FOI 23/680

Dear

Thank you for confirming on 17 October 2023 that you were content for the FOIs to be split across a series of requests, with an initial response to deal with the first two questions.

We apologise for our delay in coming back to you; a response had been prepared but an administrative error occurred during handling steps. We have therefore completed the response to your request FOI 23/680. As indicated in our email to you of 16 October 2023, this is a refusal of all 8 questions originally asked as the time needed to locate, retrieve and extract all the information sought would exceed the 24 hour appropriate limit set out in section 12(1) of the FOI Act.

This is particularly because question 3 requires considerable location and retrieval. This is because for this question we would need to retrieve and review all clinical study reports from the year the Fluenz was first initiated; the summary product information for Fluenz Tetra refers back to data from studies in 2001. Each clinical study would need to be retrieved and the relevant information on vaccine efficacy extracted in order to fulfil this part of your request. Time needed to retrieve and extract information in response to the other questions you have asked would be in addition to this. The Information Commissioner's guidance advises that when section 12 applies to a number of related questions within a request, these should be refused in their entity; we therefore confirm that section 12(1) applies to your request.

When section 12 applies, we are also required to provide advice and assistance to the requester. We have therefore provided responses below to questions 1, 2, 4, 5 and 6 of your original request. We can also conform that we do not hold the information sought in question 7.

If you wish to proceed with a narrowed or refined request for a smaller amount of information sought in question 3, we advise that you narrow this request to the most recent clinical study. However, consequential tables of VE data will be included in the EMA PAR for Fluence Tetra, the link to which is provided below.

Our response

For the first two questions, our response is:

"The Fluenz Tetra Flu-vaccine (nasal spray) is currently being offered to children across the UK. Can you please provide.

1. *The estimated Vaccine Efficacy (VE) for the 2023/24 version of the vaccine ?*
2. *The Vaccine Effectiveness for the 2022/23 version of the FLU vaccine"*

In terms of the vaccine efficacy data this is summarised in Section 5.1 of the Summary of Product Characteristics, located here. An excerpt follows below, however, estimated VE for the 2023/24 version of the vaccine are not held for the purposes of FOI, and contemporary clinical trial data on vaccine effectiveness for the 2022/23 version of the vaccine is also not held.
Clinical trials are undertaken for novel vaccines, but are not typically required for changes/updates to the strains of antigens included within the flu vaccines e.g. when the formulations are adjusted to cater to the flu strains expected to be circulating or circulating in the different flu seasons. The recommendations regarding strain changes are made by the WHO, see the following link for further information: 202202_recommendation.pdf (who.int). The UK-Health Security Agency (UK-HSA) may hold data regarding VE estimates for Fluenz based on real-world studies. UK-HSA can be contacted here: https://research.ukhsa.gov.uk/contact/.
The following resources on the following pages may also be useful:
Annual flu programme - GOV.UK (www.gov.uk)
Effectiveness of flu vaccination
"The effectiveness of flu vaccination will vary from year to year, depending on the match between the strain of flu in circulation and that contained in the vaccines. Because the flu virus can change from year to year there is a risk that the vaccine does not match the circulating virus. Even if the vaccine is not a perfect match it will usually offer some protection. Major mismatches do not happen very often."
Seasonal influenza activity
"Seasonal influenza activity Public health and laboratory responses to the COVID-19 pandemic disrupted the influenza surveillance and/or reporting activities to varying extents in many countries. SARS-CoV-2 mitigation strategies including restrictions on travel, use of respiratory protection, and social-distancing measures in most countries continue to result in decreased influenza transmission. Between September 2021 and January 2022, low numbers of influenza detections were reported and fewer viruses have been available for characterization in comparison to similar time periods prior to the COVID-19 pandemic. Nevertheless, epidemics were reported by a number of countries and regions, with higher detections of influenza activity in the 2021-2022 season than in the 2020-2021 influenza season."
Fluenz Tetra, common name - influenza vaccine (live attenuated, nasal) (europa.eu) – EMA public assessment report
Fluenz Tetra, INN-influenza vaccine (live attenuated, nasal) (europa.eu) – EMA summary of changes to the Fluenz Marketing Authorisation

To assist, we are also providing responses to questions 4, 5 and 6 here:

- *A full suite of the potential side effects and adverse reactions that may occur in a recipient of the vaccine.*

Please refer to the Product Information Leaflet (PIL) and the Summary of Product Characteristics (SPC) which lists all the known possible side effects associated with the Fluenz Tetra vaccine, this information can be found here: https://products.mhra.gov.uk/search/?search=Fluenz+Tetra+vaccine&page=1 .

- *Can you confirm the number of Yellow Card reports that have been submitted for the Fluenz Tetra vaccine?*

The Medicines and Healthcare products Regulatory Agency (MHRA) continuously monitors the safety of vaccines through a variety of pharmacovigilance processes including the Yellow Card scheme. As part of our signal detection processes all adverse reaction reports received by the Yellow Card scheme are individually assessed and cumulative information reviewed at regular intervals. If appropriate, regulatory action would be taken if any serious risks were confirmed.
We can confirm that the MHRA has received 3094 UK spontaneous suspected adverse reaction reports associated with the Fluenz Tetra vaccine up to and including the 2 October 2023.

- *Can you provide a breakdown of the Yellow Card reports and reactions that have been reported - this should include a breakdown of any fatalities, series events and all other significant detail.*

Please see below for details of our response to this part of your request. We have aimed to include the information you have described however if there are any further details or information you consider significant that is not included, please let us know and we would be happy to provide this where we are able. It may be useful to review our interactive Drug Analysis Profles (iDAPs) for medicines on our website to understand the type of data we hold.

Please find attached a Vaccine Analysis Print (VAP) which lists all the UK spontaneous suspected adverse reactions reported to the MHRA in association with the Fluenz Tetra vaccine up to and including the 2 October 2023. Also attached is a guidance sheet which provides you with further information on how to interpret the print.

Please refer to table 1 below for the number of Yellow Card reports broken down by seriousness. A report is considered serious either because the reporter has flagged this as a serious case by selecting one or more of the CIOMS[1] criteria, or because one of the reaction terms itself is classed as serious in our medical dictionary.

Table 1: The number of UK spontaneous suspected adverse reaction reports considered serious, non-serious or where a fatal outcome was reported for Fluenz Tetra up to including 02/10/2023.

	Serious (excluding fatal)	Non-serious	Fatal
Number of reports	1736	1350	8

When considering the attached spontaneous data, it is important to be aware of the following points:

- A reported reaction does not necessarily mean it has been caused by the vaccine, only that the reporter had a suspicion it may have. Each year, millions of doses of routine vaccinations are given in the UK alone, and when any vaccine is administered to large numbers of people, some recipients will inevitably experience illness following vaccination. The fact that symptoms occur after use of a vaccine or medicine, and are reported via the Yellow Card scheme, does not in itself mean that they are proven

to have been caused by it. Underlying or concurrent illnesses may be responsible and such events can also be coincidental.

- The number of reports received via the Yellow Card scheme does not directly equate to the number of people who suffer adverse reactions and therefore cannot be used to determine the incidence of a reaction or compare the safety profile of different vaccines. ADR reporting rates are influenced by the seriousness of ADRs, their ease of recognition, the extent of use of a particular medicine or vaccine and may be stimulated by promotion and publicity.

We trust that you will find this information of use. If you disagree with how we have interpreted the Freedom of Information Act 2000 in answering your request, you can ask us to review our actions and decisions by writing to: info@mhra.gov.uk, and requesting an internal review.

Please note that your internal review request must be in a recordable format (email, letter, audio tape etc.), and that you have 40 working days upon receipt of this letter to ask for a review. We aim to provide a full response to your review request within 20 working days of its receipt. Please quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted online via an electronic form: https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/

Or in writing to:
Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Yours sincerely

MHRA Customer Experience Centre
Communications and engagement team
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