

Summary Report for Importation of Unlicensed Medicines

01 Apr 2011 – 30 Jun 2011

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Table of Contents

Table of Contents	2
1 Introduction.....	3
2 Important Notice	3
3 Notifications for importation	3
Countries of export of products	4
3.1 Most frequently notified products.....	4
3.2 Vaccines.....	10
4 Issues arising.....	13
4.1 Administrative matters.....	13
4.1.1 Process timings – Clinical Emergencies	13
4.1.2 Process timings – Routine notifications.....	14
4.1.3 Discussion of timings.....	14
5 Inspection liaison	15
6 Conclusions.....	15
Appendix I Risk Hierarchy for the use of unlicensed medicines.....	16
Appendix II Safety Information Letters for Vitamin D (colecalfiferol)	17

1 Introduction

This report reviews the Import Notification System (INS) to the end of June 2011. Appendix I provides a risk hierarchy that may be found useful in optimising quality and minimising risk when using unlicensed medicines.

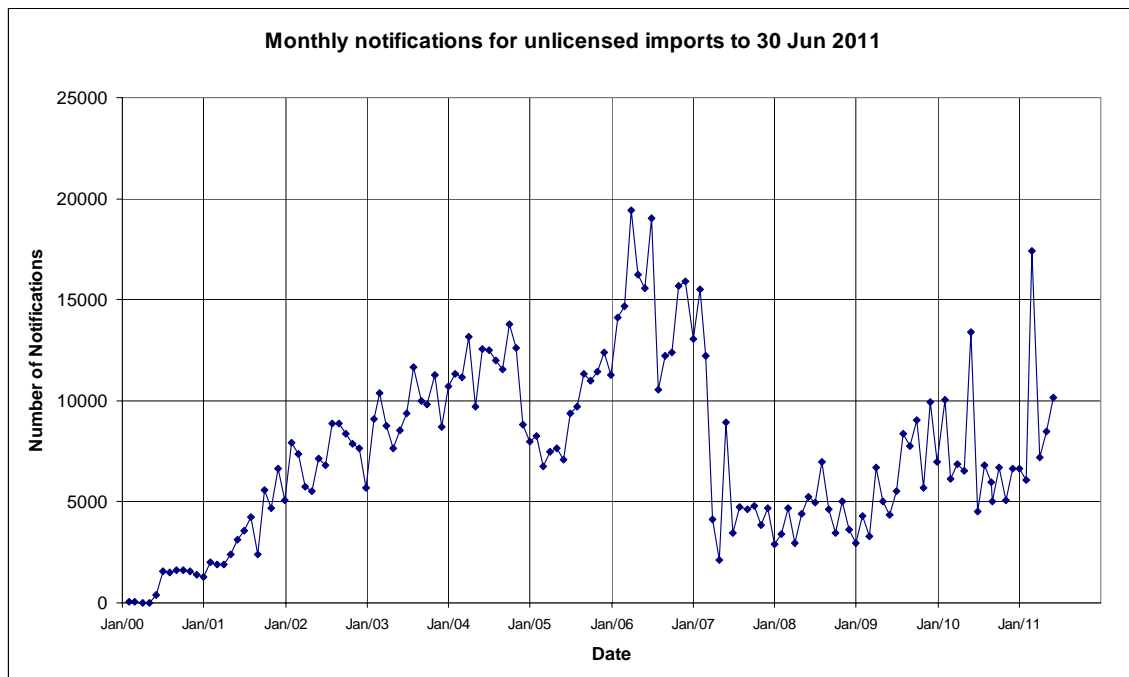
2 Important Notice

Following concerns over German labelled packs of the Vitamin D (colecalciferol) products Dekristol and Viganotoletten at the time of release of this report (Jan 2012), Drug Safety Information letters were issued drawing attention to the fact that these products contain allergens (arachis or peanut oil and soya oil, respectively). These letters have been appended in Appendix 2. Other dose strengths of these brands may also be affected. Additionally, it is understood that the Canadian product Osto-D2 Capsules also contains soya oil. Importers, suppliers and healthcare professionals are asked to ensure that relevant persons are made aware.

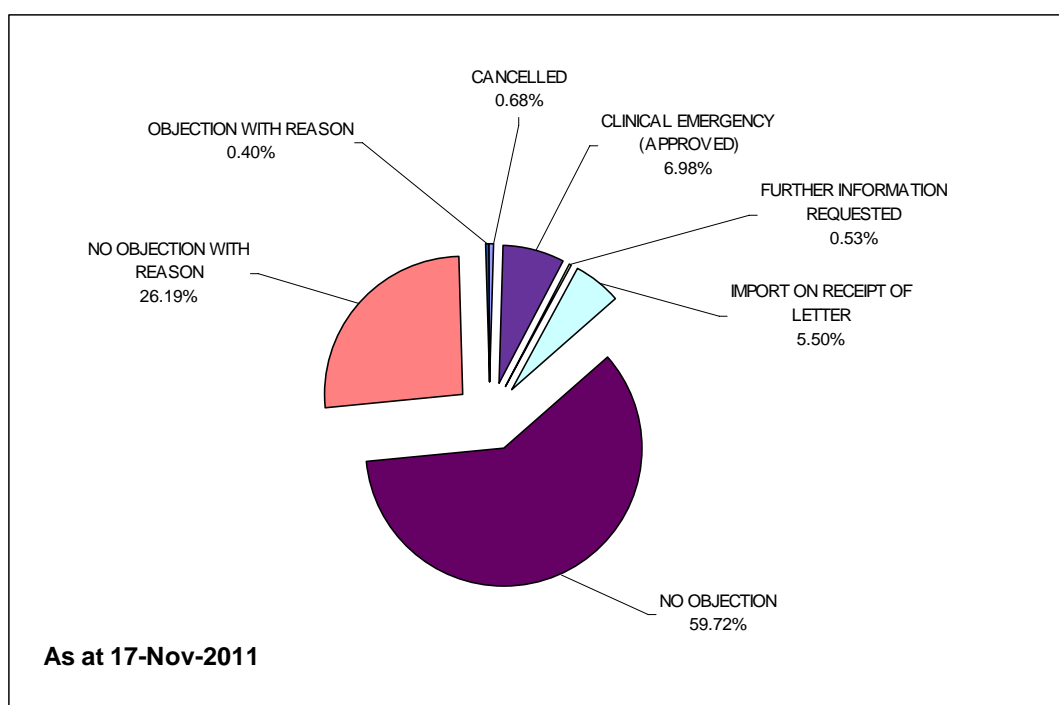
3 Notifications for importation

Graph 1 Monthly notifications for unlicensed imports

Note: Excludes invalid and cancelled notifications



Graph 2 Breakdown of notifications by status, 01 Apr – 30 Jun 2011



Countries of export of products

Table 1 Breakdown of valid notifications by country, 01 Apr– 30 Jun 2011

Exporting Countries	Number of Notifications
EEA	15891
Non EEA	9222
Grand Total	25113

3.1 Most frequently notified products

Table 2 lists the 50 most frequently notified products during Q2 2010 – Q2 2011 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. Vitamins (Oral & Topical). Vitamin Oral & Topical Preparations. Many of these may be used as general supplements or for skincare. Some are used for deficiency states.
2. Acetylcysteine Oral Preparations. These are mostly products with no UK licensed equivalents.
3. Albendazole 400 mg Tablets. An anthelmintic with no available equivalent UK licensed products.
4. Prednisolone 5 mg Suppositories. There has been a UK shortage of licensed product.

5. 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.
6. Midodrine Tablets. Midodrine is a sympathomimetic used to treat kidney failure resulting from liver failure. It is also used to treat postural hypotension. There are no equivalent UK licensed products available.
7. Rifaximin Oral Preparations, All Strengths. Rifaximin was not licensed in the UK but is licensed in the USA and some other countries for the treatment of travellers' diarrhoea caused by non-invasive strains of *Escherichia coli*. It has also been tried for other gastrointestinal disorders, including infectious diarrhoea in non-travellers, inflammatory bowel disease, abdominal distension, bloating and flatulence, small bowel bacterial overgrowth, diverticulitis, Crohn's disease, for surgical infection prophylaxis, and hepatic encephalopathy (- Martindale). As of mid August 2011 a licensed preparation is available in the UK (Norgine Xifaxanta 200 mg Tablets) and objection will be made to importation of equivalent unlicensed products to be supplied to the UK market after this date.
8. Allergy Prick/Patch Tests. There are a large number of specific patch tests that have no UK licensed equivalents. Where there are licensed UK equivalents, specialists frequently argue that for reasons of standardisation and clinical comparability it is necessary to use the same brand products for all tests.
9. Pyrazinamide 500 mg Tablets. Used for the treatment of tuberculosis, but not available as a monocomponent licensed product in the UK.
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 2010		Q3 2010		Q4 2010		Q1 2011		Q2 2011	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
1	Co-Proxamol Tablets	5983	Vitamin Preps (Oral & Topical)	1131	Co-Proxamol Tablets	2023	Vitamin Preps (Oral & Topical)	2911	Vitamin Preps (Oral)	3742
2	Glyceryl Trinitrate Sublingual Tablets 0.8 mg	1593	Co-Proxamol Tablets	1004	Progesterone Injections All Strengths	1805	Acetylcysteine Oral Preparations	1721	Acetylcysteine Oral Preparations	1399
3	Vitamin Preps (Oral & Topical)	1023	Acetylcysteine Oral Preparations	824	Vitamin Preps (Oral & Topical)	1157	Melatonin Products, All Doses and Presentations	1227	Albendazole 400 mg Tablets	873
4	Acetylcysteine Oral Preparations	944	Melatonin Products, all doses and presentations	661	Acetylcysteine Oral Preparations	1098	Co-Proxamol Tablets	816	Prednisolone 5 mg Suppositories	860
5	Dapoxetine 30 mg Tablets	723	Sodium Chloride Ophthalmic Preparations (Ointments & Drops)	631	Melatonin Products, All Doses and Presentations	845	Rifaximin 200 mg Tablets	789	Co-Proxamol Tabs 325mg/32.5 mg	830
6	Patent Blue V 2.5% Solution	407	Midodrine Oral Preparations, All Strengths	482	Midodrine Tablets All Strengths	816	Midodrine Tablets All Strengths	702	Midodrine 2.5 & 5 mg Tablets	788
7	Thioridazine 50 & 100 mg Tablets	330	Allergy Patch/Prick Tests	474	Rifaximin Oral Preparations, All Strengths	530	Thyroid Oral Preparations	501	Rifaximin 200 mg Tablets	731
8	Melatonin Products, All Doses And Presentations	326	Patent Blue V 2.5% Injection Solution	389	Patent Blue V 2.5% Solution	410	Patent Blue V 2.5% Solution	436	Allergy Prick/Patch Tests	613
9	Midodrine Tablets All Doses	310	Glyceryl Trinitrate Sublingual Tablets 0.8 mg	385	Fumaric Acid Oral Preps, All Doses	286	Fumaric Acid Oral Preps, All Doses	428	Pyrazinamide 500 mg Tablets	523
10	Thyroid Oral Preparations	287	Thyroid Oral Preparations	381	Allergy Patch/Prick Tests	214	Sodium Salicylate 175.0 mg Capsules	403	Thyroid Oral Preparations	522
11	Allergy Prick/Patch Tests	256	Bisacodyl Enemas 10 mg/30 ml	352	Pyrazinamide Tablets 500 mg	212	Allergy Prick/Patch Tests	402	Melatonin Products, All Doses and Presentations	488
12	Benzathine Penicillin Injections	231	Cyclosporine 0.05% Ophthalmic Preparations	301	Lidocaine Topical Preparations	192	Benzathine Penicillin Injections	369	Fumaric Acid Oral Preps, All Doses	415
13	Rifaximin Tablets 200 mg	216	Rifaximin Oral Preparations, All Strengths	270	Glycopyrrolate Tablets All Strengths	184	Dapoxetine Tablets All Strengths	355	Dapoxetine Tablets 30 & 60 mg	346

Rank	Q2 2010		Q3 2010		Q4 2010		Q1 2011		Q2 2011	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
14	Lidocaine Topical Preparations	209	Dopexamine Hydrochloride 50mg/5ml Concentrate For Solution	261	Pentosan Polysulfate Sodium Capsules All Strengths	183	Triamcinolone Topicals Incl Combinations	344	Glycopyrrolate Oral Preparations All Strengths	344
15	Homoeopathics	208	Fumaric Acid Oral Preps, All Doses	252	Ibuprofen 300mg Iodine/ml Solution	178	Pyrazinamide Tablets 500 mg	338	Bisacodyl Enema 10 mg/30 ml	329
16	Fumaric Acid Oral Preps, All Doses	196	Benzathine Penicillin Injections	252	Benzathine Benzylpenicillin Injections All Strengths	165	Procaine Benzylpenicillin Injections All Strengths	330	Lorazepam 2 & 4 mg/ml Injections	321
17	Tapentadol Tablets, All Strengths	195	Lidocaine Topical Preparations	226	Progesterone Creams ("Natural")	161	Bisacodyl Enemas 10mg/30ml	316	Peritoneal Dialysis Solutions	319
18	Prednisolone 5 mg Suppositories	182	Droxidopa 100 & 200 mg Capsules & Tablets	204	Thyroid Oral Preparations	158	Peritoneal Dialysis Solutions	298	Topical Lidocaine Preparations, Incl Patches, Ointments, Gels, Etc	275
19	Progesterone Creams ("Natural")	181	Pyrazinamide 500 mg Tablets	191	Phytomenadione Oral Preparations	156	Iloprost Injections and Infusions	287	Defibrotide 200 mg Injection	269
20	Glycopyrrolate 1 & 2 mg Tabs	176	Progesterone Creams ("Natural")	184	Prilocaine Injections	154	Phytomenadione Oral Preparations	281	Iloprost Injections & Infusions	267
21	Sodium Chloride Ophthalmic Preparations	171	Talc For Pleurodesis	163	Povidone Iodine Preparations	151	Prednisolone 5 mg Suppositories	250	Vitamin Preps (Parenteral)	259
22	Flunarizine Tablets & Capsules 5 & 10 mg	153	Flunarizine Tablets & Capsules 5 & 10 mg	146	Triamcinolone Injections	148	Betamethasone Injections, All Strengths	249	Pentosan Polysulfate 50 & 100 mg Capsules	248
23	Vitamin Preps (Parenteral)	152	Glycopyrrolate 1 & 2 mg Tablets	143	Clindamycin Oral Preparations	138	Prednisolone Sodium Succinate Injections	246	Clindamycin Suspension 75 mg/5 ml	233
24	Defibrotide 200 mg Inj	149	Homoeopathics	138	Pirenzepine 50mg Tablets	120	Nystatin Oral and Topical Products	241	Progesterone Creams ("Natural")	219
25	Talc For Pleurodesis	141	Procaine Penicillin Injections	125	Magnesium Oral Preparations	119	Sodium Nitroprusside Injections	241	Patent Blue V 2.5% Injections	210
26	Suxamethonium Chloride 100 mg/2 ml Injection	140	Sulphamethoxypyridazine 500 mg Tablets	121	Talc For Pleurodesis	113	Chlorpromazine Tablets, All Doses	221	Triamcinolone , Gramicidin, Neomycin, Nystatin Ear Ointments	209
27	Trabectedin Powder For Infus All Strengths	137	Triamcinolone/Antibiotic Combination Ointments	120	Sodium Nitroprusside 50 mg Injection	111	Sulphamethoxypyridazine 500 mg Tablets	212	Dactinomycin 0.5 mg Injections	185
28	Procaine Penicillin	131	Hydroquinone Creams Including with Tretinoin,	115	Hydroquinone Creams Including with Tretinoin,	105	Petrolatum & Mineral Oil	211	Triamcinolone	185

Rank	Q2 2010		Q3 2010		Q4 2010		Q1 2011		Q2 2011	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
	Injections		Hydrocortisone Etc.		Hydrocortisone etc.		Ophthalmic Ointments		Hexacetonide Injections	
29	Povidone-Iodine Topical & Eye Preps, All Strengths	130	Povidone Iodine Topical Ointments, Solutions All Strengths	113	Prednisolone Sodium Phosphate 5 mg Suppositories	103	Talc For Pleurodesis	208	Benzathine Penicillin Injections	179
30	Fosfomycin Oral Preparations, All Doses	129	Pentosan Polysulfate Sodium 100mg Capsules	108	Procaine Benzylpenicillin Injections All Strengths	102	Oxytetracycline + Hydrocortisone Ointments	201	Disulfiram 500 mg Tablets	177
31	Hydroquinone Creams Including With Tretinoin, Hydrocortisone Etc.	126	Trabectedin Injections & Infusions	107	Iloprost Injection 50 mcg	101	Triamcinolone Injections	193	Sulphamethoxypyridazine 500 mg Tablets	175
32	Decitabine 50 mg Injection	120	Mepivacaine Hydrochloride Injections	104	Homoeopathics	101	Povidone Iodine Topical Preparations	190	Amikacin Sulfate Inj 500 mg/2 ml	172
33	Clindamycin Suspensions 75 mg/5 ml	119	Moxifloxacin 0.50% Ophthalmic Solutions	101	Mepivacaine Hydrochloride Injections	100	Sodium Chloride Injections/Infusions	187	Pirenzepine 50 mg Tablets	171
34	Betamethasone Sodium Phosphate 4mg Injection	115	Insulins	101	Triamcinolone Acetonide + Neomycin + Gramicidin Ear Ointments	100	Sodium Chloride Ophthalmic Preparations	185	Homoeopathics	138
35	Methergin ~ Injection 0.2 mg/ ml	111	Ustekinumab 45 mg Injections	99	Flunarizine Tablets & Capsules, All Doses	97	Homoeopathics	185	Sodium Chloride Ophthalmic Preparations	135
36	Sulphamethoxypyridazine 500mg Tablets	110	Triamcinolone Injections	96	Sodium Chloride Ophthalmic Preparations (Ointments & Drops)	97	Amitriptyline Oral Formulations, All Doses	182	Flunarizine 5 & 10 mg Tablets & Capsules	134
37	Triamcinolone Acetonide 1 mg + Nystatin 100 000 IU + Neomycin 2.5 Ear Ointments	109	Lithium Chloride Solution Injection 0.15 mmol/ml	95	Amikacin Sulfate Injections All Strengths	87	Disulfiram Tablets, All Strengths	182	Cyclosporin Ophthalmic Preparations	115
38	Sodium Nitroprusside 50 mg Injection	106	Defibrotide 200mg Injections	90	Vitamin Preps Parenteral	76	Glycopyrrolate Tablets All Strengths	177	Biotin 5 mg Tablets	107
39	Albendazole Tablets 400 mg	104	Fosfomycin Sachets & Capsules For Oral Use	87	Sultiame Tablets All Strengths	76	Ubidecarenone Oral Preparations	176	Fosfomycin Sodium Injection 4g	107
40	Dexamethasone 0.5 mg Tablets	102	Prednisolone Sodium Phosphate 5 mg Suppositories	82	Vasopressin 20 iu/ml Injection	72	Vitamin Preps (Parenteral)	175	Abiraterone Acetate 250 mg Tablets	105
41	Sulfadiazine 500 mg	100	Clindamycin Oral Liquids	81	Albendazole Tablets All	70	Prilocaine & Felypressin	171	Carmustine 100 mg	104

Rank	Q2 2010		Q3 2010		Q4 2010		Q1 2011		Q2 2011	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
	Tablets		75 mg/5 ml		Strengths		Injections		Pow/Soln For Inj	
42	Ustekinumab 45 mg/0.5 ml Injection	99	Betamethasone 4 mg/ml Injection	80	Probenecid Tablets 500 mg	69	Succimer Capsules 100 mg	169	Sodium Nitroprusside 50 mg Injections	102
43	Iloprost Injection 50 & 100 mcg	94	Ubidecarenone (Co-Enzyme Q10) Oral Preps	65	Biotin Tablets All Strengths	68	Fosfomycin Injections & Infusions	164	Insulin Injections	99
44	Pirenzepine 50 mg Tablets	93	Sodium Chloride Injections & Infusions	64	Petrolatum & Mineral Oil Ophthalmic Ointments	64	Flunarizine Tablets & Capsules All Strengths	162	Trimetazidine Tablets All Strengths	97
45	Acetazolamide Injection 500 mg	90	Fosfomycin Injections & Infusions	62	Fosfomycin Oral Preparations	63	Topical Lidocaine Preparations, Incl Patches, Ointments, Gels, Etc	155	Oxytetracycline + Hydrocortisone Ointments	94
46	Atomoxetine Capsules All Doses	84	Fomepizole Injections & Infusions	61	Ornithin Aspartate Granules	61	Trazodone Hydrochloride 100 mg Tablets	154	Idebenone 45 & 150 mg Tablets 1x30	93
47	Pyrazinamide Tablets 500 mg	82	Iloprost Solutions All Strengths	60	Streptozocin Powder For Injection 1g	61	Abiraterone Acetate 250 mg Tablets	151	Prilocaine & Felypressin Injections	93
48	Indigo Carmine Injections, All Strengths	79	Decitabine 50 mg Injection	60	Acetazolamide Injection 500 mg	60	Etilefrine Hydrochloride 10 mg/ml Injections	150	Estradiol Implants/Pellets	86
49	Labetalol 5 mg/ ml Injections	78	Benzbromarone 100 mg Tablets	60	Defibrotide 200 mg Injections	60	Lorazepam Injections	148	Vasopressin 20 iu/ml Injections	85
50	Gentamicin Sulphate Cream 0.1%	74	Biotin 5 & 10 mg Tablets	59	Eribulin Mesylate 1 mg Injections	60	Hydrocortisone Tablets All Strengths	140	Flupirtine Maleate Capsules 100 mg	65

3.2 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 3 gives a summary of vaccine notifications for Q2/2010 to Q2/2011. 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 2/2010		Quarter 3/2010		Quarter 4/2010		Quarter 1/2011		Quarter 2/2011	
	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
1	Tetanus Toxoid Absorbed 40 IU Injection	29	Inactivated Polio Vaccines	11	Tetanus Immunoglobulin 250 iu Injection	14	Monocomponent Measles Vaccines	66	Adsorbed Diphtheria And Tetanus Vaccine	49
2	Tetanus Immunoglobulin 250 IU Injection	27	Rabies Immunoglobulin	10	Rabies Immunoglobulin Human 150 Iu/ml Injection Soln	9	Monocomponent Rubella Vaccines	48	Anti Thymocyte Globulin (Equine)	19
3	Rabies Immunoglobulins Solution For Injection	11	Human Normal Immunoglobulin	9	Anti Thymocyte Globulin (Equine) 50 mg/ml Injection Soln	4	DTPA Vaccine	12	Rotavirus Vaccine (Live, Oral Pentavalent Vaccine)	9
4	Japanese Encephalitis Vaccines	9	Cytomegalovirus Immune Globulin Human	6	Hepatitis B Immunoglobulin (Human) 500 iu Injection Soln	4	Rabies Immunoglobulin Human	7	Hepatitis A (Inactivated) + Hepatitis B	4
5	Tuberculin Injections	8	Japanese Encephalitis Virus Vaccine Inactivated	6	<i>Escherichia coli</i> Vaccine 6 mg Capsules	1	Human Normal Immunoglobulin 20%	5	Human Normal Immunoglobulin 20%	4
6	Haemophilus Influenzae B Vaccines	4	Pneumococcal 13-Valent Conjugate Vaccine	6	Japanese Encephalitis Vaccine	1	Rho (D) Immune Globulin (Human)	5	Haemophilus Influenzae B Conjugate (With Tetanus Toxoid)	2
7	Hepatitis B Vaccine (Recombinant Dna) 20 mcg/ml Injection Suspension	4	Tetanus Immunoglobulin	5	Monocomponent Measles Vaccines	1	Adsorbed Diphtheria And Tetanus Vaccine	4	Tetanus Immunoglobulin	2
8	Human Normal Immunoglobulins	4	Lymphocyte Immune Globulin Anti Thymocyte Globulin (Equine)	4	Polyvalent IgM Enriched Immunoglobulin 5% Solution (50mg/ml)	1	Diphtheria + Tetanus + Pertussis + Polio + Hepatitis B + Haemophilus Type B	4	Anti-Human T-Lymphocyte Immunoglobulin 20mg/MI	1
9	Varicella Zoster Immunoglobulin	4	<i>Escherichia coli</i> Vaccine 6 mg Capsules	3			Leptospirosis Vaccine Inactive	4	Botulism Immune Globulin Intravenous	1
10	<i>Escherichia coli</i> Vaccine 6mg Capsules	3	Monocomponent Measles Vaccines	3			Tetanus Toxoid 20 IU + Diphtheria Toxoid 2 IU + Pertussis Toxoid 8 mcg + Pertactin 2.5 mcg	4	Diphtheria Antitoxin	1

Quarter 2/2010			Quarter 3/2010		Quarter 4/2010		Quarter 1/2011		Quarter 2/2011	
Rank	Product	No.	Product	No.	Product	No.	Product	No.	Product	No.
11	Varicella-Zoster Virus Vaccine Live Attenuated	3	Monocomponent Rubella Vaccines	3			Inactivated Polio Vaccine	2	Human Anti-D Immunoglobulin	1
12	Inactivated Polio Vaccine	2	Hepatis-B-Immunoglobulin	2			Tetanus Vaccines	2	Measles Vaccine (Schwarz Strain)	1
13	Antithymocyte Globulin (Rabbit) 25 mg/5 ml Pow/Sol for Infusion	1	Rotavirus Vaccine (Live, Oral Pentavalent Vaccine)	2			Tuberculin PPD TT 23 SSI 10 & 2 TU Preparations	2	Meningococcal Vaccine (Groups A C W135 And Y)	1
14	Rabies Vaccine (Flury Lep Strain)	1	Varicella Zoster Immunoglobulin	2			Anti-Human T-Lymphocyte Immunoglobulin 20 mg/ml	1	Poliomyelitis Vaccine Inactivated	1
15	Suero Derived Immunoglobulin Polyvalent Antivenin	1	Yellow Fever Vaccine	2			Bacillus Calmette-Guerin (BCG)	1	Rabies Immunoglobulin Human	1
16			Bacillus Calmette Guerin (BCG)	1			Haemophilus Influenzae Type B Conjugate Tetanus Protein	1	Rubella Vaccine (Wistar Ra 27/3 Strain)	1
17			Diphtheria Antitoxin	1			Japanese Encephalitis Vaccine	1	Tetanus Toxoid Adsorbed	1
18			Haemophilus Influenzae Type B Conjugate Tetanus Protein	1			Lymphocyte Immune Globulin Anti Thymocyte Globulin (Equine)	1		
19			Hepatitis B (Recombinant)	1						
20			Tuberculin PP RT 23 SSI 2TU	1						
21			Typhoid Vaccine (Live Oral Strain Ty21a)	1						
22			Varicella-Zoster Virus Vaccine Live Attenuated (Oka/Merck Strain)	1						

4 Issues arising

4.1 Administrative matters

4.1.1 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 number of notifications originally submitted as non-emergencies have been processed as emergencies resulting from changes in circumstances. These will show extended processing times and, for example, account for the peak at 10 days in Graph 3, which is due to a single product. The abnormally large number of Clinical Emergency notifications arose due to shortages of Peritoneal Dialysis solutions.

Graph 3 shows the times taken to issue Clinical Emergency (approved) letters.

Graph 3 Time (days) to issue Clinical Emergency (Approved) letters from received date, Q2 2011

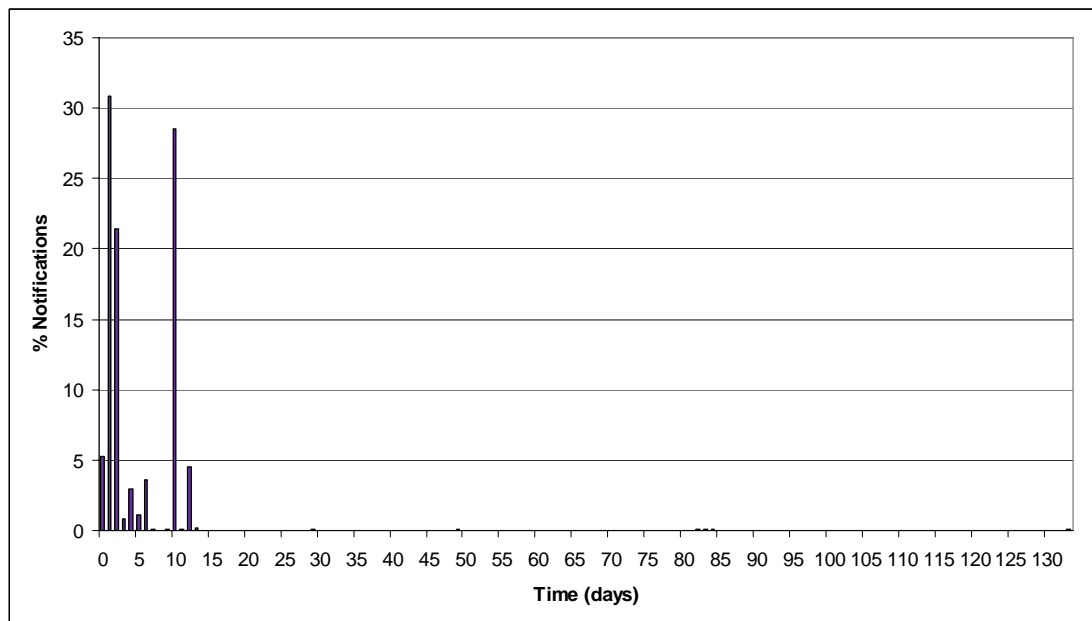


Table 4 Summary of Timings for Issuing Clinical Emergency (CE) Notifications (Q3 2010 – Q2 2011)

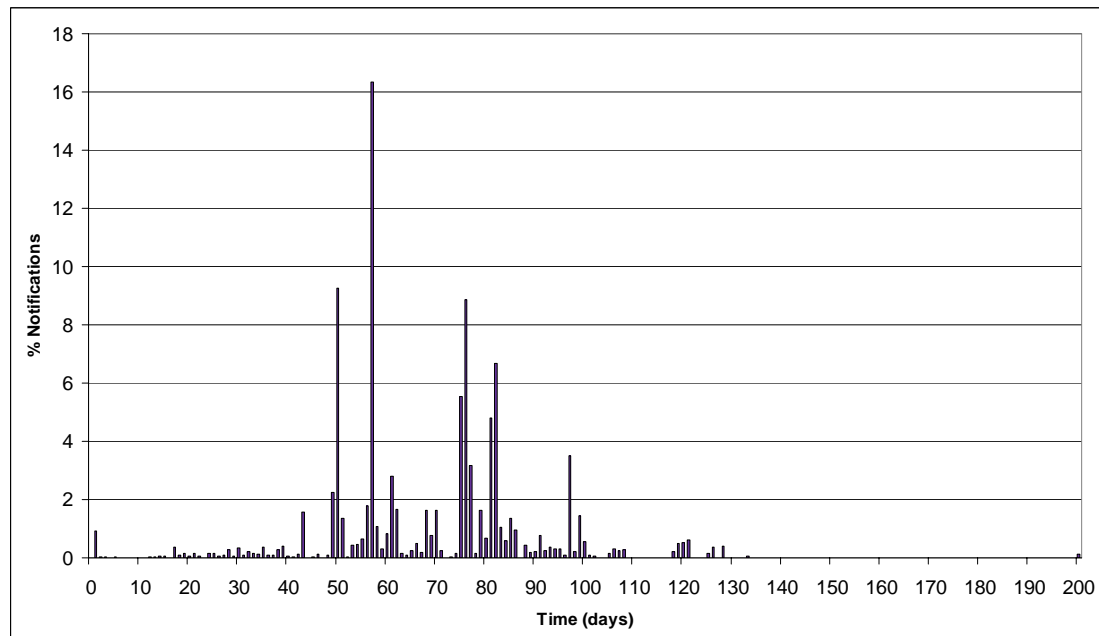
	Q3 2010	Q4 2010	Q1 2011	Q2 2011
% ≤ 4 days	92	88	79	61
% ≤ 1 day	70	69	49	36
Total CE Notns	336	347	971*	1761

* These data exclude 25 notifications that were reprinted at a later date, as part of investigations into a printing problem. The original printing dates are no longer available on the INS database.

4.1.2 Process timings – Routine notifications

Graph 4 shows statistics for notifications for Q2/2011 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.

Graph 4 Time taken to issue Acknowledgement Letters after receipt, Q2 2011



During Q1 and Q2 2011 there was a significant backlog in processing and issuing Certificates of Pharmaceutical Product (CPP). Staff from the Import Notifications group were allocated to assist in progressing CPP work. This resulted in a backlog in processing import notifications and this is reflected in processing times for import notifications (see Graph 4). Significant delays can also 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. As large spreadsheets take significant time for entry of data, this may cause delay to entry of other data.

There were 69 Objection with Reason letters issued in Q2 2011. The target for these critical letters is within 28 days from the date of acknowledgment, as specified by SI 2005/2789. All were assessed within 28 days of acknowledgment where acknowledgements were issued.

20 Further Information Request letters issued in Q2 2011 were not printed until 38 days after acknowledgment, although these were assessed within 28 days of acknowledgment (at 25 days). Administrative staff have been reminded of the need to issue letters promptly following assessment.

4.1.3 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. Some Further Information Request letter timings were out of compliance. Staff have been reminded of the necessity for compliance with timelines.

Efforts continue to try and reduce the time to enter data and issue acknowledgment letters, however significant delays have occurred due to redeployment of staff to other tasks during Q1 and Q2 2011. Delays may also occur where very large spreadsheets are submitted, as data entry takes time and acknowledgment letters are not issued until all items on the spreadsheet have been entered into the database.

5 Inspection liaison

Information in the form of listings of unlicensed products notified for import together with background information including any significant issues is routinely provided to support site inspections of MS and WL holders. Six routine inspections were supported in Q2 2011 and a number of Inspectorate general queries answered.

6 Conclusions

The Import Notification System is operating substantially within the requirements of SI 2005/2789, however some information request letters were issued beyond the 28 day deadline. Staff have been reminded of the need for compliance.

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.

Appendix II Safety Information Letters for Vitamin D (colecalciferol)

DRUG SAFETY INFORMATION

For immediate dissemination during working hours

Date: 23 January 2012

EL (12)A/03

Our Ref: MDR 39-01/12

Dear Healthcare Professional,

MHRA Safety Information for Dekristol (20,000 IU Colecalciferol) Capsules
(MIBE GMBH, Germany)

The above unlicensed product is imported in significant quantities into the UK.

Importers of medicines that are unlicensed in the UK must notify the MHRA in accordance with The Medicines for Human Use (Manufacturing, Wholesale Dealing and Miscellaneous Amendments) Regulations 2005/2789. For further information, please see also Guidance Note 14, available on the MHRA Website (<http://www.mhra.gov.uk>).

Notifications for importation of unlicensed medicines are assessed by the MHRA and objections may be raised where there are prohibitive safety or quality concerns, or in the case of non-objections to import, advice issued where users need to be aware of safety or quality issues.

Although importers are advised that the prescriber must be made aware that Dekristol capsules contain arachis (peanut) oil, and are contraindicated for patients with nut allergies, it has come to the attention of the MHRA that not all users may be aware of these safety issues. This is of particular concern because packs and leaflets are in the German language. Although there is currently no legal requirement for imported medicines to be labelled in English, the expectation in the National Health Service is that suitable English language labelling will be provided as a matter of good practice. NHS guidance has been issued which reflects this.

Allergy to arachis oil may lead to severe allergic reactions including anaphylaxis. Recipients are therefore asked to bring this information to the attention of relevant professionals.

Yours faithfully,

Graham Matthews

Senior Pharmaceutical Assessor, Unlicensed Medicines

DRUG SAFETY INFORMATION

For immediate dissemination during working hours

Date: 23 January 2012

EL (12)A/04

Our Ref: MDR 40-01/12

Dear Healthcare Professional,

MHRA Safety Information for Vigantoletten (1000 IU Colecalciferol) Tablets

(Merck Serono, Germany)

The above unlicensed product is imported in significant quantities into the UK.

Importers of medicines that are unlicensed in the UK must notify the MHRA in accordance with The Medicines for Human Use (Manufacturing, Wholesale Dealing and Miscellaneous Amendments) Regulations 2005/2789. For further information, please see also Guidance Note 14, available on the MHRA Website (<http://www.mhra.gov.uk>).

Notifications for importation of unlicensed medicines are assessed by the MHRA and objections may be raised where there are prohibitive safety or quality concerns, or in the case of non-objections to import, advice issued where users need to be aware of safety or quality issues.

Although importers are advised that the prescriber must be made aware that Vigantoletten tablets contain soya oil, and are contraindicated for patients with allergies to this ingredient, it has come to the attention of the MHRA that not all users may be aware of these safety issues. This is of particular concern because packs and leaflets are in the German language. Although there is currently no legal requirement for imported medicines to be labelled in English, the expectation in the National Health Service is that suitable English language labelling will be provided as a matter of good practice. NHS guidance has been issued which reflects this.

Allergy to soya oil may lead to severe allergic reactions including anaphylaxis. Recipients are therefore asked to bring this information to the attention of relevant professionals.

Yours faithfully,

Graham Matthews

Senior Pharmaceutical Assessor, Unlicensed Medicines