



Summary Report for Importation of Unlicensed Medicines

01 Jul 2015 – 30 Sep 2015

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1 Introduction and summary

This report¹ covers the period 01-July-2015 to 30-September-2015 and shows the import notification system to be operating substantially within the requirements of SI 2012/1916.

In this report a **News and current issues** section has been introduced as a means of informing importers and other interested parties of current issues.

¹ The data for this report were compiled on 29-Dec-2015 and reflect the Import Notification System at this date.

2 News and current issues

2.1 Immunotherapy SLIT products

In line with 2005 CSM/CHM advice, but taking into consideration subsequent changes in non-pollen Sublingual Immunotherapy (SLIT) products licensed within the EU, we have updated our stance on SLIT products and our current non-objection to import letters state:

There is no objection to the importation of unlicensed sublingual allergy desensitisation products for the use by NHS specialist clinics under specialist supervision only, and with access to resuscitation equipment.

Treatment with these products should be restricted to non-asthmatic adults only. Users are expected to record and report adverse drug reactions (ADRs).

our website now states:

In 2005, the Committee on Safety of Medicines (CSM, now Commission on Human Medicines, CHM) advised the MHRA that objection was not required to importation of unlicensed pollen-based SLIT products for use in non-asthmatic adults under the supervision of NHS specialists with access to resuscitation equipment. A number of non-pollen based SLIT products are now licensed within the EU (but not the UK) and the MHRA will now also not normally object to importation of these unlicensed products.

We will always endeavour to comply with CHM advice and do not currently intend to extend non-objections to include non-specialists, or other non-NHS specialists.

Rather than supply these products as unlicensed medicines we would encourage manufacturers to apply for Marketing Authorisations, where full assessment of safety, quality and efficacy may permit wider acceptable usage, as appropriate.

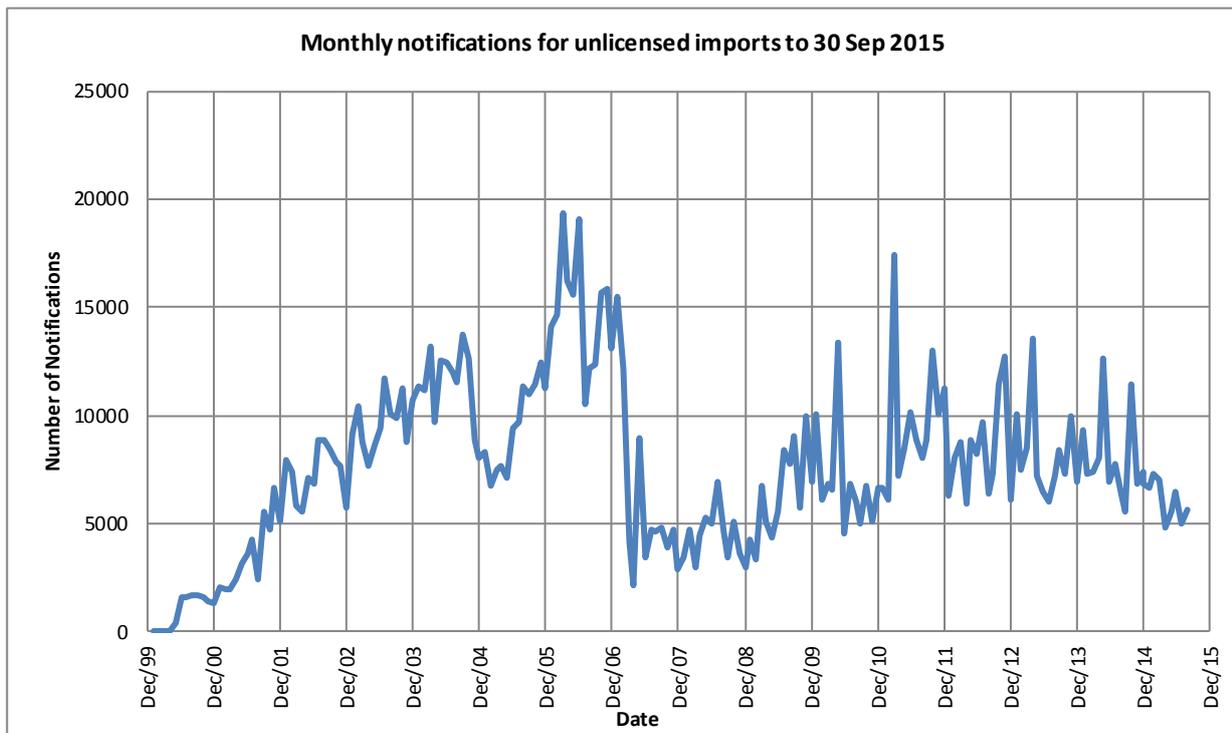
2.2 Manufacturers and sources of unlicensed medicines

Importers are reminded when notifying that if the person who will supply the medicinal product for importation is not the manufacturer or assembler, the name and address of the supplier must also be provided. Some importers have named a manufacturer and a country, but on query the manufacturer and supplier are in different countries, although no supplier has been named, only the country of supply, which is not that of the manufacturer. The MHRA assessment considers the manufacturer and the supplier and we need details of both. It is also helpful if details are provided of if and where the product is licensed.

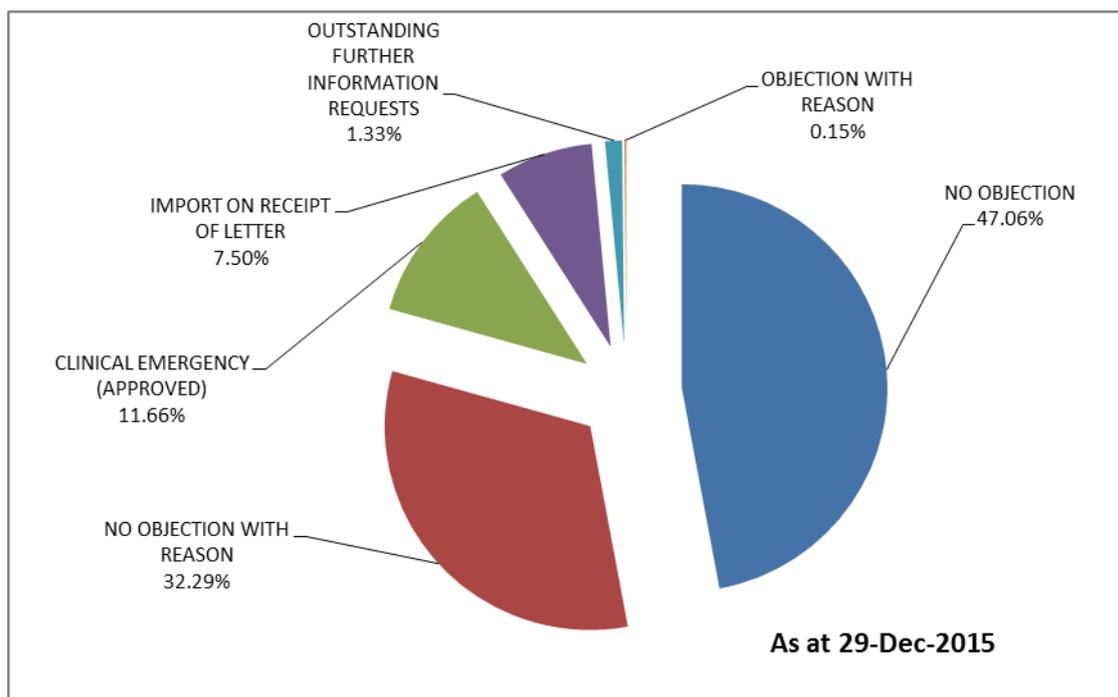
3 Notifications for importation

Graph 1 Monthly notifications for unlicensed imports

Note: Excludes invalid and cancelled notifications



Graph 2 Breakdown of valid notifications by status, 01 Jul – 30 Sep 2015



3.1 Importers

A total of 17028 notifications were received from 90 importers for the period 01 Jul 2015 to 30 Sep 2015. Of these, 8 importers accounted for approximately 74%.

Table 1 Valid notifications by importer 01 Jul 2015 to 30 Sep 2015

Rank	Importer Name	Importer Number	Number of Notifications	Percentage Share
1	Idis Limited	8733	4859	28.53%
2	U L Medicines Limited	31610	2420	14.21%
3	Mawdsley-Brooks & Company Limited	741	1281	7.52%
4	Durbin PLC	4321	982	5.77%
5	Waymade PLC	6464	970	5.70%
6	Alium Medical Limited	19054	867	5.09%
7	Emcure Pharma UK Limited	42117	600	3.52%
8	Bio Pathica Limited	15562	541	3.18%
9	Jolinda Medical Supplies Limited	18715	516	3.03%
10	Lexon (UK) Limited	15184	416	2.44%
11	Stallergenes (UK) Limited	36889	372	2.18%
12	Vertical Pharma Resources Limited	32879	288	1.69%
13	Imaging Equipment Limited	35903	239	1.40%
14	Clinigen Healthcare Limited	31644	226	1.33%
15	C.G.Murray & Son Limited	62918	172	1.01%
16	Guerbet Laboratories Limited	15363	160	0.94%
17	Higher Nature Limited	14689	144	0.85%
18	Diagenics Limited	15124	142	0.83%
19	Gowrie Limited	17481	136	0.80%
20	Alloga UK Limited	15694	122	0.72%
21	Mercury Pharmaceuticals Limited	12762	120	0.70%
22	Alk-Abello Limited	15082	113	0.66%
23	Pharma Nord UK Limited	15702	111	0.65%
24	Pharmasure Limited	18515	100	0.59%
25	Cyto-Solutions Limited	34178	97	0.57%
26	Immobilier France Ltd	32357	95	0.56%
27	GBUK Limited	33800	93	0.55%
28	Bio-Diagnostics Limited	10362	91	0.53%
29	Sai - Meds Limited	43435	91	0.53%
30	GE Healthcare Limited	221	65	0.38%
31	Helios Homoeopathy Limited	27776	53	0.31%
32	Springfield Pharmacy	19313	47	0.28%
33	Weleda UK Limited	298	46	0.27%
34	Smartway Pharmaceuticals Limited	42332	40	0.23%
35	Diagmed Healthcare Limited	42178	30	0.18%
36	Amgen Limited	13832	28	0.16%
37	Astrazeneca UK Limited	17901	27	0.16%
38	Pfizer Limited	57	24	0.14%
39	Dunelm Pharmaceuticals Limited	36892	22	0.13%
40	Creo Pharma Limited	31862	20	0.12%
41	Dr Reckeweg (UK) Limited	16135	17	0.10%
42	Allergy Therapeutics (UK) Limited	17087	16	0.09%
43	Genzyme Therapeutics Limited	27587	16	0.09%

Rank	Importer Name	Importer Number	Number of Notifications	Percentage Share
44	B Braun Medical Limited	4296	15	0.09%
45	Sigma Pharmaceuticals PLC	8778	15	0.09%
46	Andersonbrecon (UK) Limited	11724	13	0.08%
47	Sanochemia Diagnostics UK Limited	19088	11	0.06%
48	Mr Alan Broch	5954	10	0.06%
49	Alliance Medical Limited	34938	9	0.05%
50	Movianto Ireland	8432	9	0.05%
51	Bayer PLC	10	8	0.05%
52	Medisource (N.I.) Limited	35105	8	0.05%
53	Almac Clinical Services Limited	20377	7	0.04%
54	Janssen-Cilag Limited	242	7	0.04%
55	Packpharm Limited	13163	7	0.04%
56	Tri Health Care Limited	32326	7	0.04%
57	Abbvie Limited	41042	6	0.04%
58	Komtur Pharmaceuticals UK Limited	34040	5	0.03%
59	NHS Blood And Transplant	25224	5	0.03%
60	Public Health England	42195	5	0.03%
61	Fisher Clinical Services UK Limited	18693	4	0.02%
62	Fresenius Kabi Limited	8828	4	0.02%
63	McGregor Cory Limited	14238	4	0.02%
64	OPD Laboratories Limited	15814	4	0.02%
65	Teva UK Limited	289	4	0.02%
66	American Biochemical And Pharmaceuticals Limited	27797	3	0.02%
67	Biotec Services International Limited	19819	3	0.02%
68	Biotest (UK) Limited	10826	3	0.02%
69	Catalent UK Packaging Limited	1380	3	0.02%
70	Celgene Limited	31296	3	0.02%
71	Pharmacy2u Limited	35323	3	0.02%
72	Summer Healthcare Limited	33948	3	0.02%
73	Alan Spivack Limited	4637	2	0.01%
74	Baxalta UK Limited	44042	2	0.01%
75	Merck Sharp & Dohme Limited	25	2	0.01%
76	Mistry Medical Supplies Limited	31315	2	0.01%
77	Quotient Clinical Limited	35718	2	0.01%
78	Roche Products Limited	31	2	0.01%
79	Sigma-Tau Pharma Limited	29808	2	0.01%
80	Baxter Healthcare Limited	116	1	0.01%
81	Bristol-Myers Squibb Pharm. Ltd.	11184	1	0.01%
82	Diagnostic Imaging Limited	27376	1	0.01%
83	European Nutripharm Limited	19441	1	0.01%
84	Kings College Hospital NHS Foundation Trust	21416	1	0.01%
85	Logixx Pharma Solutions Limited	36959	1	0.01%
86	Merz Pharma UK Limited	20286	1	0.01%
87	Miller & Miller (Chemicals) Limited	6647	1	0.01%
88	P & D Pharmaceuticals Limited	12204	1	0.01%
89	Phoenix Healthcare Distribution Ltd.	963	1	0.01%
90	Woolpit Medical Services Limited	18643	1	0.01%
		Sum:	17028	100.00%

3.2 Countries of export of products

Table 2 Countries of export 01 Jul 2015 to 30 Sep 2015

Rank	Exporting Country	Number of Notifications	%Share
1	United States of America	3632	21.33%
2	Germany	3451	20.27%
3	France	1658	9.74%
4	India	1536	9.02%
5	Spain	1290	7.58%
6	Italy	1214	7.13%
7	Canada	939	5.51%
8	Australia	713	4.19%
9	Switzerland	517	3.04%
10	Belgium	444	2.61%
11	Japan	277	1.63%
12	The Netherlands	245	1.44%
13	Denmark	191	1.12%
14	Hungary	144	0.85%
15	Austria	119	0.70%
16	Poland	108	0.63%
17	Republic of Ireland	105	0.62%
18	Czech Republic	90	0.53%
19	Sweden	89	0.52%
20	Norway	84	0.49%
21	Portugal	80	0.47%
22	Turkey	48	0.28%
23	Finland	28	0.16%
24	Cyprus	8	0.05%
25	Greece	8	0.05%
26	New Zealand	5	0.03%
27	Costa Rica	3	0.02%
28	Taiwan	2	0.01%
	Sum:	17028	100%
	EEA	9356	55%
	Non-EEA	7672	45%

3.3 Most frequently notified products

Table 3 Top 50 frequently notified products 01 Jul 2015 to 30 Sep 2015

Rank	Product Name	Number of Notns	% all Notns
1	Homoeopathics & Herbals	926	5.44%
2	Thyroid Oral Preps	901	5.29%
3	Melatonin Oral Preps	761	4.47%
4	Carmustine 100 mg Pow/Soln For Inj	700	4.11%
5	Benzathine Benzylpenicillin Injections	637	3.74%
6	BCG Instillations And Vaccines	635	3.73%
7	Allergy Tests	566	3.32%
8	Sodium Salicylate 175mg Tablets	416	2.44%
9	Sodium Nitroprusside 50mg Inj/Infn	386	2.27%
10	Vitamins - Oral Preps	373	2.19%
11	Tretinoin/Vitamin A & Hydroquinone Topicals (Creams Oints., Gels Etc.)	353	2.07%
12	Fumaric Acid Esters 30 &120mg Tablets	254	1.49%
13	Carfilzomib 60 mg Lyophilized Inj	242	1.42%
14	Lu-Dota, Tyr Ocfreotate, Lutetium-177 (¹⁷⁷ Lu) Labelled	234	1.37%
15	Pirenzepine 50mg Tablets	216	1.27%
16	Acetylcysteine Oral Preps	205	1.20%
17	TAS-102 (Trifluridine/Tipiracil) 20mg Tablets	201	1.18%
18	Betamethasone Injections	186	1.09%
19	Bisacodyl Enemas 10mg	180	1.06%
20	Diphenoxylate & Atropine Tabs	176	1.03%
21	Povidone-Iodine 50 mg/MI Soln For Inj	168	0.99%
22	Ramucirumab Infusion Solutions	163	0.96%
23	Vinorelbine Tartrate 20 & 30 mg Capsules	160	0.94%
24	Suxamethonium Injections	152	0.89%
25	Allergy Treatments (SCIT & SLIT)	152	0.89%
26	Oral Magnesium Preps	148	0.87%
27	Progesterone Creams	144	0.85%
28	Dehydroepiandrosterone (DHEA) Oral Preps	143	0.84%
29	Melphalan 50 mg Pow/Sol For Inj/Inf	137	0.80%
30	Metolazone Tablets All Strengths	130	0.76%
31	Ibrutinib 140 mg Capsules	122	0.72%
32	Clonidine Transdermal Patches	118	0.69%
33	Fosfomycin Oral Preps	113	0.66%
34	Patent Blue V 2.5% Solution	110	0.65%
35	Mexiletine Capsules All Strengths	109	0.64%
36	Sucralfate Oral Preps	109	0.64%
37	Triamcinolone Acetonide, Neomycin Sulfate, Nystatin, Gramicidin Ear Oint	109	0.64%
38	Human Chorionic Gonadotrophin 5000 IU	100	0.59%
39	Talc For Pleurodesis	93	0.55%
40	Co-Trimoxazole Injections & Infusions	88	0.52%
41	Povidone-Iodine Topical Preps	86	0.51%
42	Insulin Preps (Human)	82	0.48%
43	Ketamine Injections	82	0.48%
44	Indigo Carmine Injections	81	0.48%
45	Saline In Glass	80	0.47%
46	Coenzyme Q10 Oral Preps	77	0.45%
47	Vitamins, Parenteral	76	0.45%
48	Probenecid 500mg Tablets	75	0.44%
49	Absorbable Gelatin Sponge	72	0.42%
50	Brivaracetam 10 & 25mg Tablets	72	0.42%

3.4 Vaccines and immunoglobulins

Table 4 Vaccines & immunoglobulins 01 Jul 2015 to 30 Sep 2015

Rank	Non-Proprietary Product Name	Number of Notifications
1	BCG Vaccines & Instillations	635
2	Tuberculin Purified Protein Derivative RT 23 SSI 2 T.E/0.1ml Inj	26
3	Diphtheria + Tetanus + Pertussis + Poliomyelitis Vaccine PFS	12
4	Diphtheria + Tetanus + Pertussis + Polio + Haemophilus Influenzae Type B Pdr & Susp For Inj	8
5	Influenza Vaccine (Surface Antigens, Inactivated) Suspension For Injection	8
6	Diphtheria + Tetanus + Pertussis + Poliomyelitis Vaccine PFS	6
7	Diphtheria, Tetanus, Acellular Pertussis,Hep B, IPV, HIB PFS	2
8	IgM Enriched Normal Human Immunoglobulin Solution For Infusion 5%	2
9	Meningitis C Injection	2
10	Rabies Immunoglobulin 150 IU/ml Injection	2
11	Antithymocyte Immunoglobulin (Horse) Conc Soln For Inj 250mg/5ml	1
12	CMV Immunoglobulin 5% Infn Soln 100IU/ml	1
13	Polio Vaccine Inactivated Injection	1
14	Tetanus Immunoglobulin 250 IU/ml Injection	1

3.5 Shortages

Table 5. Products notified claiming UK product shortages, 01 Jul 2015 to 30 Sep 2015

NOTE: This listing is indicative only and not exhaustive. It is based upon text comments in the imports database.

Non-Proprietary Name	Number of Notifications
BCG Vaccines & Instillations	635
Diphenoxylate HCl+Atropine Sulfate Tab 2.5+0.025mg	176
Vinorelbine Tartrate 20 & 30 mg Soft Gel Capsules	160
Betamethasone 4mg/1ml Injection Solution	158
Suxamethonium Injections	152
Sucralfate Oral Preps	109
Human Chorionic Gonadotrophin 5000 IU	100
Co-Trimoxazole Injection 480mg/5ml	88
Potassium Chloride 600 mg SR Caps/Tabs	68
Dexbrompheniramine Maleate And Pseudoephedrine Sulfate 6mg/120mg Tabs	60
Ketamine Injections	59
Iobitriodol 300mg Iodine Per ml	50
Haloperidol 5mg/ml Injection Soln	28
Megestrol Acetate 160 mg Tablets	27
Tuberculin PPD	26
Hygroton Tablet 25 & 50mg	24
Liothyronine Tablets	17

Non-Proprietary Name	Number of Notifications
Trifluoperazine 1mg Tablets	17
Demeclocycline 150mg Tabs	16
Disulfiram 500 mg Tablets	16
Melphalan 50mg Injection	14
Methotrexate 5 mg/2 ml Inj	14
Perphenazine Tablets 2 & 4 mg	13
Ribavirin For Inh Soln 6g	11
Levothyroxine Tabs	10
Etoposide 100mg/5ml Conc For Infn Soln	9
Clonidine Hydrochloride 150 mcg/ml Sol For Inj/Infus	8
Dibotermine Alfa 12 mg Kit For Implant	8
Phenoxybenzamine Hydrochloride Caps 10mg	8
Promazine 25 mg Tablets	8
Nandrolone Decanoate 50 mg/ml Injection	7
Dihydroergotamine Mesylate Injection 1mg/ml	6
Diphtheria + Tetanus + Pertussis + Poliomyelitis Vaccine PFS	6
Milrinone Injection 1mg/ml	6
Hyoscine Transdermal Patches	4
Pyrimethamine 25mg Tablets	4
Diclofenac Dispersible Tabs 50mg	3
Diphtheria + Tetanus + Pertussis + Poliomyelitis Vaccine 0.5ml PFS	3
Synthetic Vasopressin Conc For Sln For Injection 20u/ml	2
Amino Acid Solution For Infusion	1
Carnitine 1.5g/5ml Oral Solution	1
Chloramphenicol Sodium Succinate 1 G Powder For Injection	1
Cosyntropin Zinc Hydroxide Depot 1 mg/ml Injection Suspension	1
Etoposide 50 mg Capsules	1
Labetalol 100mg/20ml Sln For Inj/Inf	1
Sulfinpyrazone 200 mg Tablets	1

4 Administrative matters

4.1 Process timings – Clinical Emergencies

Normally, Clinical Emergency notifications can be processed within one working day. This can be up to four calendar days or longer if the notification is received on a Friday afternoon or before a public holiday. Some notifications can take longer if there are queries, if a large number have been submitted, or if a medical assessment is required. Notifications originally submitted as non-emergencies may be processed urgently resulting from changes in circumstances. These will show as extended processing times. Graph 3 and Table 6 provide further information on timings.

Graph 3 Time to Issue Clinical Emergencies, 01 Jul 2015 to 30 Sep 2015

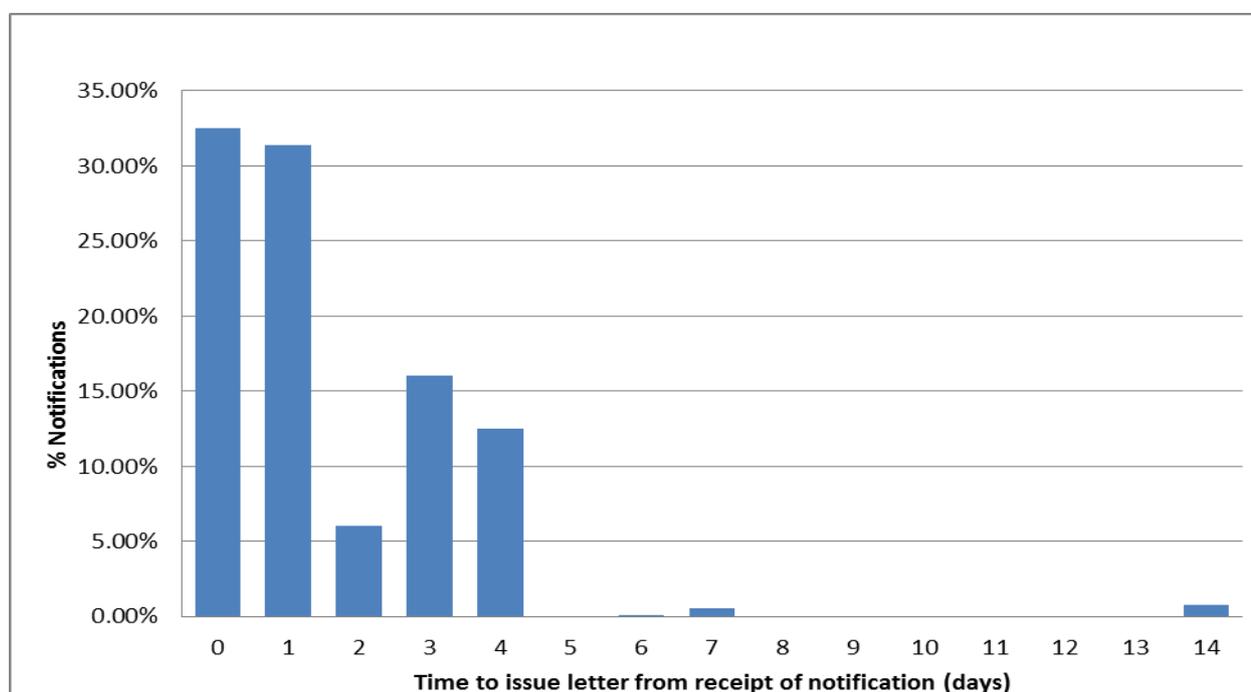


Table 6 Clinical Emergency Letter Timings, 01 Jul 2015 to 30 Sep 2015

Time to Issue Final Letter from Submission Date (days)	Number of Notifications	% Notifications	Comments
0	645	32.51%	32.51% issued on same day as received
1	623	31.40%	63.91% issued within 1 day
2	120	6.05%	69.96% issued within 2 days <ul style="list-style-type: none"> 53 queried due to quantity 20 queried due to an incorrect product code 20 queried due to future dating 27 queried due to Centrally Authorised licence
3	319	16.08%	86.04% issued within 3 days <ul style="list-style-type: none"> 144 delayed due to slow system performance 205 received on Fridays and letters issued on Mondays

Time to Issue Final Letter from Submission Date (days)	Number of Notifications	% Notifications	Comments
4	248	12.50%	98.54% issued within 4 days <ul style="list-style-type: none"> • 166 delayed due to slow system performance • 80 not notified as urgent, but escalated on DH request • 1 notified as non-UK supply, but with letter from UK prescriber – new non- objection letter was issued • 1 mail system problems
6	2	0.10%	<ul style="list-style-type: none"> • Incoming e-mail not marked as URGENT in header but escalated on reading body text
7	11	0.55%	<ul style="list-style-type: none"> • 10 received on 03-Jul, but dated for 09-Jul. Letters issued on 10-Jul. • 1 incorrectly dated on entry (was in fact processed on day of receipt)
14	16	0.81%	<ul style="list-style-type: none"> • Not originally notified as urgent, but escalated on importer's request.
Totals	1984	100%	

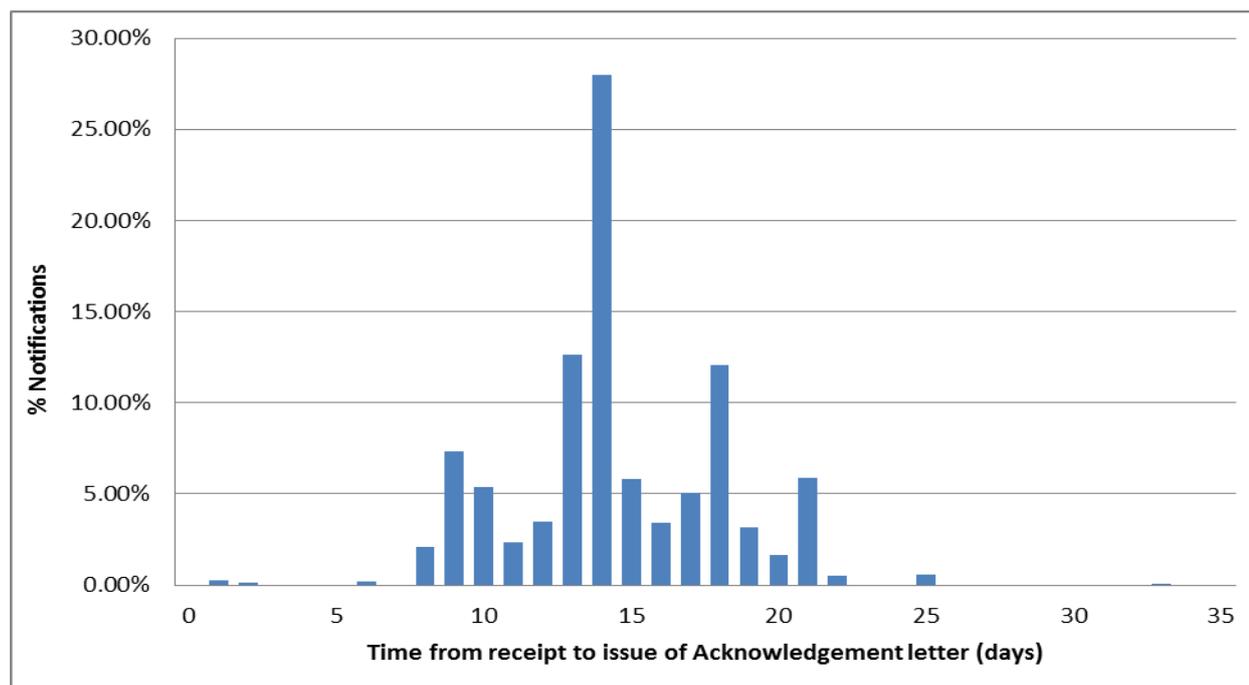
4.2 Process timings – Routine notifications

Graph 4 shows statistics for 1815 notifications for Q3/2015 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.

Significant delays can be experienced due to the necessity to obtain additional information from some importers to enable completion of data entry. Where spreadsheets have been submitted containing very large numbers of notifications there may also be delays due to the time taken to enter the data before acknowledgement letters can be issued.

Approximately 99% of acknowledgements were issued within 21 days of receipt of notifications.

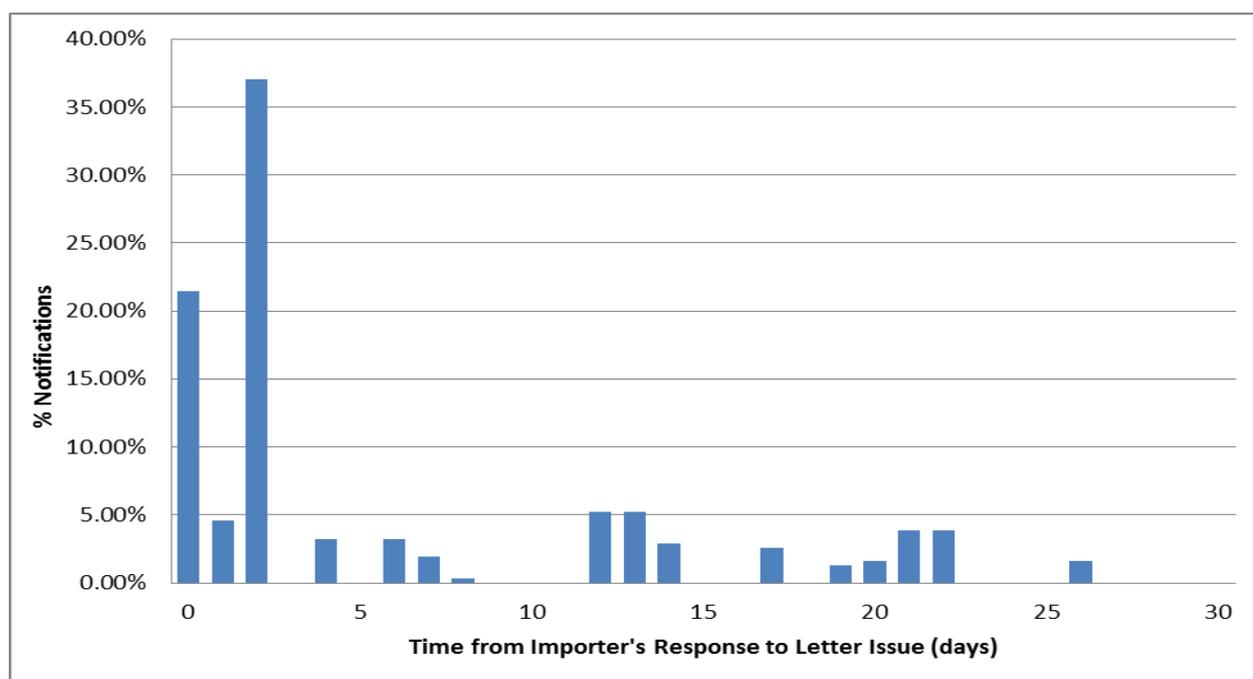
Graph 4 Time to issue Acknowledgements, 01 Jul 2015 to 30 Sep 2015



4.3 Process timings - Further information request responses

Importers responded to 308 requests for further information from the MHRA in Q3/2015 where letters permitting import were subsequently issued. Approximately 85% of these final letters were issued within 14 days of receiving the importer's response. See Graph 5.

Graph 5 Response times to further information provided, 01 Jul 2015 to 30 Sep 2015



4.4 Process timings – Objection letters

A total of 26 Objections with Reasons were issued in Q3/2015. Of these, 3 were issued where acknowledgements had previously been issued. Each of these Objection with Reason letters was issued within 28 days of acknowledgement.

4.4.1 Summary of reasons for objections to import

Table 7 Reasons for objection to import

Summary	Number of notifications
Centrally Authorised product available	12
UK licensed product available	11
Importer's licence not valid for activity	2
Excessive quantity over that permitted in SI 2012/1916	1

We continue to receive notifications for import of Centrally Authorised products as unlicensed medicines. Centrally Authorised products possess a Marketing Authorisation ("licence") valid in all Member States and are NOT unlicensed medicines. They cannot be notified for import as unlicensed medicines. Unlicensed equivalents can only be considered for import where no centrally authorised product is available within the EEA that can meet the patient's clinical needs.

In general, an unlicensed medicine must not be supplied if there is an equivalent licensed product available that can meet the patient's clinical needs. This may be a UK licensed product available within the UK or, as above, a Centrally Authorised product available within the EEA.

Importers are reminded that importation of unlicensed medicines requires a Wholesale Dealer's Authorisation (WDA(H)) for import from within the EEA and a Manufacturer's "Specials" Licence (MS) for import from outside the EEA. In each case the licence must be enabled to permit this activity by specifically selecting the appropriate options when applying for the licence.

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 WDA(H) holders and to assist Enforcement investigations. Six inspections were supported in Q3/2015 and a number of Inspectorate and Enforcement general queries answered. The Pharmaceutical Assessor for imported unlicensed medicines was pleased to attend two inspections in person to provide advice and support.

6 Conclusions

The import notification system has operated substantially within the requirements of the regulations during Quarter 3, 2015.