets, All Strengths	195
18	Decitabine 50 mg	132	Hydroquinone Creams Including With Tretinoin, Hydrocortisone etc.	213	Homoeopathics	187	Progesterone Creams 1.5 & 3%	186	Prednisolone 5 mg Suppositories	182
19	Bromocriptine 2.5 mg Tablets	130	Procaine Benzylpenicilline Injection	208	Lidocaine Topical Preparations (Gels, Solutions, Patches)	186	Lidocaine Topical Preparations (Gels, Solutions, Patches)	179	Progesterone Creams ("Natural")	181
20	Glycopyrrolate Tablets 1 & 2 mg	126	Bisocodyl~ 10 mg/30 ml Enemas	205	Dexamethasone Injections, All Doses	185	Dexamethasone Injections, All Strengths	177	Glycopyrrolate 1& 2 mg Tabs	176
21	Sulfadoxine + Pyrimethamine 500 mg + 25 mg Tablets	114	Homoeopathics	205	Idebenone Tablets & Capsules, All Doses	172	Rifaximin 200 mg Tablets	166	Sodium Chloride Ophthalmic Preparations	171
22	Monocomponent Rubella Vaccines	110	Sodium Chloride Ophthalmic Preparations (Ointments & Drops)	198	Pyrazinamide Tablets 500 mg	172	Benzathine Benzylpenicillin Injections, All Doses	161	Flunarizine Tablets & Capsules 5 & 10 mg	153
23	Iloprost Injections, All Strengths And Doses	106	Vitamins (Parenteral)	194	Talc For Pleurodesis	170	Talc For Pleurodesis	150	Vitamin Preps (Parenteral)	152
24	Idebenone Tablets & Capsules, All Doses	101	Monocomponent Mumps Vaccine (L-Zagreb Strain) - (OBJECTION To Import)	182	Vitamin Injections	168	Pirenzepine 50 mg Tablets	144	Defibrotide 200 mg Inj	149
25	Defibrotide 200 mg Inj	100	Pentosan Polysulphate 50 & 100 mg Capsules	177	Progesterone Creams ("Natural")	163	Povidone Iodine Topical Ointments, Solutions All Strengths	142	Talc For Pleurodesis	141
26	Benzbromarone 50 & 100 mg Tablets	100	Progesterone Creams	175	Oxytetracycline Hydrochloride + Hydrocortisone Ointments	158	Triamcinolone Injections 20 & 40 mg/ml	139	Suxamethonium Chloride 100 mg/2 ml Injection	140

Rank	Q2 2009		Q3 2009		Q4 2009		Q1 2010		Q2 2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
27	Rifaximin 200 mg Tablets	98	Mexiletine Capsules All Strengths	164	Benzathine Penicillin Injections	157	Defibrotide 200mg Inj	123	Trabectedin Powder For Infus All Strengths	137
28	Thyroid Oral Preparations	97	Sulphamethoxypridazine 500 mg Tablets	159	Pentosan Polysulfate Sodium 100 mg Capsules	155	Cholestyramine Oral Suspensions	119	Procaine Penicillin Injections	131
29	Bendamustine Hydrochloride Preparations, All Strengths And Doses	95	Triamcinolone Injections	153	Sodium Nitroprusside 50 mg Injection	151	Iloprost Injection 50 & 100 mcg	116	Povidone-Iodine Topical & Eye Preps, All Strengths	130
30	Pirenzepine Dihydrochloride 50 mg Tablets	92	Phenylbutazone Tablets 100 mg	152	Indomethacin 25 mg/5 ml Suspension 100 ml	143	Prednisolone Sodium Phosphate 5 mg Suppositories	115	Fosfomycin Oral Preparations, All Doses	129
31	Dactinomycin 0.5 mg Injections	88	Idebenone 45 mg Tablets& Capsules	148	Triamcinolone Injections, All Strengths And Doses	142	Benzatropine 1 & 2 mg Tablets	112	Hydroquinone Creams Including With Tretinoin, Hydrocortisone Etc.	126
32	Flunarizine Tablets & Capsules 5 & 10 mg	87	Pirenzepine 50 mg Tablets	148	Dexamethasone Tablets, All Doses	136	Trabectedin 0.25 & 1 mg Powder For Infus	105	Decitabine 50 mg Injection	120
33	Mifamurtide Injections	86	Progesterone 200 mg Oral/Vag Caps	144	Flunarizine Tablets & Capsules, All Doses	136	Bisacodyl Enemas 10 mg/30 ml	103	Clindamycin Suspensions 75 mg/5 ml	119
34	Sodium Nitroprusside 50 mg Injection	85	Clindamycin Suspension 75 mg/5 ml	125	Insulins (Human), All Doses	135	Procaine Benzylpenicillin Injections, All Doses	101	Betamethasone Sodium Phosphate 4mg Injection	115
35	Pirfenidone 267 mg Capsule	81	Prednisolone 5 mg Suppositories	123	Prednisolone 5 mg Suppositories	132	Hydroquinone Creams Including With Tretinoin, Hydrocortisone Etc.	90	Methergin ~ Injection 0.2 mg/ ml	111
36	Pyrazinamide Tablets 500 mg	79	Bethanechol Tabs 10 & 25 mg	115	Iron Containing Injections	124	Probenecid Tablets 500 mg	89	Sulphamethoxypridazine 500mg Tablets	110
37	Prednisolone 5mg Suppositories	74	Phenoxybenzamine 5 & 10 mg Caps	111	Atropine 1% Eye Drops	117	Clindamycin Suspension 75 mg/5 ml	89	Triamcinolone Acetonide 1 mg + Nystatin 100 000 IU + Neomycin 2.5 Ear Ointments	109
38	Insulins	73	Carmustine 100 mg Powder For Injection	107	Iloprost Injections, 50 & 100 mg	109	Amikacin Sulfate Injection 500 mg/2 ml	87	Sodium Nitroprusside 50 mg Injection	106
39	Ferric Sodium Gluconate Injection Solution 62.5 mg/ 5ml	72	Benzbromarone 50 & 100 mg Tabs& Caps	103	Glycopyrrolate 1& 2 mg Tablets	108	Triamcinolone Acetonide 1 mg/G + Neomycin 2.5mg + Gramicidin Ear Ointment	86	Albendazole Tablets 400 mg	104

Rank	Q2 2009		Q3 2009		Q4 2009		Q1 2010		Q2 2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
40	Pentosan Polysulfate 50 & 100 mg Capsules	71	Flunarazine Capsules & Tablets All Doses	103	Paclitaxel Protein-Bound Particles 100mg Injection Suspensions	108	Sodium salicylate 500 mg Tablets	80	Dexamethasone 0.5 mg Tablets	102
41	Hydroquinone + Tretinoin + Hydrocortisone Creams	69	Dried Bacterial Cells (Streptococcus Pyogenes) Injections	102	Sultiame Tablets 50 mg	108	Mexiletine Capsules, All Doses	80	Sulfadiazine 500 mg Tablets	100
42	Clofazimine 50mg Caps	64	Ubidecarenone (Co-Enzyme Q10) Oral Preps	102	Dextromoramide Tartrate Tablets 5 mg	106	Flunarazine Tablets & Capsules, All Doses	80	Ustekinumab 45 mg/0.5 ml Injection	99
43	Acetazolamide Injection 500 mg	63	Hydroxycarbamide 500 mg Capsules	101	Captopril Oral Solution 5 mg/ml	105	Thyroid Parenteral Preps	77	Iloprost Injection 50 & 100 mcg	94
44	Dextromoramide Tablets 5 mg	58	Sodium Nitroprusside 50 mg Injection	99	Prilocaine HCl 30 mg/ml + Felypressin 0.03 Iu/ml Dental Octapressin	98	Idebenone 45 & 150 mg Tablets	73	Pirenzepine 50 mg Tablets	93
45	Ubidecarenone 50 mg oral preparations	56	Bendamustine Hydrochloride Injections	96	Clindamycin Suspension & Granules For Suspension 75 mg/5 ml	97	Dapoxetine Tablets 30 mg	63	Acetazolamide Injection 500 mg	90
46	Disulfiram Tablets 500 mg	56	Etilefrine Tablets & Capsules All Doses	96	Diazoxide Oral Preparations All Doses	94	Benzbromarone 100 mg Tablets	63	Atomoxetine Capsules All Doses	84
47	Vitamins Preparations (Parenteral)	54	Iron Containing Injections	91	Monocomponent Measles Vaccines	90	Decitabine 50 mg Injection	60	Pyrazinamide Tablets 500 mg	82
48	Oseltamivir Capsules 75 mg	52	Melperone Tabs, All Doses	88	Monocomponent Rubella Vaccines	90	Potassium Canrenoate Injection 200 mg / 10 ml	58	Indigo Carmine Injections, All Strengths	79
49	Tacrolimus 0.5 & 1 mg Caps	45	Ustekinumab 45 mg/0.5 ml Injection	84	Disulfiram Tablets 100 & 500 mg	88	Cefuroxim 1.5 g Powder For Solution For Infusion	58	Labetalol 5 mg/ ml Injections	78
50	Phenylbutazone 100 & 200 mg Tablets	45	Defibrotide 200 mg Inj	83	Defibrotide 200 mg Injections	85	Clonazepam Oral Drops 2.5 mg/ml	57	Gentamicin Sulphate Cream 0.1%	74

2.2.1 Co-proxamol

There are serious safety concerns over the use of co-proxamol. It is therefore a matter of some concern that the number of notifications for import of unlicensed co-proxamol is rising.

2.3 Vaccines

It may be noted that for vaccines, where any second administration is more than 3 months after the first, the maximum quantity permitted per notification is 25 unit doses.

Table 4 gives a summary of vaccine notifications for Q2/2001 to Q2/2010. As with the listings for other products, the data are for valid notifications only and do not include cancellations or incomplete notifications. The listing includes notifications which may not be intended for placing on the UK market. It includes both acceptable products and those to which objections to import have been raised. It is therefore not an indicator of product acceptability.

Table 3 Vaccines/Immunoglobulins notified by rank order of number of notifications by Calendar Quarter

Rank	Quarter 2/2009		Quarter 3/2009		Quarter 4/2009		Quarter 1/2010		Quarter 2/2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
1	Monocomponent Measles Vaccines	182	Monocomponent Mumps Vaccine (L-Zagreb strain notifications only)	182	Monocomponent Measles Vaccines	90	Diphtheria Tetanus & Pertussis Combined Vaccine	16	Tetanus Toxoid Absorbed 40 IU Inj	29
2	Monocomponent Rubella Vaccines	110	Haemophilus Influenzae Type B	33	Monocomponent Rubella Vaccines	90	Rubella (Wistar Ra 27/3 Strain)	13	Tetanus Immunoglobulin 250 IU Injection	27
3	Monocomponent Mumps Vaccine (L-Zagreb strain notifications only)	19	Anti-Rho (D) Immune Globulin (Human) - All Doses	26	Anti-Rho (D) Immune Globulin (Human) Powder For Inj All Doses	76	Measles Virus Vaccine Live - Edmonston - Zagreb Strain	12	Rabies Immunoglobulins Solution For Injection	11
4	Hepatitis-B-Immunoglobulin	16	Measles Vaccine	25	Haemophilus Influenzae Type B Vaccine 0.5 ml	28	Human Normal Immunoglobulin	7	Japanese Encephalitis Vaccines	9
5	Varicella Zoster Immunoglobulin	13	Diphtheria and Tetanus Toxoids Adsorbed For Paediatric Use	21	Polio Vaccine Inactivated	28	Diphtheria Toxoid (Adsorbed)	4	Tuberculin Injections	8
6	Meningococcal Vaccines	7	Diphtheria And Tetanus Toxoids And Acellular Pertussis Vaccine For Paediatric Use	20	Diphtheria and Tetanus Adsorbed Infant Vaccine	25	Hepatitis B Vaccine	4	Haemophilus Influenzae B Vaccines	4
7	Single Tetanus Vaccine	5	Rubella (Wistar Ra 27/3 Strain)	13	Tetanus Vaccines	22	Varicella-Zoster Virus Vaccine Live Attenuated (Oka/Merck Strain)	4	Hepatitis B Vaccine (Recombinant Dna) 20 mcg/ml Injection Suspension	4
8	Antithymocyte Globulin (Rabbit)	4	Tetanus Toxoid Absorbed	13	Anthrax Antitoxin Vaccine 5% Soln 1x1	12	Haemophilus Influenzae Type B	1	Human Normal Immunoglobulins	4
9	Bacillus Calmette-Guerin (BCG)	4	Hepatitis B (Recombinant)	12	Meningitis C	10	Lyophilized Powder Containing Polyvalent Antiarachnid Immunoglobulin	1	Varicella Zoster Immunoglobulin	4
10	Haemophilus Influenzae Type B	4	H1N1 Influenza Vaccine	8	Meningococcal Polysaccharide-Diphtheria Toxoid Conjugate Group 4	8	Typhoid Vaccine (Live Oral Strain Ty21a)	1	Escherichia Coli Vaccine 6mg Capsules	3

Quarter 2/2009			Quarter 3/2009		Quarter 4/2009		Quarter 1/2010		Quarter 2/2010	
Rank	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
					mcg/0.5 ml Inj Soln					
11	Tetanus Toxoid Absorbed	3	Japanese Encephalitis Vaccine	6	Hepatitis B (Recombinant) Inj All Doses	7			Varicella-Zoster Virus Vaccine Live Attenuated	3
12	Polio Vaccine Inactivated	2	Rabies Vaccine	6	Lymphocyte Immune Globulin Anti-Thymocyte 50 mg/ml Injection	6			Inactivated Polio Vaccine	2
13	Tuberculin Purified Protein Derivative	2	Tetanus Immunoglobulin	6	Rabies Immunoglobulin 150 IU/ml Injection	6			Antithymocyte Globulin (Rabbit) 25 mg/5 ml Pow/Sol for Infusion	1
14	Diphtheria, Tetanus And Polio Vaccine	1	Adsorbed Diphtheria Tetanus and Pertussis Vaccine	5	BCG 81 mg Injection Soln	4			Rabies Vaccine (Flury Lep Strain)	1
15	Hepatitis B Vaccine (Recombinant DNA)	1	Lymphocyte Immune Globulin Anti-Thymocyte	5	Rotavirus Vaccine (Live, Oral Pentavalent Vaccine) Oral Solution	4			Suero Derived Immunoglobulin Polyvalent Antivenin	1
16	Human Normal Immunoglobulin	1	Polio IPV	5	Tetanus Immunoglobulin 250iu Injection	4				
17	Lyophilized Rabies Vaccine	1	Yellow Fever Vaccine	4	Varicella Zoster Immunoglobulin 125 IU/5 ml Infusion Soln	4				
18	Rabies Immunoglobulin	1	Varicella Zoster Immunoglobulin	4	Rabies Vaccine Powder and Solvent For Suspension For Inj	1				
19			Meningococcal Polysaccharide-Diphtheria Toxoid Conjugate Group	3						
20			Cytomegalovirus Immunoglobulin	2						
21			BCG Intravesical Vaccine	1						

Rank	Quarter 2/2009		Quarter 3/2009		Quarter 4/2009		Quarter 1/2010		Quarter 2/2010	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
22			Botulism Immune Globulin Intravenous	1						
23					Human Normal Immunoglobulin	1				
24					Rabies Immunoglobulin	1				
25					Tetanus and Diphtheria Vaccine	1				

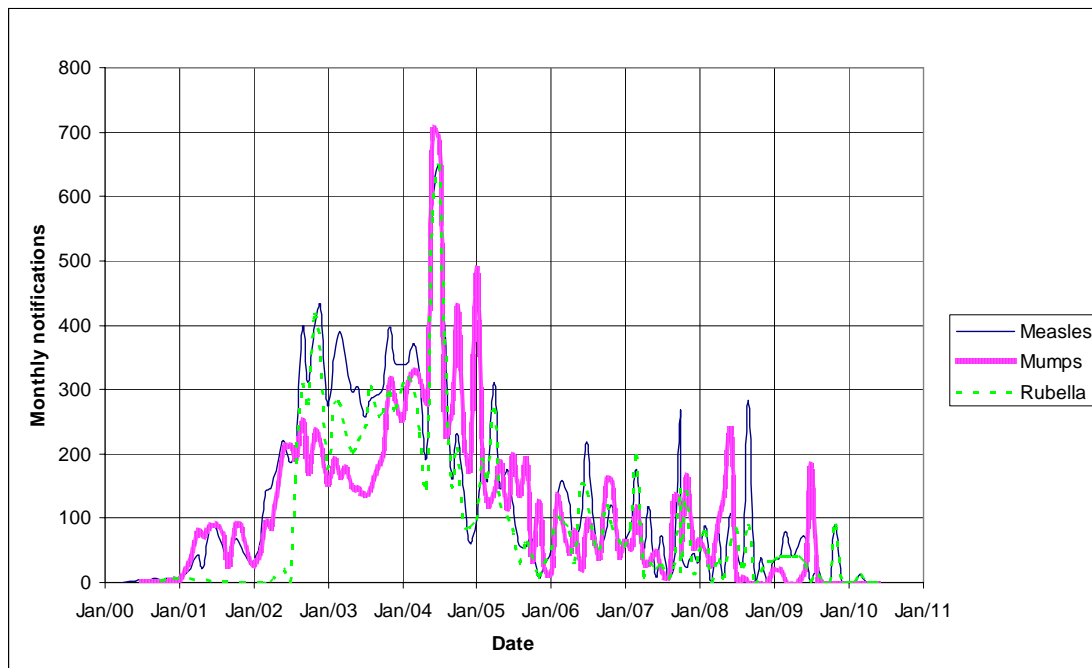
Notes:

1. L-Zagreb strain mumps vaccines attract objections on grounds of possible association with more frequent incidence of aseptic meningitis than with the Jeryl Lynn strain.

2.3.1 Measles, Mumps and Rubella Vaccines

Currently, the only monocomponent mumps vaccine that does not attract objections to import is Merck Mumpsvax, based on the Jeryl Lynn strain also used in UK licensed MMR vaccine. Mumpsvax is unavailable due to suspension of manufacture. No non-objection to import letters have been issued for monocomponent mumps vaccines since August 2008. There were no notifications for import of unlicensed measles and rubella vaccines in Q2 2010.

Graph 3 Monthly notifications for monocomponent measles, mumps and rubella vaccines to end of June 2010



Note: The peak around June 2004 follows legal advice that the MHRA must accept multiple notifications for the same product in any one day. Previously, the MHRA had only accepted one notification per product per day.

3 Issues arising

3.1 Administrative matters

3.1.1 Process timings – Clinical Emergencies

Normally, Clinical Emergency notifications can be processed within one working day. This can be up to four calendar days if the notification is received on a Friday afternoon. Some notifications can take longer if there are queries or if a medical assessment is required. A small number of notifications originally submitted as non-emergencies have been processed as emergencies resulting from changes in circumstances. These will show extended processing times.

Graph 4 shows the times taken to issue Clinical Emergency (approved) letters.

Graph 4 Time (days) to issue Clinical Emergency (Approved) letters from notification date, Q2 2010

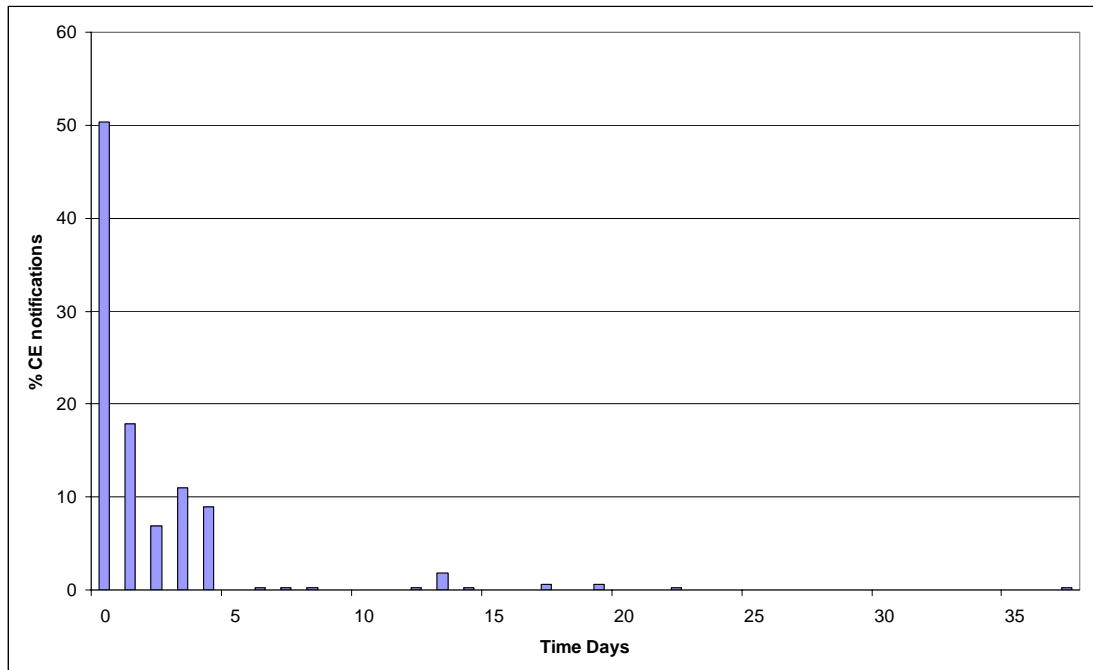


Table 4 Summary of Timings for Issuing Clinical Emergency (CE) Notifications (Q3 2009 – Q2 2010)

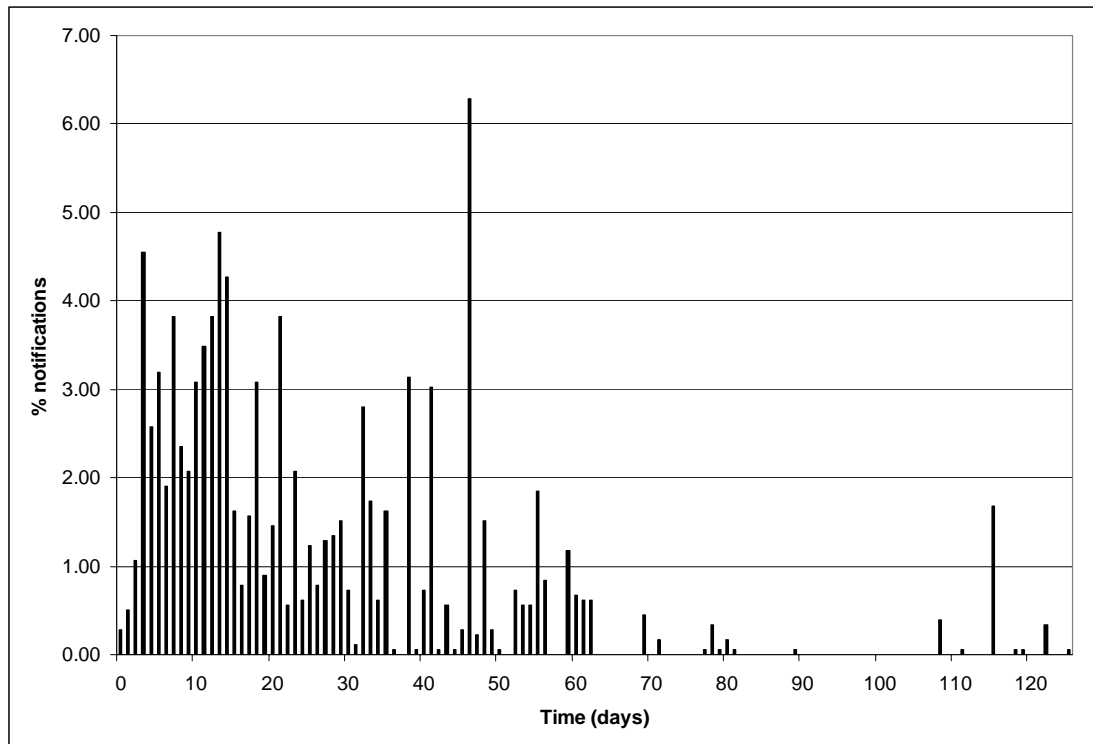
	Q3 2009	Q4 2009	Q1 2010	Q2 2010
% ≤ 4 days	91	90	98	95
% ≤ 1 day	62	31	69	68
Total CE Notns	247	744	226	336

3.1.2 Process timings – Routine notifications

Notifications received on spreadsheets may be given a bulk acknowledgement letter, in which case the date was not recorded on the database prior to a database upgrade in Q3 2009. Subsequent to upgrading, these dates are available and are now included in the statistics. Individual notification letters are individually acknowledged as are new notifications submitted on spreadsheets.

Graph 5 shows statistics for notifications for Q2/2010 where both received and acknowledgement letter issue dates are available and provides an estimate of the time taken to enter data onto the database after the received date of the notifications. The graph shows a large peak at 46 days. This was due to a single large spreadsheet of notifications. Nearly 2/3 of notifications were acknowledged within 31 days and approximately 3/4 within 38 days.

Graph 5 Time taken to issue Acknowledgement Letters after receipt, Q2 2010



Significant delays can be experienced due to the necessity to obtain additional information from some importers to enable completion of data entry. Additionally, some spreadsheets have been submitted containing very large numbers of notifications. These can take some time to enter into the database before acknowledgement letters can be issued and show as prominent peaks when graphed, as all the acknowledgments are issued simultaneously. As large spreadsheets take significant time for entry of data, this may cause considerable delay to entry of other data.

There were 56 Objection with Reason letters issued in Q2 2010. The target for these critical letters is within 28 days from the date of acknowledgment, as specified by SI 2005/2789. All were issued within 28 days of acknowledgment where acknowledgements were issued.

All Further Information Request letters issued in Q2 2010 were within 28 days of acknowledgment where acknowledgements were issued.

3.1.3 Discussion of timings

It is especially important to issue letters of objection and further information requests within the statutory 28 days from the date of acknowledgment. All critical letters fell within the 28 day requirement.

Efforts continue to try and reduce the time to enter data and issue acknowledgment letters. The analysis of timings is, however, difficult owing to unavoidable delays caused by the need to obtain further data before entry can proceed and due to other difficulties in interpreting timings recorded on the database. Additionally, it may be noted that as previously noted trends show an increase in the number of notifications being received. This may cause increased demand on Imports Notifications Section resources which could lead to increased processing times for notifications.

4 Conclusions

The Import Notification System is operating within the requirements of SI 2005/2789.

There is a continued upward trend in the number of notifications received which may place extra demands on Import Notifications Section resources.

There are some concerns over the increasing quantities of unlicensed co-proxamol notified for import.

Appendix I Risk Hierarchy for the use of unlicensed medicines

Risk Hierarchy for the use of unlicensed medicines

- An unlicensed product should not be used where a product available and licensed within the UK could be used to meet the patient's special need.
- Although the MHRA does not recommend "off label" (outside of the licensed indications) use of products, if the UK licensed product can meet the clinical need, even "off-label", it should be used in preference to an unlicensed product. Licensed products available in the UK have been assessed for quality safety and efficacy. If used "off-label" some of this assessment may not apply, but much will still be valid. This is a better risk position than in the use of an unassessed, unlicensed product. The fact that the intended use is outside of the licensed indications is therefore not a reason to use an unlicensed product. It should be understood that the prescriber's responsibility and potential liability are increased when prescribing off-label.
- If the UK product cannot meet the special need, then another (imported) medicinal product should be considered, which is licensed in the country of origin.
- If none of these options will suffice, then a completely unlicensed product may have to be used, for example, UK manufactured "specials", which are made in GMP inspected facilities, but which are otherwise unassessed (GMP inspection of specials manufacturers is not product specific). There may also be other products available which are unlicensed in the country of origin.
- The least acceptable products are those that are unlicensed in the country of origin, and which are not classed as medicines in the country of origin (but are in the UK). Hence, for example, the use of melatonin products from the USA, where melatonin products are classed as supplements, not pharmaceuticals and may not be made to expected standards of pharmaceutical GMP should be avoided whenever possible.