**SUMMARY REPORT FOR PUBLICATION**

17 March 2020 Promotion of “vitamin B12 injection” by Vibralife Wellness Ltd (trading as VL Aesthetics)

MHRA received 2 complaints about promotional material presented on social media platforms and VL Aesthetics webpage. The complainant alleged that the medicinal product was offered for free to boost the immune system during the current coronavirus pandemic, an unlicensed indication.

[Regulation 280](http://www.legislation.gov.uk/uksi/2012/1916/regulation/280/made) of the Regulations states an advertisement must: comply with the particulars listed in the Summary of Product Characteristics (SPC); encourage the rational use of the product; and not be misleading.

[Regulation 284](http://www.legislation.gov.uk/uksi/2012/1916/regulation/284/made) which prohibits the issue to the general public of an advertisement for a prescription only medicine (POM) which are likely to lead to its use.

[Regulation 293](http://www.legislation.gov.uk/uksi/2012/1916/regulation/293/made) of the Human Medicines Regulations prohibits the sale or supply of samples of medicinal products to any member of the public by a marketing authorisation holder or any third parties. Offers to potential consumers to enable them to obtain the pack for free or for an unreasonably low sum so as to be almost free is considered to fall within this prohibition.

MHRA upheld the complaint regarding the promotional offer for a prescription only medicine (POM), mentioning a specific POM in promotional material and suggesting the use of this medicine outside its licenced indication(s) as listed in the SPC. Vibralife Wellness Ltd confirmed that they had removed the promotional offer in question so as to comply with Regulation 293 going forward. The company also agreed to review their social media and related content to ensure it complies with MHRA guidance for providers that offer medicinal treatment services in [Appendix 6](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407289/Appendix_6_-_Blue_Guide.pdf) of the [MHRA Blue Guide](https://www.gov.uk/government/publications/blue-guide-advertising-and-promoting-medicines).