Medicines & Healthcare products Regulatory Agency

MHRA
Regulating Medicines and Medical Devices

Summary Report for Importation of Unlicensed Medicines

01 Jul 2016 – 30 Sep 2016

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Contents

1 Introduction and summary

This report[1] covers the period 01-Jul-2016 to 30-Sep-2016 and shows the import notification system to be operating substantially within the requirements of SI 2012/1916.

[1] The data for this report were compiled in January 2017 and reflect the Import Notification System at this date.

2 News and current issues

The following issues are highlighted as a result of objections to import raised during this Quarter:

The maximum quantity notified for import in a single notification for import of unlicensed medicines may be 25 individual doses or a quantity that must not exceed that required for 25 courses of no more than 3 months.

Unlicensed medicines 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 a Centrally Authorised product available within the EEA.

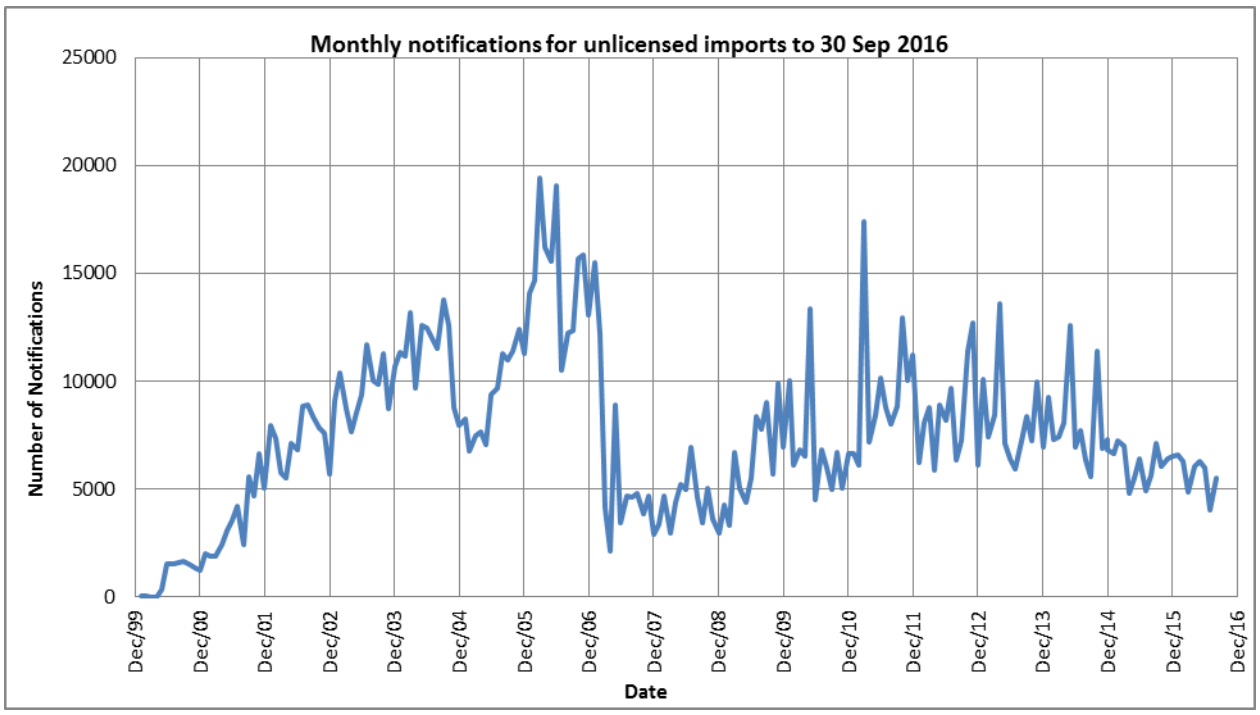
For import of unlicensed medicines from within the European Economic Area (EEA) a Wholesale Dealer's Authorisation for human medicines (WDA(H)) is required and for import from outside the EEA a Manufacturer's "Specials" licence (MS) is required. In each case the licence must be specifically enabled for the activity.

Unlicensed medicine may be supplied to meet the special needs of individual patients. Special needs must be medical in nature and unable to be met by an available equivalent licensed product. Cosmetic use is therefore not an admissible special need. Skin lightening products are a particular area of interest in that genuine cases of melasma may require clinical intervention, but many skin lightening procedures are in fact cosmetic in nature. Similarly, sclerosing agents may be used for clinically significant varicosities and irritable thread veins, but use of unlicensed medicines for cosmetic procedures is not acceptable.

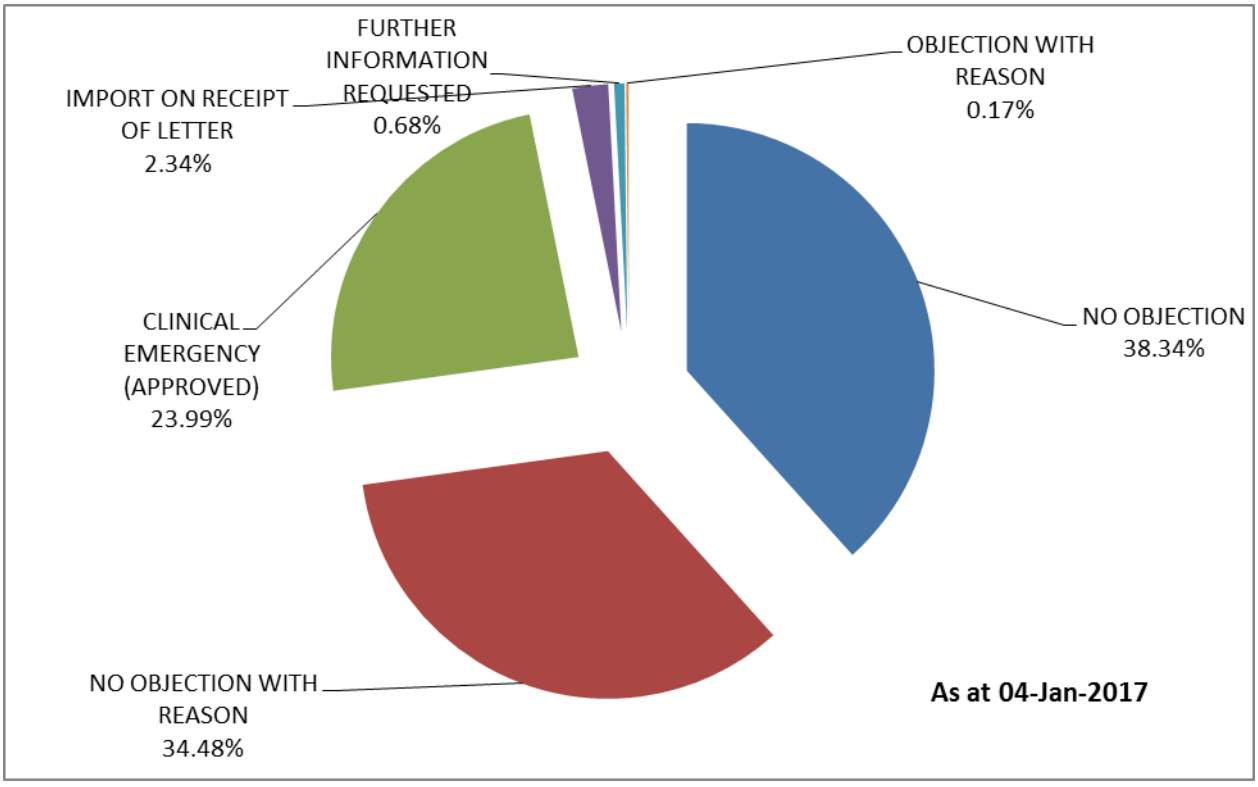
3 Notifications for importation

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 2016



3.1 Importers

A total of 15545 notifications were received from 88 importers for the period 01 Jul 2016 to 30 Sep 2016. Of these, 7 importers accounted for approximately 74%.

Table 1 Valid notifications by importers 01 Jul 2016 to 30 Sep 2016

Importer Details	Number of Notifications	Percentage Share
88 importers	15545	100%
Of which 7 importers	11449	~74%

3.2 Countries of export of products

Table 2 Countries of export 01 Jul 2016 to 30 Sep 2016

Rank	Exporting Country	Number of Notifications	Percentage Share
1	Germany	3358	21.60%
2	United States of America	2528	16.26%
3	Italy	2178	14.01%
4	Canada	1226	7.89%
5	India	1041	6.70%
6	France	938	6.03%
7	Spain	731	4.70%
8	Australia	507	3.26%
9	Belgium	408	2.62%
10	Switzerland	403	2.59%
11	Austria	383	2.46%
12	Denmark	317	2.04%
13	Norway	316	2.03%
14	Poland	212	1.36%
15	The Netherlands	208	1.34%
16	Japan	140	0.90%
17	Hungary	102	0.66%
18	Argentina	81	0.52%
19	New Zealand	80	0.51%
20	Sweden	73	0.47%
21	Greece	70	0.45%
22	Slovenia	60	0.39%
23	Czech Republic	42	0.27%
24	South Korea	41	0.26%
25	Finland	32	0.21%
26	Portugal	30	0.19%
27	Lithuania	22	0.14%
28	Iceland	6	0.04%
29	Republic of Ireland	6	0.04%

Rank	Exporting Country	Number of Notifications	Percentage Share
30	Bulgaria	2	0.01%
31	Singapore	2	0.01%
32	Costa Rica	1	0.01%
33	South Africa	1	0.01%
	Sum:	**15545**	**100.00%**
	EEA	**9494**	**61.07%**
	Non-EEA	**6051**	**38.93%**

3.3 Most frequently notified products

Table 3 Top 50 frequently notified products 01 Jul 2016 to 30 Sep 2016

Rank	Product Name	Number of Notifications	% all Notifications
1	Progesterone Injections	1239	7.97%
2	Thyroid Oral Preparations	1132	7.28%
3	Bacillus Calmette Guerin (BCG) Instillations and Vaccines	1008	6.48%
4	Homoeopathics	847	5.45%
5	Sucralfate Oral Preparations	522	3.36%
6	Vitamins - Oral	397	2.55%
7	Allergy Tests	336	2.16%
8	Melatonin Oral Preparations	286	1.84%
9	Mexiletine Capsules All Strengths	279	1.79%
10	Bleomycin 15000 IU Injections	265	1.70%
11	Bisacodyl Enemas	231	1.49%
12	Nabilone 1 mg Capsules	227	1.46%
13	Tretinoin/Vitamin A and Hydroquinone (All Combinations) Topicals (Creams Oints., Gels etc.)	224	1.44%
14	Ixazomib Tablets & Caps	221	1.42%
15	Sodium Chloride Parenterals	208	1.34%
16	Talc For Pleurodesis	192	1.24%
17	Benzathine Benzylpenicillin Injections	167	1.07%
18	Acetylcysteine Oral Preparations	166	1.07%
19	Clindamycin Suspension 75mg/5ml	162	1.04%
20	Sodium Nitroprusside 50mg Pow/Soln For Inj	151	0.97%
21	Venetoclax Tablets All Strengths	136	0.87%
22	Co-Trimoxazole Injections & Infusions	135	0.87%
23	Pirenzepine 50mg Tablets	133	0.86%
24	Lu-Dota, Tyr Ocfreotate, Lutetium-177 (177 Lu) Labelled	130	0.84%
25	Daratumumab Infusions	96	0.62%
26	Tuberculin PPD	94	0.60%
27	Iloprost Injections/Infusions	93	0.60%
28	Melphalan 50 mg Injections	93	0.60%
29	Betamethasone Injections	92	0.59%
30	Triamcinolone , Gramicidin, Neomycin, Nystatin Otic Ointments	84	0.54%
31	Flunarizine 5 mg Tablets	81	0.52%
32	Indigo Carmine Injections	80	0.51%
33	Pentosan 50 & 100 mg Capsules	80	0.51%
34	Nadolol 40 & 80 mg Tablets	79	0.51%
35	Fumaric Acid Esters 30 &120mg Tablets	75	0.48%
36	Vitamins - Parenteral	74	0.48%
37	Metolazone 5 mg Tablets	70	0.45%
38	Potassium Canrenoate 200mg/10ml Injection	70	0.45%
39	Ubidecarenone Oral Preparations	70	0.45%

Rank	Product Name	Number of Notifications	% all Notifications
40	Cabozantinib Tabs All Strengths	66	0.42%
41	Insulin (Human Regular) 500 Units/ml Injection	66	0.42%
42	Brivaracetam 25mg Tablets	65	0.42%
43	Glutathione 600mg/4ml Injections	64	0.41%
44	Tolvaptan 15 & 30mg Tabs	62	0.40%
45	Isoprenaline 0.2 mg/ml Injections	60	0.39%
46	Povidone-Iodine 50 mg/ml Soln For Inj	60	0.39%
47	Potassium Citrate Oral Preparations	58	0.37%
48	Albendazole 400mg Tablets	56	0.36%
49	Potassium Chloride 600 mg SR Tabs & Caps	55	0.35%
50	Co-Phenotrope (Diphenoxylate Hydrochloride + Atropine Sulfate) 2.5 mg + 25 mcg Tablets	51	0.33%
	Sum	**15545**	**68.76%**

3.4 Vaccines and immunoglobulins

Table 4 Vaccines & immunoglobulins 01 Jul 2016 to 30 Sep 2016

Rank	Product Name	Number of Notifications
1	Bacillus Calmette Guerin (BCG) Vaccines & Instillations	1008
2	Tuberculin PPD	94
3	Meningococcal Group A, C, W135 And Y Conjugate Vaccine	16
4	Inactivated Hepatitis A Vaccine	9
5	Lymphocyte Immune Globulin Anti Thymocyte Globulin (Equine) 50 mg/ml Injection Soln	9
6	Haemophilus Influenzae Type B Vaccine	4
7	Yellow Fever Vaccine (Live)	4
8	IgM Enriched Normal Human Immunoglobulin Solution For Infusion 5%	2
9	Poliomyelitis Vaccine Inactivated	1
10	Rotavirus Vaccine (Live, Oral Pentavalent Vaccine)	1
11	Typhoid Vaccine (Vi Capsular Polysaccharide) 25 mcg/0.5 ml Injection	1

3.5 Shortages

Table 5. Products notified claiming UK product shortages, 01 Jul 2016 to 30 Sep 2016

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

Proprietary Name	Number of Notifications
Bacillus Calmette Guerin (BCG) Instillations and Vaccines	1007
Progesterone Injections	554
Sucralfate Oral Preparations	460
Bleomycin 15000 IU Injections	233
Nabilone 1 mg Capsules	227
Co-Trimoxazole Injections & Infusions	125
Tuberculin PPD 5 IU/0.1ml Injections	94
Potassium Chloride 600 mg SR Tabs & Caps	55
Co-Phenotrope (Diphenoxylate Hydrochloride + Atropine Sulfate) 2.5 mg + 25 mcg Tablets	43
Liothyronine 0.02 & 0.025 mg Tablets	42

Proprietary Name	Number of Notifications
Human Chorionic Gonadotrophin 5000 IU	40
Acenocoumarol 1 & 4 mg Tablets	38
Mivacurium Chloride 2 mg/ml Injections	31
Cytarabine 100 mg/5 ml Inj	29
Dexamethasone 4 mg Tablets	24
Magnesium Sulfate Heptahydrate Injections	24
Phentolamine 10mg/ml Injection	22
Etoposide Injections/Infusions 100mg	20
Rifampicin 150 mg Capsules	20
Amiodarone Hydrochloride 100 & 200 mg Tablets	16
Trifluoperazine 1 & 5 mg Tablets	12
Fludrocortisone Acetate 0.1 mg Tablets	11
Etomidate 2mg/ml Inj Soln	10
Digoxin 0.25 mg/ml Injection	9
Aspirin Suppositories 300mg	8
Doxazosin 4mg Prolonged Rel Tabs	8
Melphalan Inj 50mg/10ml	8
Flucytosine Inj 2.5g/50ml	7
Glibenclamide Tabs 5mg	6
Betamethasone Disodium Phosphate 4mg/ml Inj Soln	4
Hydroxyzine Hydrochloride 2 mg/ml Syrup	4
Levothyroxine 50mcg Tablets	4
Lorazepam 2 & 4 mg/ml Injections	4
Naloxone Hydrochloride Inj Sln 0.4mg/ml	4
Perphenazine 2 & 4mg Tablets	4
Tetracosactide 250mcg/ml Injection	4
Dihydroergotamine Injection 1mg/ml	3
Hepatitis A Vaccine Inactivated	3
Itraconazole IV 250 mg/25 ml Infusion	3
Disulfiram 250mg Tablets	2
Ketamine 200mg/2ml Inj Sln	2
Nadolol 80mg Tabs	2
Tioguanine 40 mg Tablets	2
Aztreonam Injection 1 G	1
Chloromycetin Succinate 1 G Powder For Inj	1
Haloperidol 5mg/ml Injection Soln	1
Human Albumin 20% Inn	1
Nandrolone Decanoate Injection 50mg/ml	1
Vasopressin 20 Pressor Units Injection	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 2016 to 30 Sep 2016

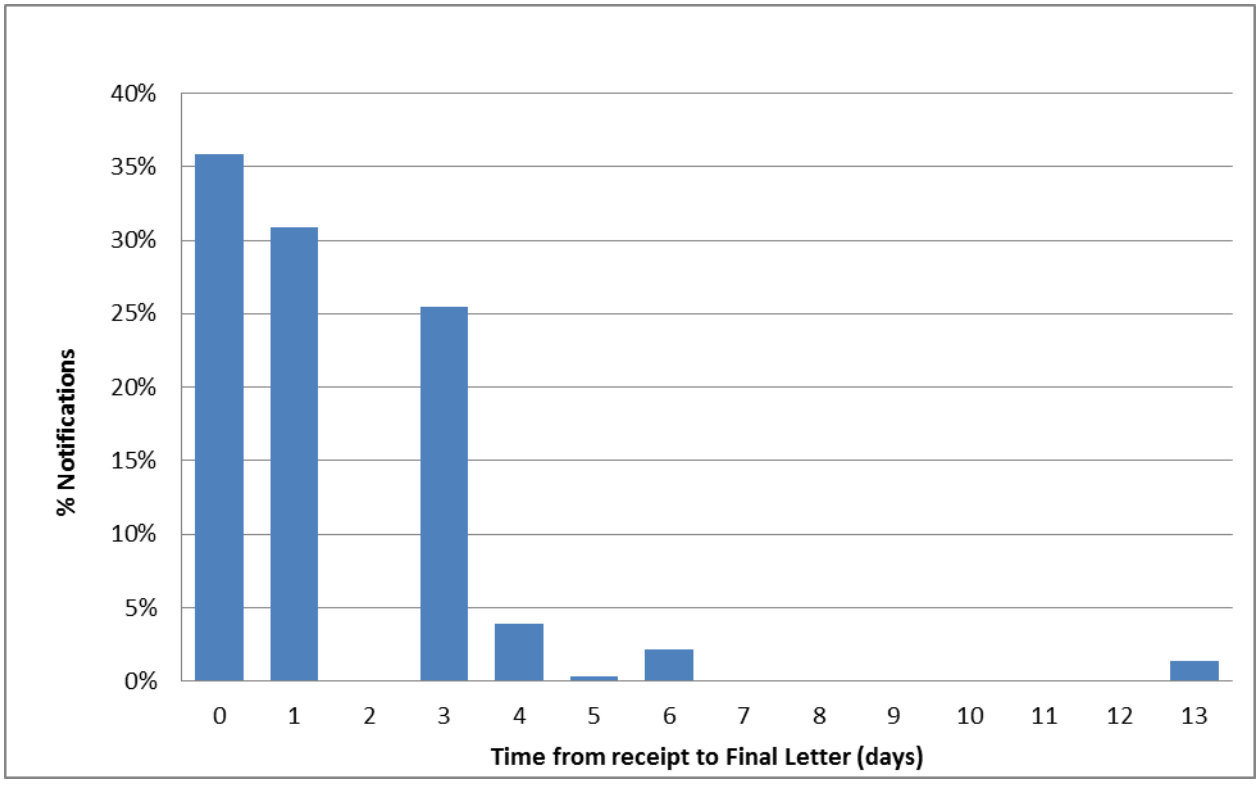


Table 6 Clinical Emergency Letter Timings, 01 Jul 2016 to 30 Sep 2016

Time to Process from Receipt	Number of Notifications	% Notifications
≤ 1day	66.73%	issued within 1 day
≤ 3 days	92.28%	issued within 3 days
Totals	**3730**	**100%**

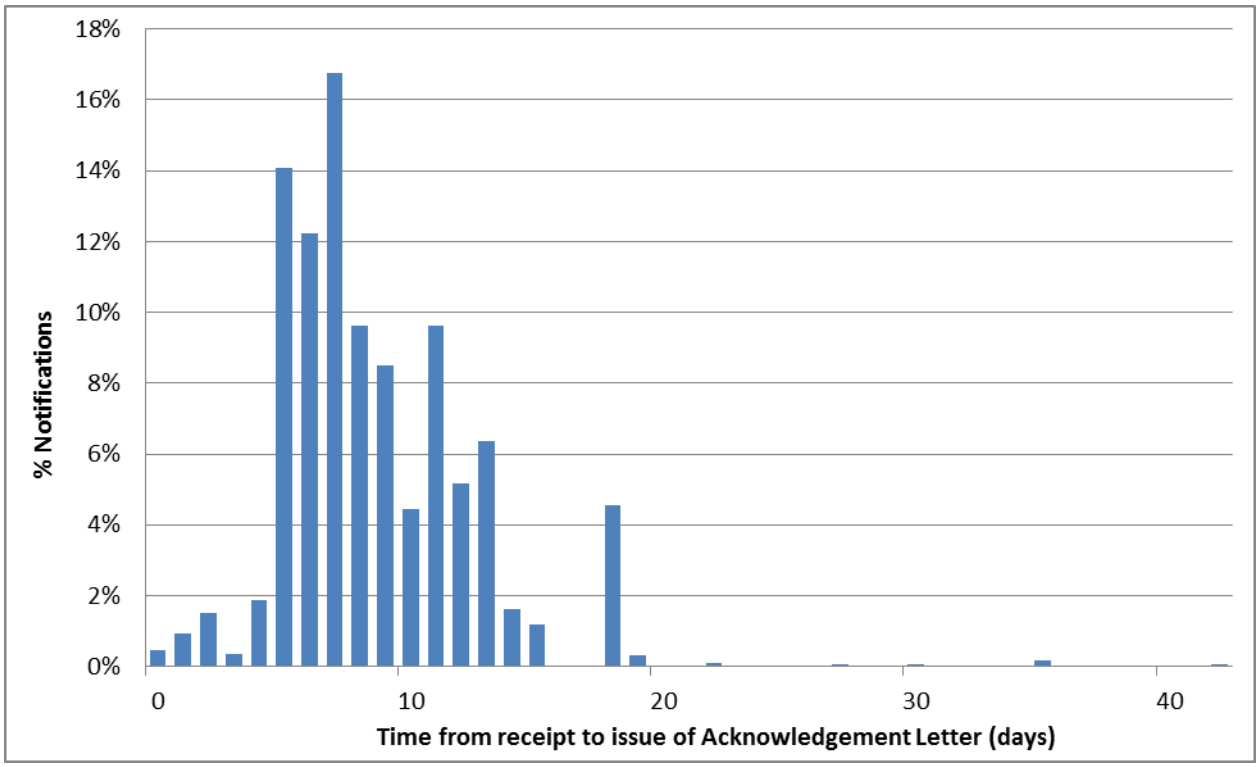
4.2 **Process timings – Routine notifications**

Graph 4 shows statistics for 1932 notifications for Q3/2016 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 90% of acknowledgements were issued within 13 days of receipt of notifications.

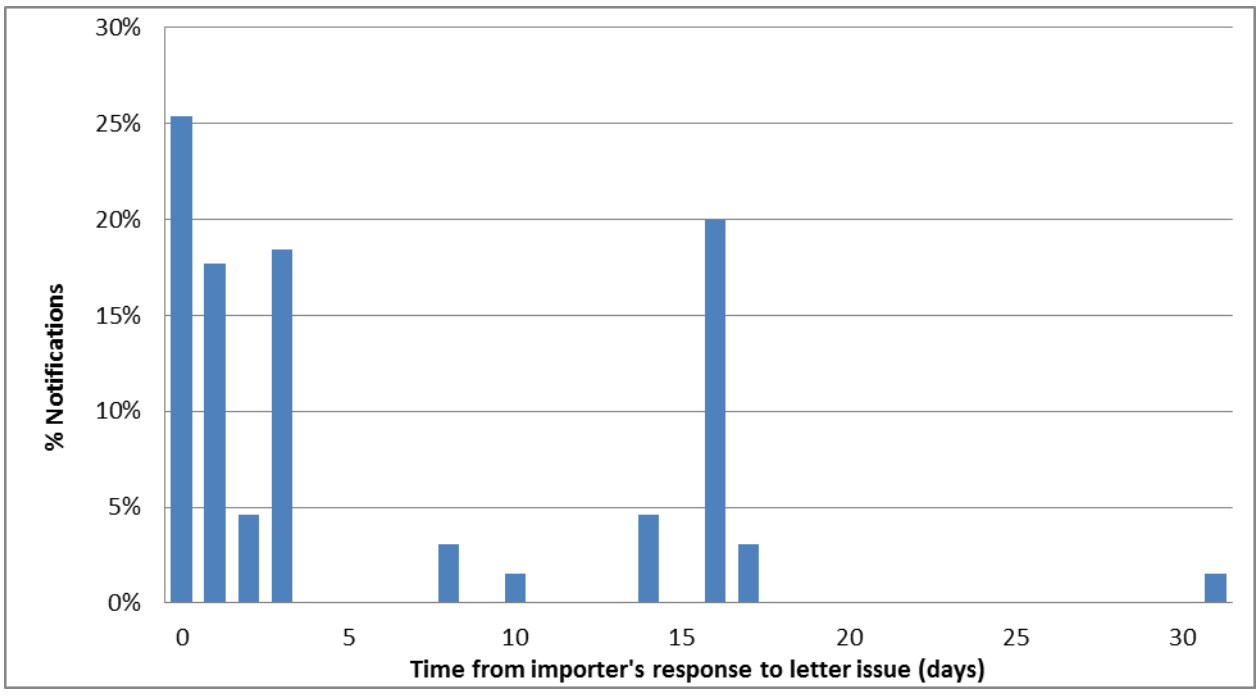
Graph 4 Time to issue Acknowledgements, 01 Jul 2016 to 30 Sep 2016



4.3 Process timings - Further information request responses

Importers responded to 130 requests for further information from the MHRA in Q3/2016 where letters permitting import were subsequently issued. Approximately 70% of these final letters were issued within 10 days of receiving the importer's response. See Graph 5.

Graph 5 Response times to further information provided, 01 Jul 2016 to 30 Sep 2016



4.4 Process timings – Objection letters

A total of 26 Objections with Reason were issued in Q3/2016. All were issued with 28 days of acknowledgements or responses to Further Information Request letters where relevant.

4.4.1 Summary of reasons for objections to import

Table 7 Reasons for objection to import

Summary	Number of notifications
Quantity notified exceeded that permitted in SI 2012/1916	13
Equivalent UK licensed product available	6
Product was Centrally Authorised and therefore not unlicensed	5
WDA(H) not valid for activity	1
Invalid special need (Notified for cosmetic not medical purposes)	1

The maximum quantity notified for import in a single notification may be 25 individual doses or a quantity that must not exceed that required for 25 courses of no more than 3 months.

Unlicensed medicines 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 a Centrally Authorised product available within the EEA.

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Unlicensed medicine may be supplied to meet the special needs of individual patients. Special needs must be medical in nature and unable to be met by an available equivalent licensed product. Cosmetic use is therefore not an admissible special need.

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. Nine inspections were supported in Q3/2016 and a number of Inspectorate and Enforcement general queries answered.

6 Conclusions

The import notification system has operated substantially within the requirements of the regulations during Quarter 3, 2016.